



Inland Empire Waterkeeper

Advocacy • Education • Restoration • Enforcement

January 4, 2008

Jim Bartel, Field Supervisor
Carlsbad Fish and Wildlife Office
6010 Hidden Valley Road
Carlsbad, CA 92011
Transmitted via email: fw8cfwocomments@fws.gov

RE: Proposed Critical Habitat Designation for the San Bernardino Kangaroo Rat (*Dipodomys merriami parvus*)

Dear Mr. Bartel:

Thank you for the opportunity to comment on the proposed critical habitat designation for this imperiled species. The alluvial fans along the base of the San Gabriel and San Bernardino Mountains are one of the most depleted and threatened habitats in the state. Conservation of this ecosystem – the objective of the Endangered Species Act – depends upon proper determination of critical habitat for the San Bernardino Kangaroo Rat (SBKR). The currently proposed exclusion of previously designated areas is not scientifically valid.

The following changes are needed:

- Continuity between populations must be maintained, including along channelized but soft-bottomed watercourses like Cable Creek.
- Areas important to the natural flood and flow regimes must be reinstated, for example, along Mill and Plunge Creeks, even if the habitat is currently unoccupied.
- The proposed redefinition of critical habitat to only include persistently occupied “core” areas is scientifically indefensible. The Service has not provided an evidentiary basis for abandoning known SBKR to development. More peripheral or sporadically occupied locations are also essential for conservation of the species, given known population fluctuations, the baseline level of depletion, genetic variability, and species recovery needs.
- The proposal to limit critical habitat to “areas where SBKR have been repeatedly detected through live trapping” automatically excludes substantial areas that have not been surveyed and which, on the basis of suitable habitat or hydrological processes, may be essential for conservation.
- Some of the specific areas that require reevaluation include Plunge Creek near Highland, the Santa Ana River in Redlands, Lytle Creek near the 210 freeway, Cable Creek in the City of San Bernardino, and the Etiwanda Fan.

Inland Empire Waterkeeper is a grassroots, nonprofit water quality organization that works to enhance the water quality of all inland waterways. Preserving open space, especially on alluvial fans, is part of ensuring a healthy watershed.

Sincerely,

Lee Reeder, Keeper