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# SWCHR Position Paper on Texas Parks and Wildlife Department's Proposal to Amend the State Threatened Reptile and Amphibian Species Lists

In August 2019 the Texas Parks and Wildlife Department (TPWD) proposed an amendment to the state's Threatened and Endangered (T&E) Species Lists encompassing a large number of animal species—both previously-unlisted species proposed to be added to the lists, and currently-listed species proposed to be removed from the lists. In this paper the SWCHR Board of Directors addresses the proposed removal of the following reptile and amphibian species from the State Threatened Species List, using nomenclature and taxonomy as reflected in the TPWD proposal:

Reticulated Gecko (*Coleonyx reticulatus*)

Reticulate Collared Lizard (*Crotaphytus reticulatus*)

Texas Indigo Snake (*Drymarchon melanurus*)

Smooth Green Snake (*Liochlorophis vernalis*)

Chihuahuan Desert Lyre Snake (*Trimorphodon vilkinsonii*)

Timber (Canebrake) Rattlesnake (*Crotalus horridus*)

When TPWD initially established its State T&E Species Lists in the 1970s, there was little or no empirical basis for listing many of the species; rather, the lists were based largely on the opinions of people who may or may not have had direct experience with the species in question. Further, it was unclear what protections would be afforded species on the lists. Instead of merely creating bag limits or prohibiting commercial activity with the species, they were placed in an entirely "hands off" status. However, protections for critical habitat are not addressed through the T&E regulatory process, meaning even if the animals themselves cannot be captured or disturbed, their living space can be altered, destroyed, or eliminated, resulting in displacement or death of local populations of the species in question.

The unintended effect of the T&E Lists insofar as reptiles and amphibians are concerned has been to penalize the very people who appreciate and fight for them the most—the citizen-scientists—while neglecting the consequences of continued and sustained habitat degradation and loss.

The current and former State Herpetologists with TPWD have been carefully studying the status of reptiles and amphibians on the state T&E Lists. It is the understanding of the SWCHR Board of Directors that the proposal for delisting the named species is the result of scrutiny of a wealth of data accumulated over the past few decades, largely thanks to the contributions of amateur naturalists who spend countless hours in the field observing these animals.

Concerning the individual species proposals for delisting:

**Reticulated Gecko (*Coleonyx reticulatus*):** The SWCHR Board of Directors agrees with delisting this species. Reticulated Geckos are already adequately protected by virtue of their habitat across most of their known range falling within the boundaries of Big Bend National Park, Big Bend Ranch State Park, and privately-held lands with little to no public access. In publicly-accessible areas, it is likely mortality due to roadkill rivals any potential collection activity.

**Reticulate Collared Lizard (*Crotaphytus reticulatus*):** The SWCHR Board of Directors agrees with delisting this species. Reticulate Collared Lizards are already adequately protected by virtue of their habitat across most of their known range falling within the boundaries of privately-held lands with little to no public access. In publicly-accessible areas, it is likely mortality due to oilfield-traffic roadkill rivals any potential collection activity.

**Texas Indigo Snake (*Drymarchon melanurus*):** The SWCHR Board of Directors agrees with delisting this species. Texas Indigo Snakes have an extensive documented range and are already adequately protected by virtue of large segments of this range falling within the boundaries of privately-held lands with little to no public access. In publicly-accessible areas, it is likely mortality due to oilfield-traffic roadkill rivals any potential collection activity.

**Smooth Green Snake (*Liochlorophis vernalis*):** The SWCHR Board of Directors agrees with delisting this species. Smooth Green Snakes are likely extirpated within the state. The last known records are several decades old, and some are of questionable identity. Delisting this species would allow a citizen-scientist to handle and collect one for species confirmation—a win for TPWD and our knowledge of this species' natural history in Texas.

**Chihuahuan Desert Lyre Snake (*Trimorphodon wilkinsonii*):** The SWCHR Board of Directors agrees with delisting this species. Lyre Snakes are already adequately protected by virtue of their habitat across most of their known range falling within the boundaries of Big Bend National Park, Big Bend Ranch State Park, Fort Bliss Military Reservation, Franklin Mountains State Park, and privately-held lands with little to no public access. In publicly-accessible areas, it is likely mortality due to roadkill rivals any potential collection activity.

**Timber (Canebrake) Rattlesnake (*Crotalus horridus*):** The SWCHR Board of Directors agrees with delisting this species. The population of Timber Rattlesnakes in Texas appears to be stable and widespread in range, with most threats to this species consisting of habitat degradation and loss, which are not addressed by TPWD regulations.

In addition to the species proposed for delisting by TPWD, the SWCHR Board of Directors recommends delisting of the following two species:

**Sheep Frog (*Hypopachus variolosus*):** This species is abundant in its extensive range in south Texas, with no commercial interest.

**Black-striped Snake (*Coniophanes imperialis*):** This species is abundant in its range in south Texas, with little to no commercial interest. It also survives well in urban habitats.

The current TPWD proposal also recommends adding the following species to the State Threatened Species List. At this time SWCHR declines to comment on this aspect of the proposal, as it is unclear what true protections may be afforded these species other than prohibition of citizen science data collection:

Dunes Sagebrush Lizard (*Sceloporus arenicolus*)  
Concho Water Snake (*Nerodia paucimaculata*)  
Salado Springs Salamander (*Eurycea chisholmensis*)  
Georgetown Salamander (*Eurycea naufragia*)  
Texas Salamander (*Eurycea neotenes*)  
Jollyville Plateau Salamander (*Eurycea tonkawae*)

It is the understanding of the SWCHR Board of Directors that the species proposed for removal from the State Threatened Species List will remain on the “Black List” prohibiting commercial activity including purchase, sale, offering for sale, importing, or exporting those species; thus the species proposed for delisting will still enjoy a significant degree of protection.

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