



## THE WILDLIFE SOCIETY

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July 21, 2014

Public Comments Processing

Attn: Docket No. FWS-R9-FHC-2008-0015

Division of Policy and Directives Management

U.S. Fish and Wildlife Service

Arlington, Virginia 22203-1610

Submitted online at: [www.regulations.gov](http://www.regulations.gov)

### **RE: Injurious Wildlife Species; Listing the Reticulated Python, Three Anaconda Species, and the Boa Constrictor as Injurious Reptiles; Proposed Rule**

Dear Sir/Madam,

The Wildlife Society (TWS) is writing to express our strong support for the above-referenced U.S. Fish and Wildlife Service (FWS) proposed rule to issue a final regulation listing the reticulated python, boa constrictor, and three anaconda species as injurious under the Lacey Act, 18 USC 42. TWS strongly urges prompt listing of these invasive snakes as injurious to prevent their further import and spread throughout vulnerable habitats in the United States.

The Wildlife Society was founded in 1937 and is a non-profit scientific and educational association of nearly 10,000 professional wildlife biologists and managers, dedicated to excellence in wildlife stewardship through science and education. Our mission is to represent and serve the professional community of scientists, managers, educators, technicians, planners, and others who work actively to study, manage, and conserve wildlife and habitats worldwide.

In 2010, FWS issued a proposed rule that would have listed nine invasive snake species as injurious under the Lacey Act including the five under consideration now. The Wildlife Society and other organizations responded with detailed comments supporting the listing of all nine species, citing a 2009 USGS report outlining the invasive potential of these species<sup>1</sup>. While only four species were listed as injurious in the final rule in 2012, our view that all nine should be listed has not changed. This letter will supplement comments made in 2010 with new science and information that attest to the importance of issuing a final rule listing the remaining five snake species as injurious. Our nation's natural resources, including endangered and sensitive species, remain at risk by the continued importation and trade of these highly invasive species.

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<sup>1</sup> R.N. Reed & G.H. Rodda. (2009). Giant constrictors: biological and management profiles and an establishment risk assessment for nine large species of pythons, anacondas, and the boa constrictor: U.S. Geological Survey Open-File Report 2009-1202 (USGS)

## **New studies show invasive potential of the snake species**

A study released in 2012, which analyzed the establishment success of invasive reptiles, found that previously agreed upon rates were underestimating potential invasiveness.<sup>2</sup> The study states that the danger of establishment is actually more than 40% as opposed to the previously agreed upon 10%.

Other recent studies have proven the ability of one of the five snake species at issue, the boa constrictor, to establish populations and proliferate successfully. Not only have they established more introduced populations in the United States than any other constrictor species, but evidence is mounting that they are not limited to South Florida. A 2013 study documented growing populations in Puerto Rico.<sup>3</sup> While in Hawaii, boas are found in the wild regularly.<sup>4</sup>

When these snakes establish populations, they severely impact native wildlife. A recent study found that the Burmese python is responsible for catastrophic declines – some over 99 percent – in small and medium mammal species in the Everglades.<sup>5</sup> Another study links a well-documented bird decline in the Everglades to the proliferation of the python.<sup>6</sup>

In summary, new studies confirm and enhance the point that all of these snake species are highly invasive and will severely damage native ecosystems. High establishment rates and evidence of widespread proliferation lend urgency to listing them as injurious.

## **Low economic impact of lost trade**

Some individuals and groups contend that listing these snakes as injurious will have a negative impact on the reptile pet industry, based on a report commissioned by the U.S. Association of Reptile Keepers.<sup>7</sup> However, the report's economic analysis is both unreliable and biased. Much of the analysis is grossly inflated because it ignores substitution effects while overestimating the share of the reptile industry that these specific snake species make up.

Furthermore, a report conducted for the Humane Society of the United States by a third party economics firm, Blue Sky Consulting Group, indicates that listing these snake species would not have a drastic effect on small businesses that deal with the sale of reptiles. The report describes how customers will most likely buy other reptiles that are less invasive and still available in trade, resulting in no net loss of revenue. Another recent study argues that restricting invasive

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<sup>2</sup> Rodrigo B. Ferreira et. al. (2012). Global assessment of establishment success for amphibian and reptile invaders. *Wildlife Research* 39(7), 637-640.

<sup>3</sup> Reynolds et al. (2013). Genetic analysis of a novel invasion of Puerto Rico by an exotic constricting snake. *Biological Invasions* 15, 953-959

<sup>4</sup> USGS, supra note 1

<sup>5</sup> Michael E. Dorcas et. Al. (2012). Severe mammal declines coincide with proliferation of invasive Burmese pythons in Everglades National Park. *PNAS* 109(7), 2418-2418

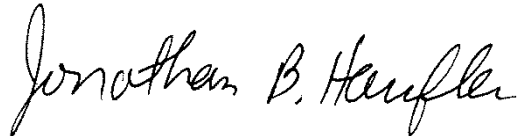
<sup>6</sup> Ray W. Snow et. Al. (2011). Birds consumed by the invasive Burmese python in Everglades National Park, Florida, USA. *The Wilson Journal of Ornithology* 123(10), 126-128

<sup>7</sup> A. H. Collis, and R. N. Fenili. (2011). *The Modern U.S. Reptile Industry*. Report for USARK by Georgetown Economic Services. Online at [www.whitehouse.gov/omb/1018\\_meeting\\_04182011](http://www.whitehouse.gov/omb/1018_meeting_04182011)

species actually results in an economic benefit.<sup>8</sup> The costs associated with eradication and recovery far outweighs industry losses.

Thank you for considering the recommendations of wildlife professionals and working to reduce the impact of invasive species on native wildlife populations and economic activity. Please contact Laura Bies, Director of Government Affairs at (301) 897-9110 x308 if you require further information or have any additional question.

Sincerely,

A handwritten signature in black ink that reads "Jonathan B. Haufler". The signature is written in a cursive style with a large, prominent initial 'J'.

Jonathan B. Haufler  
President

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<sup>8</sup>P. T. Jenkins. (2012). Invasive animals and wildlife pathogens in the United States: the economic case for more risk assessments and regulation. *Biological Invasions* DOI: 10.1007/s10530-012-0296-8