



Ecological Society of America  
1990 M Street, NW  
Suite 700  
Washington, DC 20036

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November 20, 2014

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

Re: Request to protect native salamanders from *Batrachochytrium salamandrivorans*

Dear Director Ashe,

As the world's largest organization of professional ecological scientists, the 10,000 member Ecological Society of America (ESA) urges you to protect America's salamanders by taking action against a well-documented emerging wildlife disease caused by the chytrid fungus *Batrachochytrium salamandrivorans* (or *Bs*). 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."<sup>1</sup> 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."<sup>2</sup>

The situation can be summarized as follows: *Bs*, 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 *Bs* 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 inherent 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 devastating disease outbreaks. Fortunately, with *Bs* 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

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

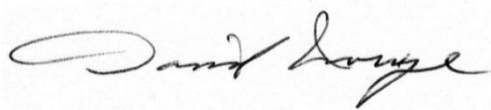
<sup>22</sup>Online at: <http://www.nytimes.com/2014/10/31/science/salamanders-fungal-disease-europe-an-martel.html?hp&action=click&pgtype=Homepage&module=second-column-region&region=top-news&WT.nav=top-news>

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 *Bs* and other diseases are kept out of the nation. If we do not keep *Bs* 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.

Thank you for your efforts to protect America's salamanders by taking action against the emerging wildlife disease caused by the chytrid fungus *Batrachochytrium salamandrivorans*.

Sincerely,

A handwritten signature in black ink, appearing to read "David Inouye", written in a cursive style.

Dr. David W. Inouye  
President

CC: David Hoskins, Bryan Arroyo, Craig Martin, Susan Jewell, USFWS