

**Amphibian Ark, Amphibian Survival Alliance
Center for Biological Diversity
Center for Invasive Species Prevention, Defenders of Wildlife
Natural Areas Association**

Nov. 14, 2014

Dan Ashe, Director
U.S. Fish and Wildlife Service
Department of the Interior
1849 C St NW
Washington, DC 20240

FEDERAL EXPRESS

Re: Urgent - protecting native salamanders; Meeting Request

Dear Director Ashe,

This is an urgent request on behalf of the above-listed conservation and scientific organizations for you to protect America's salamanders by taking action against a well-documented emerging wildlife disease caused by the chytrid fungus *Batrachochytrium salamandrivorans* (or *Bsal*). On Oct. 31st, *Science* published the key study explaining this threat, by Martel et al.: "Recent introduction of a chytrid fungus endangers Western Palearctic salamanders."¹ That was accompanied by the "In Depth" feature in the same issue, "The coming salamander plague". The policy context is set well in the article in the *New York Times* of Oct. 31, "Infection That Devastates Amphibians, Already in Europe, Could Spread to U.S."²

The situation can be summarized as follows: *Bsal*, a recently described emerging fungal pathogen of Asian origin, most likely carried via the pet trade, is now killing native salamanders in Holland and Belgium. All steps must be taken to keep *Bsal* out of the United States where it does not exist yet. Our native salamanders are known to be vulnerable to decimation by this new disease if it arrives. The U.S. is the global center of salamander diversity. They must be protected for their own sake and because of the significant role they play in the forest ecosystems of our country. Salamanders are key components of many food webs and important to nutrient cycling. They possess strong aesthetic and intrinsic value.

Comparable novel pathogen incursions in recent years have included West Nile virus in birds, a previous chytrid fungus (*Batrachochytrium dendrobatidis* or *Bd*) in amphibians, and white-nose syndrome in bats. America's native wildlife populations cannot withstand such multiple

¹ *Science* 346, 630 (2014); DOI:10.1126/science.1258268

² Online at: <http://www.nytimes.com/2014/10/31/science/salamanders-fungal-disease-europe-an-martel.html?hp&action=click&pgtype=Homepage&module=second-column-region®ion=top-news&WT.nav=top-news>

devastating disease outbreaks. Fortunately, with *Bsal* there is ample warning to prevent its arrival and spread. We ask you to use every possible authority to achieve this, with particular focus on the Lacey Act and the Endangered Species Act (ESA). We note that the ESA Sec. 7(a)(1) directs: “*The Secretary [of the Interior] shall review other programs administered by him and utilize such programs in furtherance of the purposes of this Act.*” Your agency administers the wildlife import inspection and compliance programs at the nation’s ports of entry. Through these programs the Secretary of the Interior exercises authority over imports of all live salamanders. In view of this major new import-related threat to the many ESA-listed Threatened and Endangered salamander species, we urge you to manage these programs to ensure that *Bsal* and other diseases are kept out of the nation. If we do not keep *Bsal* out, we are likely to see many more salamander listings under the ESA in the future.

We recommend that your agency promptly suspend all imports of any salamander or newt. Then, promptly develop a program of only allowing imports that are certified by the Service as free of *Batrachochytrium salamandrivorans* and other deadly salamander pathogens or parasites. Such certification could be based on verified clean sources, reliable testing, treatment, quarantine or other measures; the precise approach will require expert design and review. The number of animal import businesses that deal in salamanders is small; they should be supportive of measures that ensure their shipments are certified to not carry a potentially devastating disease.

One avenue to achieve a more comprehensive amphibian disease prevention approach could be by the Service responding positively to the Defenders of Wildlife 2009 Petition: “To List All Live Amphibians in Trade as Injurious Unless Free of *Batrachochytrium dendrobatidis*,” which several of our organizations endorsed long ago. The Service has already taken public comment on the Petition, but the Service’s response would need to be broader than the scope of that Petition. The Service could reasonably decide the best response is to create a certification program aimed at all potentially deadly amphibian pathogens, using the template of the 2009 Petition.

Voluntary measures by live animal importers and information/education campaigns are all also vital. We will be happy to assist with these efforts in any way that we can.

Thank you for your prompt attention to this need. Our organizations, coordinating with others, will seek a personal meeting with you to discuss this request. For further information, please contact: Peter T. Jenkins, tel: 301.500.4383; email: jenkinsbiopolicy@gmail.com.

Sincerely,



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