



DAN A. GATTIS  
County Judge  
WILLIAMSON COUNTY, TEXAS

January 31, 2012

Dr. Benjamin N. Tuggle, Regional Director  
United States Department of the Interior  
U.S. Fish and Wildlife Service  
Post Office Box 1306  
Albuquerque, New Mexico 87103

Dear Dr. Tuggle,

This letter addresses concerns regarding the potential listing of the Georgetown and Jollyville Plateau (*Eurycea naufragia* and *E. tonkawae*, respectively) as threatened or endangered pursuant to the Endangered Species Act of 1973. We would also consider the Salado salamander (*E. chisholmensis*) to be considered in conjunction with this letter, although the focus following is on the two former species. The specific impetus for this letter is a recent petition for emergency listing of the Jollyville Plateau salamander.

Last year, the U.S. Fish and Wildlife Service ("Service") entered into settlement agreements with WildEarth Guardians and the Center for Biological Diversity requiring the Service to take action on listing and critical habitat decisions for hundreds of species pursuant to section 4 of the Endangered Species Act ("ESA"). Among the species the Service agreed to take action on are three central Texas salamanders: the Jollyville Plateau salamander, the Georgetown salamander, and the Salado salamander. The Jollyville Plateau salamander and the Georgetown salamander occur in Williamson County, Texas and a portion of the watershed affecting the Salado salamander also occurs in Williamson County. Williamson County is a rapidly growing county in the Austin metropolitan area and has provided critical job growth in the region for decades.

Williamson County, however, is no stranger to addressing endangered species issues and, in fact, in 2008, the Service approved the Williamson County Regional Habitat Conservation Plan ("Plan"), administered by the Williamson County Conservation Foundation ("Foundation"), as a landmark effort to streamline ESA permitting and provide conservation of species habitat. The Plan identified the Georgetown salamander as "an evaluation species" because although it is not a covered species under the Plan, it is a candidate for ESA listing and occurs only within Williamson County. Under the Plan, the Service and the County agreed that the County would conduct a five-year study with the purposes of further delineating the potential threats to the species, and identifying the conservation strategy for the species. Based on

those commitments, the Service significantly reduced the listing priority of the Georgetown salamander. In addition, at significant expense, the County has acquired and is maintaining very important habitat for this species.

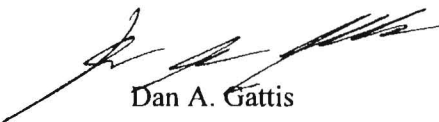
Pursuant to the Plan, the County budgeted \$250,000 for the study of this species and only a portion of that has been expended to date as the five year study is only into its seventeenth month. In addition, in reaction to the Service's agreement to take listing action on the Jollyville Plateau salamander, the Foundation recently authorized an additional \$250,000 for the study of that species. Simultaneously the Foundation approved expending \$150,000 to accelerate the research schedule on the Georgetown salamander. Both studies will provide much needed scientific information because there is currently a dearth of knowledge about the species' population size, ecological requirements, breeding habits, and threats.

The County and the Foundation strongly believe that listing of these species is not warranted at this time. The threats, if they exist, are at most poorly understood and both the Jollyville Plateau and Georgetown salamanders benefit from numerous conserved habitat locations, including locations in preserved lands. Two environmental groups, the Center for Biological Diversity and Save Our Springs Alliance, are pressing the listing of the Jollyville Plateau salamander in an effort to stop the City of Austin's construction of a new water treatment plant in northern Travis County. Listing of these species without adequate scientific knowledge about them today could result in severe economic consequences for Williamson County.

Williamson County would oppose any efforts on emergency listing. We do not believe that an emergency situation exists as there is no immediacy of possible threats to the species. At the appropriate time, the county and the Foundation will provide additional information regarding current research findings and best available science regarding the salamander species and potential listing activities under the settlement agreements.

Thank you for your consideration.

Williamson County, Texas



Dan A. Gattis  
County Judge

CC: Adam Zerrenner, Field Supervisor  
Gary Mowad, Austin ES