

April 2, 2026

Will Meeks
Regional Director
Midwest Region
5600 American Blvd.
West Suite 990
Bloomington, MN55437-1458
will_meeks@fws.gov

Sharon Marino
Acting Regional Director
Northeast Region
300 Westgate Center Dr
Hadley, MA 01035
sharon_marino@fws.gov

Gina Shultz
Acting Assistant Director
Ecological Services
US Fish and Wildlife Service
5275 Leesburg Pike
Falls Church, VA, 22041
gina_shultz@fws.gov

Brian Nesvik
Director
U.S. Fish and Wildlife Service
MS: BPHC
5275 Leesburg Pike
Falls Church, VA 22041-3803
brian_nesvik@fws.gov

Sent via electronic mail

RE: Endangered Species Act listing of the Wood Turtle (*Glyptemys insculpta*)

Dear Director Nesvik, Regional Director Meeks, Acting Regional Director Marino, and Acting Assistant Director Shultz,

On behalf of the following organizations, we urge you to protect Wood Turtles (*Glyptemys insculpta*) as endangered under the Endangered Species Act and designate critical habitat concurrent with the listing.

Wood turtles (*Glyptemys insculpta*) are among the most endangered turtles in North America.¹ With sculpted, pyramidal brown carapaces, yellowish plastrons with dark markings, and bright orange to red coloring on their necks and legs, these turtles have been targeted by poachers and others for the pet trade for decades. Wood turtles have likely lost more than half of their suitable habitat over the last century and a half due to urbanization and agriculture, and remaining sites face new threats from development, roads, fragmentation, poaching, and predation. Populations have experienced a 50 percent decline in less than ten years.²

In its September 18, 2015, 90-day petition finding, the U.S. Fish and Wildlife Service found that the listing petition for the wood turtle presented substantial scientific or commercial information, indicating that listing the species as endangered or threatened may be warranted based on the five listing factors under section 4(a)(1) of the Act.³ The U.S. Fish and Wildlife Service also stated that it would review the species status by 2023 to make a listing determination.⁴

Wood turtle populations throughout the range of the species have been harmed by habitat fragmentation and habitat loss.⁵ Additional threats include poaching, predation, roads, pollution, and climate change. Loss of subpopulations and sites, extremely low juvenile survival rates, and little to no recruitment have resulted in dwindling, aging turtle populations struggling for survival.

Existing protections have done little to slow this decline. Despite efforts by federal and state agencies, the wood turtle's numbers have dropped by at least 50 percent in the past decade. NatureServe has assessed the wood turtle as Imperiled (G2) across its entire range: subpopulations in Iowa are Critically Imperiled (S1).⁶ IUCN lists the wood turtle as Endangered and in decline.⁷

All five factors identified in Section 4 of the Endangered Species Act are contributing to the wood turtle's crash: habitat destruction, overutilization, disease and predation, inadequacy of existing regulations, and natural and manmade factors.⁸ Due to declining population trends and growing threats, wood turtles will ultimately go extinct in the wild unless they are protected as endangered species.

¹ Willey Lisbeth L., et. al., (2022). Distribution models combined with standardized surveys reveal widespread habitat loss in a threatened turtle species (pg. 2).

² Willey, Lisbeth L., et. al., (2021). *Demography and Reproduction*; from Biology and Conservation of the Wood Turtle / Michael T. Jones ; Lisabeth L. Willey, editors. Available at fs.usda.gov/nrs/pubs/jrnl/2021/nrs_2021_willey_002.pdf.

³ 80 Fed Reg. 56, 431.

⁴ U.S. Fish and Wildlife Service. (2026, March 15). *Wood Turtle*. <https://www.fws.gov/species/wood-turtle-glyptemys-insculpta>.

⁵ Willey, Lisbeth L., et. al., (2021). Biology and Conservation of the Wood Turtle / Michael T. Jones ; Lisabeth L. Willey, editors. page 3.

⁶ NatureServe. 2026. https://explorer.natureserve.org/Taxon/ELEMENT_GLOBAL.2.100280/Glyptemys_insculpta (accessed March 15, 2026).

⁷ IUCN Red List. (2026). Wood Turtle, *Glyptemys insculpta*. <https://www.iucnredlist.org/species/4965/97416259>.

⁸ ESA Section 4 (16 U.S.C. § 1533(a)(1)).

Sincerely,

Tara Zuardo
Senior Advocate
Center for Biological Diversity

Chance Cutrano
Resource Renewal Institute

Dan Silver
Endangered Habitats League

Tara Thornton
Endangered Species Coalition

Laura Jackson
Juniata Valley Audubon Society

Laura Jackson
Save Our Allegheny Ridges

Sydney Wilkins
Klamath-Siskiyou Wildlands Center

Predator Defense

Leora Berman
Turtle Guardians

Friends of Blackwater, Inc.

Friends of Merrymeeting Bay
Ed Friedman
Friends of Merrymeeting Bay

Dr. Steven Krichbaum

Hardy Kern
American Bird Conservancy

Lori Andresen
Save Our Sky Blue Waters

Chuck Willer
Coast Range Association

Bonni McKeown
Stewards of the Potomac Highlands

Buffalo Bruce
Western Nebraska Resources Council

Matt Peters
Administrative Coordinator, Heartwood

Sara Sass

Jayne Kleissler
Allegheny Forest Defense Project

Chris Bachman
Conservation Director, Yaak Valley Forest Council

Heartwood

Katie Seaberg
IFAW

Michelle Lute
Wildlife for All

Denise Mosca

Willow Kasner
Emerald Curtain Collective

Susan Crockett
Middle Peninsula Master Naturalist

Elizabeth Krebill Fox

Dani Purvis
Wild Cumberland

Nancy Warren
National Wolfwatcher Coalition

Environmental Protection Information Center (EPIC)

Nick Lund
Maine Audubon

Calandra Waters Lake
Wild Virginia

Kate Dylewsky
Animal Welfare Institute

Dr. Steven Krichbaum
Heartwood

Gary S. Casper
Mequon Nature Preserve

John Moriarty, Retired

Stefanie Nadeau, Nadeau Consulting

Haley Spargur
UW Green Bay alumnus

Cameron W Gale

J.D. Phillips

Dan Shaffer
Allegheny-Blue Ridge Alliance (ABRA)

Amber Powless
Oneida Nation

Alaina Noll
Oneida Nation

Bruce Kingsbury
Waterfield Environmental Resources Center

Northwoods Wildlife Consulting

Lena Carlson
Wisconsin Department of Natural Resources

Pete Havlik

Annunziata Feldis

Renee Papesh

Genevieve Adamski

Summer Olsen

Mallary Bade

Olivia Olsen
Neighbors Union

Bailey Kroll

Bernard J Havlik

Bozena Scheidel
Willow Collective

Phoebe Burchill

Colleen M. Trumper

Diane Koosed

Carolyn Pralle
Wisconsin's Green Fire

Danielle Bell
Native Roots LLC

Beth Mittermaier
earthlimited

Virginia Wilderness Committee

Andrew Holycross
Natura Prima, LLC