March 14, 2016

Public Comments Processing
Attn: FWS-HQ-FAC-2015-0005
Division of Policy Performance and Management Programs
US Fish and Wildlife Service; MS:BPHC
5275 Leesburg Pike
Falls Church, VA 22041-3803

I am writing on behalf of the Association of Zoos and Aquariums (AZA) and the American Association of Zoo Veterinarians (AAZV) in response to a recent interim rule whereby USFWS is amending its regulations under the Lacey Act to add all species of salamanders from 20 genera to the injurious wildlife list. This proposed listing is in response to the threat of the salamander fungus, *Batrachochytrium salamandrivorans* (*Bsal*), entering the United States. AZA and AAZV strongly believe that all common-sense steps should be undertaken quickly to minimize the risk of *Bsal* introduction and spread but we have several concerns associated with this interim rule.

AAZV is an organization representing over 1,100 veterinarians involved in all aspects of the veterinary care, health, welfare and research for captive and free-ranging wildlife. The organization represents animal health professionals from multiple disciplines with wide expertise in zoo and wildlife species, including amphibians. AAZV is a leading organization representing veterinarians providing salamander care in the United States. It is from this perspective as knowledgeable and caring veterinarians seeking the best salamander care and management that AAZV joins AZA in this letter.

AZA is a non-profit organization dedicated to the advancement of accredited zoos and aquariums in the areas of animal care and husbandry, conservation, education, science and recreation. With outreach programs that touch over 182 million visitors annually in 230 accredited zoos and aquariums and a leading role in wildlife science, zoos and aquariums accredited by the AZA are increasingly important contributors to the conservation of wildlife and natural habitat. Collectively, AZA institutions have over 750,000 animals under professional care with 1000 of our over 6000 species as represented in our collection being listed as threatened or endangered under the Endangered Species Act. The expertise of AZA-accredited zoos and aquariums in scientific research; conservation breeding; and endangered species rescue and rehabilitation is supported by their premier role in environmental education. AZA and its members are vital to the conservation of the world’s threatened and endangered species, with over 3500 conservation projects and 115 species reintroduction programs. In addition, AZA and its member institutions work in concert with Congress, the Federal agencies, conservation organizations, the private sector and the general public to conserve our wildlife heritage.
AZA accredited zoos and aquariums have a long history of contributing to wildlife conservation, research, and education and these contributions are growing. The AZA community is investing significant time and financial resources to assure that our captive animal populations are genetically and demographically sustainable to support these important activities long-term. In this regard, AZA has established the Species Survival Plan (SSP) program—a long-term plan involving genetically diverse breeding, habitat preservation, public education, field conservation and supportive research to assure survival for many threatened and endangered species from around the world.

AZA and its member institutions take the issue of invasive species and disease introductions very seriously. In 2003, the AZA Board of Directors adopted the following policy which:

- encourages AZA members to make every effort to ensure that their animal and plant collections and management practices do not become the source of non-native species introductions

- urges zoo and aquarium horticulturalists to be cognizant of invasive species concerns when working with non-native ornamental or browse plants

- encourages AZA members to partner with federal, state, and local agencies to establish policies that regulate the acquisition, ownership, and disposition of non-native, potentially invasive organisms

- encourages AZA members who travel overseas to follow all relevant government regulations regarding the transportation of biological materials

- encourages AZA members to educate the public and key decisionmakers about the deleterious impacts associated with species introductions, and

- reminds AZA members to consult the IUCN Guidelines for the Prevention of Biodiversity Loss Caused by Alien Invasive Species.

AZA accredited zoos and aquariums are also using education as a mechanism to combat the spread of invasive species and diseases. A primary theme of zoo and aquarium exhibits is public awareness of Bsal and other disease epidemics, and the role that citizens play in preventing species invasions. U.S. citizens will need to change their attitudes and behaviors to prevent the spread of these types of diseases into the environment (e.g. not releasing bait from one area to another; disinfecting field gear from one site to the next; not releasing any pets of any kind into the environment including domesticated cats and dogs, etc.).

**AZA Concerns with the Interim Rule**

While we appreciate the Lacey Act and its implementing regulations, we question whether it is the best vehicle to accomplish this enormous objective. Experience has shown us that the Lacey Act, its implementing regulations and resultant permits have not always proven to be the most effective mechanism in controlling the introduction or spread of invasive species or diseases.

In this case, AZA supports the use of the Lacey Act as a temporary emergency measure, however we urge USFWS and stakeholders to continue to look for alternative long-term strategies to manage this threat effectively and efficiently through testing and monitoring of future salamander movements. Although we understand the rationale for listing salamanders,
we foresee unintended consequences that threaten to curtail legitimate conservation, education, and research efforts.

Sustainable population management in the zoo and aquarium community requires regularly moving animals between institutions for breeding and rearing purposes. The logistical impediments to such moves (transport, weather, quarantine/veterinary pre-ship testing, and coordination of animal spaces) are already very challenging. Requiring a USFWS permit for each interstate movement makes the work significantly more difficult and slows the process, sometimes dramatically, especially as the USFWS lacks sufficient number of staff to process permits. If captive populations are to be sustainable, AZA institutions need to maximize institutional participation and enlarge the resource base.

In addition, many zoos and aquariums partner with Federal and State agencies on ex situ conservation projects. Interstate movement restrictions could have a significant impact on current and future collaborative efforts, discouraging institutions from participating in managed programs and engaging in in situ research for listed species.

Effective research (including diagnostic testing and screening for Bsal), which is desperately needed for most salamander species, often requires moving specimens and biological samples between locations and among colleagues. Requiring a permit for each such move (and on each progeny’s progeny) places an impractical burden on investigators operating with tight budgets and time constraints.

We suggest USFWS consider the following measures to moderate the impact on legitimate conservation, education and research efforts:

Exempt AZA institutions, academics, and others participating in conservation, education, and research efforts from the permit requirements. This exemption could be contingent upon adhering to containment requirements and other precautions, and could be revocable and/or;

Issue blanket permits to AZA institutions, academics, and others participating in conservation, education, and research efforts to maintain specimens, populations, and biological samples of listed species without specifically permitting individual specimens or moves. Such blanket permits would allow institutions to move animals across state lines for population management without requiring USFWS permission for each transaction; likewise for academic movement of specimens and biological samples.

As USFWS continues to formulate future policies to address wildlife resource management issues such as invasive species, I encourage the agency to call upon the informational resources and expertise of the AZA and its member institutions as an essential source of public review and comment. The professional zoo and aquarium community continues to be a strong partner with USFWS on numerous conservation programs and in reaching millions of Americans every year about the importance of protecting wildlife and wildlife habitat for future generations.

Sincerely,

Kristin L. Vehrs
Interim President & CEO