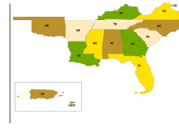




THE
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SOUTHEASTERN SECTION

Trina Morris
Georgia Department of Natural Resources
Wildlife Resources Conservation Center
2065 U.S. Hwy. 278 SE
Social Circle, GA 30025

RE: Protected Species List

Dear Ms. Morris,

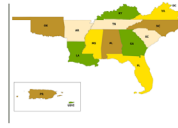
The Southeastern Section of The Wildlife Society (SETWS) strongly supports the addition of the **eastern diamondback rattlesnake** (*Crotalus adamanteus*) to the Georgia Protected Species List. SETWS is a regional collective of professionals, educators, and students dedicated to the art and science of wildlife stewardship. We promote the scientific management of wildlife resources and their habitats across the Southeast. SETWS comprises the US states of Alabama, Arkansas, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, Oklahoma, South Carolina, Tennessee and Virginia as well as the District of Columbia, Puerto Rico, and the US Virgin Islands.

The eastern diamondback rattlesnake (hereafter EDB) has long been recognized by state and federal governments to be an at-risk species due to habitat loss and fragmentation, but also because of rampant human persecution. The state of Georgia has officially recognized EDBs as a priority species of greatest conservation need since the original State Wildlife Action Plan was published in 2005 and has been included on each subsequent revision (2015, 2025). The species has been under formal federal review by the United States Fish and Wildlife Service (USFWS) since 2012, when a petition was submitted to list the species as federally threatened. The initial 90-day finding to the petition was “substantial,” which is typically a precursor to initiate a formal 12-month review of the species (Docket No. FWS-R4-ES-2012-0006). However, while the USFWS has not formally completed this review after many years and has foregone a decision to list this species, the species is being managed as a de facto candidate species as per the Candidate Conservation Agreement with Assurances the USFWS awarded the Georgia Department of Natural Resources (and other partners) in 2023 for habitat work being conducted in southern Georgia (Docket No. FWS-R4-ES-2023-0037).

Therefore, we agree with the past and current findings of the USFWS and the Georgia Department of Natural Resources that the EDB rattlesnake is a priority species of conservation concern. We agree that this species requires protection at the state level to prevent further declines. While progress has been made with habitat procurement and improvements within the EDB’s range in Georgia, and with the discontinuation of rattlesnake roundups in many parts of the state, the risks of habitat loss and extensive human persecution remain for this species.



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Georgia's goal should be to preemptively conserve this species to preclude a federal listing under the Endangered Species Act, which would likely be more restrictive than state regulations.

Thank you for your consideration.

Sincerely,

Rachael Urbanek

Rachael Urbanek, Certified Wildlife Biologist®
President, Southeastern Section of The Wildlife Society
Urbanek.rachael@gmail.com