



June 10, 2014

Sent via Email and U.S. Mail

Sally Jewell, Secretary
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240
Secretary_jewell@ios.doi.gov

Dan Ashe, Director
U.S. Fish and Wildlife Service
1849 C Street, NW
Washington, DC 20240
Dan_Ashe@fws.gov

Gary Frazer
Assistant Director for Endangered Species
U.S. Fish and Wildlife Service
1849 C Street NW
Washington, D.C. 20240
gary_frazer@fws.gov

Gina Shultz, Chief
Division of Conservation and Classification
Endangered Species Program
U.S. Fish and Wildlife Service
4401 N. Fairfax Drive, Room 420
Arlington, VA 22203
Gina_Shultz@fws.gov

Ren Lohofener, Regional Director
U.S. Fish and Wildlife Service
Region 8 – Pacific Southwest
2800 Cottage Way Room W-2606
Sacramento, CA 95825
ren_lohofener@fws.gov

Re: New Study Splits Western Pond Turtles into Two Species

On behalf of the Center for Biological Diversity, we are writing to inform the U.S. Fish and Wildlife of a study published last month that splits the western pond turtle into two species:

Spinks, P.Q, R.C. Thomson, and H.B. Shaffer. 2014. The advantages of going large: genome-wide SNPs clarify the complex population history and systematics of the threatened western pond turtle. *Molecular Ecology* 23: 2228–2241.

Using multiple analytical methods and data sets, the researchers revised the taxonomy of the western pond turtle to identify two new species. All populations north of the San Francisco Bay area and populations from the Central Valley north (including the apparently introduced Nevada population) are now known as *Emys marmorata*. Turtles in the southern portions of their range — the central coast range south of the San Francisco Bay and including the Mojave River — are known as *Emys pallida*. Turtles from Baja California are tentatively considered *Emys pallida* but these animals may represent another distinct species pending results from additional analysis.

These newly identified species are even more endangered than the previously recognized singular entity. As such, this new study reaffirms the need to provide Endangered Species Act protection for western pond turtles.

On July 11, 2012, the Center for Biological Diversity submitted a petition to list the western pond turtle and 52 other amphibian and reptiles species. The petition asks the FWS to protect six turtles, seven snakes, two toads, four frogs, 10 lizards and 24 salamanders under the ESA. A copy of the petition, along with a list of the petitioned species, is available here: http://www.biologicaldiversity.org/campaigns/amphibian_conservation/pdfs/Mega_herp_petition_7-9-2012.pdf. Backed by hundreds of scientific articles, the 450-page petition details the status of, and threats to, the petitioned animals, demonstrating the urgent need for their federal protection.

Western pond turtles and the other petitioned species are at risk and deserve a prompt status review by the U.S. Fish and Wildlife Service. Please add this new study – which is attached to this letter – to your file of best available science on western pond turtles. Feel free to contact us with any questions or concerns.

Sincerely,



Collette L. Adkins Giese
Amphibian and Reptile Staff Attorney
Center for Biological Diversity

D. Noah Greenwald
Endangered Species Program Director
Center for Biological Diversity