



## **THE WILDLIFE SOCIETY**

5410 Grosvenor Lane • Bethesda, MD 20814-2144

Tel: (301) 897-9770 • Fax: (301) 530-2471

E-mail: [tw@wildlife.org](mailto:tw@wildlife.org)

May 14, 2012

John Davis  
Wildlife Diversity Program Director  
Texas Parks and Wildlife Department  
4200 Smith School Rd.  
Austin, TX 78744

Dear Mr. Davis:

The Wildlife Society appreciates the opportunity to offer our input on the Texas Parks and Wildlife Department's proposal to regulate the means of take for nongame wildlife. Founded in 1937, The Wildlife Society is a non-profit scientific and educational association of nearly 11,000 wildlife professionals and students, 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.

TWS would like to express support for the development and implementation of regulations against the use of noxious chemicals or substances (petrochemicals, bleach, etc.) as a means of legal take for wildlife in Texas. We are concerned about the collateral damage such practices have on the health of native wildlife populations that co-exist in habitats occupied by targeted species. The technique known as "gassing" is of specific concern due to the widespread popularity of its use in the rattlesnake trade.

Gassing is a seemingly simple, cheap, and effective method for extracting venomous snakes from their protective nesting habitats. One can pour a few ounces of gasoline, kerosene, bleach, or other chemicals into a natural micro-habitat (cave, crevice, or burrow) to force the inhabitants to escape the toxic fumes. The weakened animal can then be easily captured. If not caught immediately or killed by the fumes the animals are more susceptible to predation or desiccation once outside the retreat.

Rattlesnakes have shown to be heavily reliant on pre-constructed burrows for nesting habitat and gassing is known to render these denning sites uninhabitable for years. If the snake does not flee the burrow, the burrow will often be excavated in the search for the dazed or dead rattler.

Critical habitats are being destroyed by using gassing and digging as method of take for rattlesnakes. This technique impacts hundreds of species of invertebrates and vertebrates that have been documented using and/or occupying these habitats. Numerous federally listed species and state-level species of greatest conservation need inhabit these micro-habitats, including burrowing owls, timber rattlesnakes, Texas tortoises, and 137 karst-dwelling invertebrates.

There are currently no prohibitions on the take methods for commercial or personal collection of amphibians or reptiles. Restricting take to prohibit the use of toxic chemicals will limit the unnecessary toxic exposure of non-target animals and will secure critical habitat for hundreds of species.

Thank you for considering the views of wildlife professionals. The Wildlife Society is committed to providing assistance on this issue and we are happy to serve as a resource for the Texas Parks and Wildlife. If you have any questions or need additional assistance, please contact Ms. Terra Rentz, Deputy Director of Government Affairs at [terra@wildlife.org](mailto:terra@wildlife.org).

Sincerely,

A handwritten signature in cursive script that reads "Paul R. Krausman". The signature is written in black ink and is positioned below the word "Sincerely,".

Paul R. Krausman, CWB  
President