



Public Comments Processing  
Docket No. FWS-R3-ES-2024-0152  
U.S. Fish and Wildlife Service  
MS: PRB/3W  
5275 Leesburg Pike  
Falls Church, VA 22041-3803  
SUBMITTED VIA ELECTRONIC UPLOAD TO DOCKET ONLY

February 5, 2025

**RE: Proposal to List the Eastern Hellbender as Endangered**

The Ohio Environmental Council (OEC) supports U.S. Fish & Wildlife Service's proposal to list the Eastern Hellbender as an endangered species under the Endangered Species Act.

The Eastern Hellbender is an Ohio-listed endangered species and an icon of wild America. As the largest amphibian on the continent it is perhaps the greatest surviving symbol of Appalachia's globally significant biodiversity. For tens of millions of years, Hellbenders have lived on this planet. Yet they are now in very real and increasing danger of extinction.

In the state of Ohio, Hellbenders have disappeared from more than 80 percent of their range since the 1980s, and many remaining populations are functionally extirpated due to low abundance, isolation, and limited to no recruitment (Smeenck et al. 2021, p. 209, Kaunert et al. 2023, p. 102). Because of low egg and larval survival, Smeenck et al. (2021) conclude, "The continued persistence of the Hellbender in Ohio is fraught with uncertainty." (p. 214).

Hellbenders face ever-increasing threats, including the recent elimination of Clean Water Act protections for many headwater streams, and the elimination of ephemeral streams from Ohio's definition of "waters of the state." See Ohio Revised Code § 6111.01(H) (amended in 2022). Notably, in Ohio, fracking infrastructure development is increasing dramatically in the Hellbender's extant range (Smeenck et al. 2021, p. 203).

Thank you for proposing to list the Eastern Hellbender as endangered. Listing this species is a necessary step toward ensuring their continued survival. We appreciate and support your efforts to protect this iconic American animal.

Sincerely,

A handwritten signature in blue ink, appearing to read "Nathan Johnson".

Nathan Johnson  
Senior Attorney, Land & Water  
Ohio Environmental Council  
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A handwritten signature in blue ink, appearing to read "Molly Jo Stanley".

Molly Jo Stanley  
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