



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

April 26, 2012

Don Imm, Field Supervisor  
U.S. Fish and Wildlife Service  
Panama City Ecological Services Field Office  
1601 Balboa Avenue  
Panama City, FL 32405

RE: Comments on Critical Habitat Designation for 8 Freshwater Mussel Species, Docket # FWS-R4-ES-2011-0050

Dear Mr. Imm,

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 Critical Habitat (CH) for 8 freshwater mussel species in southern Alabama and northwestern Florida under the Endangered Species Act. These 8 species include the Alabama pearlshell (*Margaritifera marrianae*), round ebonyshell (*Fusconaia rotulata*), southern sandshell (*Hamiota australis*), southern kidneyshell (*Ptychobranthus jonesi*), and Choctaw bean (*Villosa choctawensis*) proposed as endangered, and the tapered pigtoe (*Fusconaia burkei*), narrow pigtoe (*Fusconaia escambia*), and fuzzy pigtoe (*Pleurobema strodeanum*) proposed as threatened, are found in portions of the Escambia River, Yellow River, and Choctawhatchee River basins of Alabama and Florida. The Alabama pearlshell is also known from a localized population in the Mobile River basin in Alabama. The proposed CH includes 9 units and encompasses 1,495 miles of stream channel in Bay, Escambia, Holmes, Jackson, Okaloosa, Santa Rosa, Walton, and Washington Counties, Florida; and Barbour, Bullock, Butler, Coffee, Conecuh, Covington, Crenshaw, Dale, Escambia, Geneva, Henry, Houston, Monroe, and Pike Counties, Alabama. The Federal Register notice notes that these mussel species have disappeared from other portions of their natural ranges primarily due to habitat deterioration and poor water quality as a result of excessive sedimentation and environmental contaminants.

The FMCS supports CH designation for these 8 mussel species. Formal designation of CH facilitates priority recovery activities such as habitat restoration and reintroduction efforts. In some cases, the FWS can designate non-occupied CH in support of future recovery actions, mainly reintroduction efforts. Since formal recovery criteria generally require additional recruiting populations before

delisting/downlisting can occur, improving future recovery options by designation of unoccupied CH is warranted. This strategy would assist individual states resistant to reintroduction activities, by designating unoccupied watersheds for reintroduction opportunities. This recovery strategy not only applies to freshwater mollusks, but all riverine species.

Because costs associated with formal designation are low, this strategy is also cost effective. In the current proposal, the draft economic analysis conducted by the FWS estimated that incremental costs associated with the CH designation would total only \$1.41 million over 20 years. Additionally, several large river segments in the mussel designation (Escambia, Conecuh, Yellow) are already designated CH for Gulf sturgeon. Therefore expansion of mussel CH into areas previously designated for Gulf Sturgeon provides additional mussel recovery options, particularly in Florida. With other mollusk candidate and final listing rules in the pipeline, we suggest the FWS take the opportunity to improve recovery options not only for this current Gulf Coastal rule, but expand this strategy to other basins as well. As current research demonstrates, the economic value mussels provide to riverine ecosystems through denitrification is substantial. Additionally, the diminished costs of improving riverine habitat, and thus lowering water treatment and regulatory costs are rarely considered. We urge the FWS to consider the 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 blue ink that reads "Caryn C. Vaughn". The signature is written in a cursive, flowing style.

Caryn C. Vaughn, President  
Freshwater Mollusk Conservation Society