



JOHN BEL EDWARDS
GOVERNOR

State of Louisiana
DEPARTMENT OF WILDLIFE AND FISHERIES

CHARLES J. MELANCON
SECRETARY

December 20, 2016

Elise Pautler Bennett
Reptile and Amphibian Staff Attorney
Center for Biological Diversity
P.O. Box 2155
St. Petersburg, FL 33731

Dear Mrs. Bennett:

Staff members of the Louisiana Department of Wildlife & Fisheries (LDWF) have reviewed your Petition to ban the commercial use of wild-caught turtles. Our Department's response follows.

The Petition states that "more than 16,000,000 wild-caught turtles" were exported from Louisiana during the past five years. We are in possession of the same data (LEMIS) from which your numbers are derived, and are confident that approximately 97% of these turtles are not wild-caught, but are hatchlings that were, and are, produced from existing breeding stock on licensed Louisiana Turtle Farms. Since the early 2000s the United States Fish and Wildlife Service has required that farmed turtles be designated as "wild-caught" (W) on export forms, despite the fact that they are produced from long-term captives. That requirement accounts for the discrepancy in what is being reported, and what is truly being removed from the wild. Please be assured that LDWF would consider the removal of millions of turtles each year from our waters to be unsustainable.

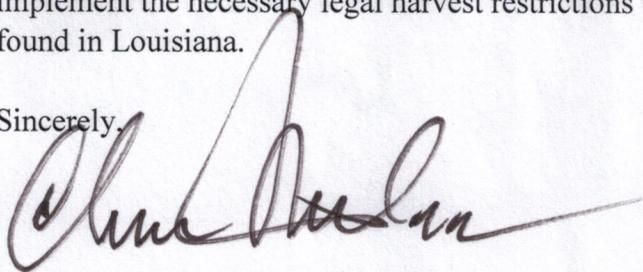
The Petition states that "wild turtle populations cannot withstand unlimited commercial collection." Louisiana turtle trappers and farmers operate within a demand-based, rather than supply-based system. Most Louisiana turtle species are not provided harvest limits because the demand is far below the supply level, or the level of take at which the populations could be sustained. At a point at which the demand for a particular species reduces the management buffer toward supply, our Department acts in favor of the species, as with the Razor-backed Musk Turtle rule cited in the Petition. Also stated in the petition is that studies demonstrate the harmful impacts that harvest may have on turtles. Our staff has been aware of the same studies as they are published and the empirical results of the long history of turtle use in Louisiana does not corroborate the predictions of the cited studies.

The Petition warns that "turtle meat poses a human health risk." The Petition does not document any instance(s) in which a person has become ill from consuming turtle meat. Likewise, our Department is not aware of any specific cases and there are currently no state health advisories issued for turtle meat consumption.

The Petition states that "numerous state wildlife agencies have ended commercial harvest of native freshwater turtles." While this is true other states allow commercial use of some turtle species. Each state operates according to the best science, and the best interests of its constituents while keeping the wildlife resources as its first priority. It would be imprudent for LDWF to manage Louisiana's resources according to the strategies of other states which have different biotic, demographic and political landscapes.

Our biologists remain informed about the use and population status of Louisiana's turtles, and manage this resource accordingly. You have noted our recent rule change that placed a moratorium on harvest of Razor-backed Musk Turtles that resulted from an evaluation of turtle harvest by our Department's biologists. Please be assured that we are actively studying the turtle populations within the state to assess the impacts of harvest, contaminants and other environmental impacts on species abundance. If a situation warrants we have the capability to implement the necessary legal harvest restrictions to ensure survival of each species of turtles found in Louisiana.

Sincerely,

A handwritten signature in dark ink, appearing to read "Charlie Melancon", with a long, sweeping horizontal line extending to the right.

Charles J. "Charlie" Melancon, Secretary