

Dear USFWS,

While Spider tortoises (*Pyxis arachnoides*) and Flat-tailed tortoises (*Pyxis planicauda*) do need protection in their home range, adding them to the ESA does little to protect them in Madagascar. There are accounts of confiscated shipments out of Madagascar, but *Pyxis arachnoides* and *Pyxis planicauda* are rarely included. Also, nothing indicates any of these shipments were heading to the United States.

These species have very low annual reproduction (typically 1-2 clutches of one egg) and huge efforts are being made by the private sector, NGOs and zoos to bring all the captive animals in the U.S. into breeding programs. There are very few offspring in the open market as most breeders working with them have them listed in the AZA studbook and are already cooperatively working together. Restricting trade in the U.S. is an unnecessary regulation for an already taxed USFWS that is struggling to process Captive-Bred Wildlife (CBW) applications and renewals in a timely manner.

Additionally, I am concerned about the organizations that brought this forward. When reviewing their published petition at

[http://www.wildearthguardians.org/site/DocServer/Spider\\_Tortoise\\_Petition\\_FoA\\_WG.pdf?docID=10705](http://www.wildearthguardians.org/site/DocServer/Spider_Tortoise_Petition_FoA_WG.pdf?docID=10705), the animal pictured (and cited to the Turtle Survival Alliance: TSA) is not a *Pyxis*. It is a Burmese Star tortoise (*Geochelone platynota*). This makes one question their credibility and true interest in the species when they are unable to identify it properly.

Listing these species under ESA will actually harm the captive reproduction and survival of the species in captivity. If the Madagascar populations are devastated due to habitat loss, human development, increasing human population, pollution or other factors, all that will remain are the captive populations. FWS must continue to allow captive-bred animals to be readily implemented into breeding programs.

Respectfully submitted,