

Dear Members of the Midwest PARC Community

MWPARC's mission is to foster data-driven conservation of native amphibians, reptiles, and their habitats through inclusive outreach, research, networking, and collaboration at the regional level. We want to highlight that protecting **habitat** is an essential component of protecting species.

The Department of the Interior is proposing to change a rule under the Endangered Species Act (ESA)¹. This rule change would narrow the definition of causing 'harm' to species by removing actions that destroy or degrade critical habitat from the definition of 'harm'. In essence, only actions that directly harm an individual of an endangered or threatened species would be prohibited under ESA but indirect actions that alter habitat (e.g, resource extraction) would not be considered 'harmful'. This is akin to saying that burning someone's house down will not harm them if they are not in it at the time. This rule change is counter to established management practices that promote species conservation and recovery across the nation.

Habitat loss and degradation is the primary cause of biodiversity loss across many groups, including amphibians and reptiles^{2,3}. In the midwest region of the US, 12 amphibian and 16 reptile species are considered Regional Species of Greatest Conservation Need, with many more facing an uncertain future⁵. Some of these are Federally listed or are proposed for listing under the ESA and could be harmed by the proposed rule change⁶. Listed species and populations include the Ozark Hellbender (*Cryptobranchus alleganiensis bishop*i), Missouri population of Eastern Hellbender (*C. alleganiensis alleganiensis*), Eastern Massasauga (*Sistrurus catenatus*), and northern populations of the Copperbelly Water Snake (*Nerodia erythrogaster neglecta*). A number of species are under consideration, including the Alligator Snapping Turtle (*Macrochelys temminckii*), Blanding's Turtle (*Emydoidea blandingii*), Wood Turtle (*Glyptemys insculpta*), Spotted Turtle (*Clemmys guttata*) and Eastern Hellbenders across their entire range. Our native wildlife will not survive without strong protections for the habitats that are essential for shelter, food, and reproduction.

Actions you can take include:

- Visit our <u>Regional Resources</u> and <u>PARC Products</u> pages to learn more about the amphibians and reptiles that live near you⁷.
- Share your amphibian and reptile stories and the importance of safeguarding their habitats with your community, friends and family, and leaders.
- Consider making a public comment on the <u>federal register</u> about the proposed rule change¹ by **May 19th**.
- Consider submitting op-ed articles to your local newspaper
- Use best<u>management practices</u>⁸ when managing lands to better protect threatened species and help keep common species abundant.

Thank you for helping to safeguard amphibians and reptiles,

Midwest PARC Advisory Board Ohio PARC Advisory Board Wisconsin PARC Advisory Board

- 1. https://www.federalregister.gov/documents/2025/04/17/2025-06746/rescinding-thedefinition-of-harm-under-the-endangered-species-act
- 2. https://www.nature.com/articles/s41586-022-04664-7
- 3. https://www.iucn-amphibians.org/state-of-the-worlds-amphibians/
- 4. https://www.fws.gov/media/wetland-losses-united-states-1780s-1980s
- 5. https://www.mlimidwest.org/midwest-regional-species-of-greatest-conservation-need/
- 6. https://ecos.fws.gov/ecp/
- 7. https://www.mwparc.org/region
- 8. https://www.mwparc.org/_files/ugd/fdd25d_6ba289f1cf7b4873a320b2a2a82a2b1b.pdf