



3/7/2019

USDA Forest Service, Angeles National Forest  
Attn: Jose Henriquez-Santos  
701 N. Santa Anita Ave  
Arcadia, CA 91006-2725  
Submitted Via Email: [jhenriquezsantos@fs.fed.us](mailto:jhenriquezsantos@fs.fed.us)

**RE: Williamson Rock/ Pacific Crest National Scenic Trail Project  
Environmental Impact Statement and Little Rock Creek Mountain  
Yellow Legged Frog Recovery Plan**

Dear Mr. Henriquez-Santos,

Based on a shared concern over the survival of the endangered Mountain Yellow-legged Frog (*Rana muscosa*), Access Fund and the Center for Biological Diversity are writing to request that priority be placed on habitat restoration for the Mountain Yellow-legged Frog in Little Rock Creek and elsewhere on the Angeles National Forest. Currently the Angeles National Forest is working to complete the Williamson Rock/ Pacific Crest National Scenic Trail Project FINAL Environmental Impact Statement (EIS), but none of the alternatives under consideration include adequate restoration for the frog or its habitat.

According to a 2018 biological review produced by the U.S. Fish and Wildlife Service, the Mountain Yellow-legged Frog is currently extant in only 10 locations, all of which are isolated in headwater drainages and face various threats, including non-native predatory trout, environmental factors, pollution, foot traffic, and others. Likely reflecting these threats, remaining Frog populations are critically small. Despite extensive survey, the USGS abundance estimate was only 126 frogs in 2017, 84 of which were in Little Rock Creek making this population critical to the survival of the species. This importance is underscored by the fact that the Fish and Wildlife Service designated Little Rock Creek as critical habitat.

USGS estimated that abundance in Little Rock Creek steadily increased from 2005-2015 following the removal of non-native trout from a reach below Williamson Rock and closure of the area to human traffic, but declined in 2016 and 2017. It is not clear why the abundance appears to have declined in recent years despite non-native trout removal and area closure. This suggests that the time for further restoration is now.

Notably, the recovery plan for the Frog identifies extensive downstream areas of Little Rock Creek as a target for further recovery, such recovery will only occur with active removal of non-native trout and habitat restoration.

The DRAFT EIS released in July 2018 included two action alternatives to consider allowing controlled rock climbing access to portions of Williamson Rock while protecting habitat for the federally listed Mountain Yellow-legged frog and nesting raptors. Access Fund has been working for years with many local partners, representing tens of thousands of people and local businesses, to ensure that reinstated recreational access at Williamson is consistent with conservation of the Mountain yellow-legged frog. Although the Center continues to oppose opening this area, particularly the PCT and the creation of a new system trail (the Long Trail), both Access Fund and Center for Biological Diversity are concerned about a lack of habitat restoration planning in the DRAFT EIS for Little Rock Creek, which could potentially assist the species in recovery and offset potential impacts from opening the area to recreation and other use.

Access Fund and Center for Biological Diversity jointly request that the Forest Service include additional habitat restoration actions in the final EIS under all action alternatives guided by the recently completed recovery plan approved by the U.S. Fish and Wildlife Service on December 20, 2018. As a means of further offsetting any impacts of opening the area, we further ask the Forest Service to identify additional sites outside of Little Rock Creek for reintroduction of the Frog and include reintroductions and the associated habitat restoration in the action alternatives. By including habitat restoration in the same planning document along with potential recreational access, the Forest Service can assist Access Fund, the Center, and other stakeholders in determining collaboratively how best to sequence appropriate management actions. With the approval of the final recovery plan by USFWS, habitat restoration should now be incorporated into the current planning process. It is the Center's request that this restoration work is completed and shown effective before the area is opened for recreation.

In conclusion, Access Fund and the Center for Biological Diversity share concern over the long-term conservation of the Mountain Yellow-legged Frog and the importance of prioritizing habitat restoration. Access Fund and the Center for Biological Diversity recommend site specific plans be developed for expanding the Frog's habitat in Little Rock Creek and establishing additional viable populations on the Angeles National Forest, including installing additional fish barriers -- a proven method for increasing *R. muscosa* populations. The Access Fund is ready and eager to partner with the Angeles National Forest, U.S Fish and Wildlife Service and USGS to raise funds for additional habitat restoration needs including additional fish barriers.

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### **The Access Fund**

The Access Fund is a national advocacy organization whose mission keeps climbing areas open and conserves the climbing environment. A 501c(3) nonprofit and accredited land trust representing millions of climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—the Access Fund is a US climbing advocacy organization with over 20,000 members and over 123 local affiliates. Access Fund holds a national level Memorandum of Understanding with the Forest Service.<sup>1</sup> Access Fund provides climbing management expertise, stewardship, project specific funding, and educational outreach. For more information about the Access Fund, visit [www.accessfund.org](http://www.accessfund.org).

### **Center for Biological Diversity**

At the Center for Biological Diversity, we believe that the welfare of human beings is deeply linked to nature — to the existence in our world of a vast diversity of wild animals and plants. Because diversity has intrinsic value, and because its loss impoverishes society, we work to secure a future for all species, great and small, hovering on the brink of extinction. We do so through science, law and creative media, with a focus on protecting the lands, waters and climate that species need to survive.

Sincerely,



Katie Goodwin  
California Regional Director & Policy Analyst-Access Fund

/s/

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<sup>1</sup> See <https://www.accessfund.org/uploads/Access-Fund-USFS-MOU-2014.pdf>