

U.S. Fish and Wildlife Service
Federal Register Number 2025-16688
Docket Number FWS-R4-ES-2025-0210
Southern Hognose Snake Proposed Listing 4(d) Rule Comments
October 28, 2025

To whom it may concern,

This public comment is submitted on behalf of the Gopher Tortoise Council, a nonprofit organization formed in 1978 by a group of Southeastern biologists and other citizens concerned with the decline of the gopher tortoise. The goals of the Council are: (1) to offer professional advice for management, conservation, and protection of gopher tortoises; (2) to encourage the study of the life history, ecology, behavior, physiology, and management of gopher tortoises and other upland species; (3) to conduct active public information and conservation education programs; (4) to seek effective protection of the gopher tortoise and other upland species throughout the Southeastern United States.

The Gopher Tortoise Council's Upland Snake Committee dedicates itself to educating others about the importance of upland snake species and their conservation, which includes the Southern Hognose Snake (*Heterodon simus*). Members of the Committee, along with general members and leaders of the Gopher Tortoise Council include most, if not all, of the individuals who have conducted research on *H. simus* over the past thirty years and have collectively interacted with the species more than any other similar organization that exists.

We collectively agree that listing *Heterodon simus* as threatened under the Endangered Species Act is warranted. We have reviewed the 2024 Species Status Assessment (SSA) along with the U.S. Fish and Wildlife Service's 2025 12-month finding that the species warrants listing as "Threatened" under the U.S. Endangered Species Act. The Gopher Tortoise Council strongly agrees with the modeling approaches used in the SSA, and can confirm that these were based on the best available science. The SSA also clearly explains uncertainties in the data that might affect model projections. But even under the most conservative scenarios for land use change and climate change, this species is likely to decline dramatically.

Many of the best-remaining populations of Southern hognose snakes exist on public lands. The ability of these lands to continue to offer valuable habitat for the species depends upon the ability to manage these lands with prescribed fire. That ability will be determined by the level of development that occurs around those lands, and it would be unreasonable to expect that development of vacant, unprotected uplands in the Southeast will cease to continue. Furthermore, all of these public lands are bisected by roads. The impact of roads on slow-moving, upland snakes such as the Southern hognose snake is well-documented. Direct mortality and collection of individual snakes will continue for as long as roads, without adequate underpasses, exist in these areas. In other words, even in the most protected places within the range of the Southern hognose snake, declines are occurring. This, in our view, strongly suggests that efforts to further protect the species are absolutely warranted.

The reasons outlined above paint a negative picture for the future of the species, but this is a species that can be recovered if appropriate action is taken. Thus, we fully support the federal listing of the southern hognose snake as a threatened species.

Thank you for your consideration of this matter, and please do not hesitate to reach out to the Gopher Tortoise Council if our membership can be of any assistance as this listing is assessed.

Sincerely,

A handwritten signature in blue ink, appearing to read "H. J. Sash", written in a cursive style.

Sr. Co-chair GTC