



**FRESHWATER MOLLUSK CONSERVATION SOCIETY
1417 HOFF INDUSTRIAL DR.
O'FALLON, MO 63366**

December 14, 2012

James F. Boggs, Field Supervisor
U.S. Fish and Wildlife Service
Arkansas Ecological Services Office
110 South Amity Road, Suite 300
Conway, AR 72032

RE: Comments on Proposed Endangered Status for Neosho Mucket, Threatened Status for Rabbitsfoot, and Designation of Critical Habitat for both species, Docket # FWS-R4-ES-2012-0031

Dear Mr. Boggs,

The Freshwater Mollusk Conservation Society (FMCS) is dedicated to the conservation of, and advocacy for, freshwater mollusks, North America's most imperiled animals. FMCS is an international professional scientific society made up of state, federal, academic, and private scientists and conservationists, many of whom work directly with the nearly 150 endangered and threatened mollusks. Our members are considered experts in the conservation and recovery of freshwater mollusks.

The U.S. Fish & Wildlife Service (FWS) has proposed to designate Neosho mucket (*Lampsilis rafinesqueana*) as Endangered and rabbitsfoot (*Quadrula cylindrica cylindrica*) as Threatened, and to designate Critical Habitat (CH) for both species in the states of Alabama, Arkansas, Illinois, Indiana, Kansas, Kentucky, Mississippi, Missouri, Ohio, Oklahoma, Pennsylvania, and Tennessee. The proposed CH designation for Neosho mucket includes 779 river kilometers in the Cottonwood, Elk, Fall, Illinois, Neosho, Shoal, Spring, North Fork Spring, and Verdigris Rivers. The proposed CH designation for rabbitsfoot includes and 2,662 river kilometers in the Neosho, Spring (Arkansas River system), Verdigris, Black, Buffalo, Little, Ouachita, Saline, Middle Fork Little Red, Spring (White River system), South Fork Spring, Strawberry, White, St. Francis, Big Sunflower, Big Black, Paint Rock, Duck, Tennessee, Red, Ohio, Allegheny, Green, Tippecanoe, Walhonding, Middle Branch North Fork Vermilion, and North Fork Vermilion Rivers and Bear, French, Muddy, Little Darby and Fish Creeks. The Federal Register notice notes that both of these mussel species are highly restricted in their ranges and the threats to them occur throughout their ranges. Both species are threatened by destruction, modification, or curtailment of habitat or range, inadequate existing regulatory mechanisms, and other manmade factors.

The FMCS supports the listing of Neosho mucket as endangered and rabbitsfoot as threatened under the Endangered Species Act, and the proposal to designate CH for both of these mussel species. Formal designation of CH facilitates priority recovery activities such as habitat restoration and reintroduction efforts. Because costs associated with formal designation are often low, this strategy is also cost effective. Additionally, several large river segments in the CH designation are already

designated CH for other species. When considering the impact of listing and recovery, it would be prudent to also include the societal and economic benefits that a functioning mussel community provides to our rivers and streams. As current research demonstrates, the economic value mussels provide to riverine ecosystems through processes such as biofiltration and nutrient retention and recycling is substantial. We urge the FWS to consider these more positive aspects of formal CH designation in their next assessment. Our membership is always eager to assist the FWS with recovery options for freshwater mollusks.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Gregory Cope".

Dr. W. Gregory Cope, Past President
Freshwater Mollusk Conservation Society