



**FRESHWATER MOLLUSK CONSERVATION SOCIETY
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March 9, 2011

Richard Nelson, Field Supervisor
U.S. Fish and Wildlife Service
Rock Island, Illinois Ecological Services Field Office
1511 47th Avenue, Moline, IL 61265

Mr. Nelson,

I write to you today on behalf of the Freshwater Mollusk Conservation Society (FMCS) to express support for the U.S. Fish and Wildlife Service (Service) proposal to list two freshwater mussel species, the spectaclecase mussel (*Cumberlandia monodonta*) and sheepsnose (*Plethobasus cyphus*), as Endangered under the Endangered Species Act of 1973, as amended (Act) (Federal Register 76(12):3392 – 3420, January 19, 2011). We also concur with the Service decision that critical habitat is not determinable at this time.

The FMCS is a non-profit professional scientific society whose mission includes education, research, outreach, and protection of freshwater mollusks, North America's most imperiled group of animals. Our membership includes individuals affiliated with state and federal government, academia, as well as amateur collectors, and citizen scientists.

As you know, freshwater mussels are considered one of the most imperiled faunas in North America, with approximately 213 of the 297 recognized taxa considered endangered, threatened or of special concern (Lydeard *et al.* 2004, Ricciardi and Rasmussen 1999, Williams *et al.* 1993). Spectaclecase and sheepsnose are rare and are represented by disjunct populations, further increasing the threats against them. Precipitous population declines have been observed for both of these species over the last several decades (Butler 2002, 2003), unfortunately warranting their classification as Endangered under the Act.

We provide our support for the protection and listing of these mussel species in the ongoing effort to conserve and protect the remaining freshwater mussel populations of the waters of the United States. Thank you for all considerations in this matter.

Sincerely,

A handwritten signature in cursive script that reads "W. Gregory Cope".

W. Gregory Cope, PhD
President, Freshwater Mollusk Conservation Society

Literature Cited:

- Butler, R.S. 2002. Status Assessment Report for the spectaclecase, *Cumberlandia monodonta*, occurring in the Mississippi River system (U.S. Fish and Wildlife Service Regions 3, 4, 5, and 6). U.S. Fish and Wildlife Service, Asheville, NC. Prepared for the Ohio River Valley Ecosystem Team, Mollusk Subgroup.
- Butler, R.S. 2003. Status assessment for the sheepnose, *Plethobasus cyphus*, occurring in the Mississippi River system. U.S. Fish and Wildlife Service, Asheville, NC. Prepared for the Ohio River Valley Ecosystem Team, Mollusk Subgroup.
- Lydeard, C., R. H. Cowie, W. F. Ponder, A. E. Bogan, P. Bouchet, S. A. Clark, K. S. Cummings, T. J. Frest, O. Gargominy, D. G. Herbert, R. Hershler, K. E. Perez, B. Roth, M. Seddon, E. E. Strong, and F. G. Thompson. 2004. The Global Decline of Nonmarine Mollusks. *BioScience* 54(4): 321-330.
- Ricciardi, A., and J.B. Rasmussen. 1999. Extinction rates of North American freshwater fauna. *Conservation Biology* 13: 1220-1222.
- Williams, J. D., M. L. Warren, K. S. Cummings, J. L. Harris, and R. J. Neves. 1993. Conservation status of freshwater mussels of the United States and Canada. *Fisheries* 18: 6-22.