CENTER for BIOLOGICAL DIVERSITY Because life is good.

July 24, 2014

Submitted via Federal eRulemaking Portal and U.S. Mail

Public Comments Processing
Attn: Docket No. FWS-R9-FHC-2008-0015
Division of Policy and Directives Management
U.S. Fish and Wildlife Service
4401 N. Fairfax Drive, Suite 222
Arlington, VA 22203.

Re: Comments on Injurious Wildlife Species: Addition of the Reticulated Python, Three Anaconda Species, and the Boa Constrictor - 79 Fed. Reg. 35719 (June 24, 2014)

To Whom It May Concern:

On behalf of the Center for Biological Diversity ("Center"), I am writing to offer support for listing the reticulated python, three anaconda species, and the boa constrictor as injurious reptiles. The Center is a national, nonprofit organization with over 775,000 members and online activists whose mission is to protect and restore endangered species and their habitats through science, policy, education, advocacy, and environmental law.

The U.S. Fish and Wildlife Service issued a proposed rule to list nine large constrictor snakes as injurious under the Lacey Act in 2010. Two years later, the Service issued a final rule providing that only four of those nine species would be listed as injurious under the Lacey Act: Burmese pythons, yellow anacondas, and northern and southern African pythons. The Service explained that the agency was still considering the remaining five species of snakes: reticulated python, the DeSchauensee's anaconda, the green anaconda, the Beni anaconda, and the boa constrictor. Then, in June of 2014, the Service re-opened the comment period on the proposed rule.

The Center fully supports the listing of the remaining five species of snakes. The 2010 proposed rule summarized the available science, which shows that all nine species present a "high" or "medium" risk of becoming invasive. Since then additional science further supports the need to list the remaining five species as injurious:

- A 2012 published study concluded that more than 40 percent of introduced reptiles successfully establish wild populations, which is higher than previously thought. Ferreira, R.B., C.M. Callahan, S.A. Poessel, and K.H. Beard. 2012. Global assessment of establishment success for amphibian and reptile invaders. Wildlife Research 39(7): 637-640 (available at http://www.publish.csiro.au/?paper=WR12051).

- After a decade of colonization, pythons in the Everglades have caused as much as 99 percent declines of populations of the area's small and medium sized mammals. Dorcas, M.E., J.D. Willson, R.N. Reed, R.W. Snow, M.R. Rochforde, M.A. Miller, W.E. Meshaka, Jr., P.T. Andreadis, F.J. Mazzotti, C.M. Romagosa, and K.M. Hart. 2012. Severe mammal declines coincide with proliferation of invasive Burmese pythons in Everglades National Park. PNAS 109(7): 2418 – 2418 (available at http://www.pnas.org/content/early/2012/01/23/1115226109.full.pdf+html).

- Researchers identified 25 species of birds in the stomachs of invasive burmese pythons in the Everglades, including four species of special concern in Florida and a wood stork, which is listed as federally endangered. Dove, C.J., R.W. Snow, M.R. Rochford, and F.J. Mazzotti. 2011. Birds Consumed by the Invasive Burmese Python in Everglades National Park, Florida, USA. Wilson Journal of Ornithology 123(1): 126-128 (available at http://www.evergladeshub.com/lit/pdf11/Dove11wilsJornithol123-126-31-PythonsEatBirds.pdf).

- Hundreds of dangerous incidents have been documented that involve large constrictor snakes held in captivity, including the killing of children and pets. Humane Society of the United States. Constrictor Snake Incidents (available at: www.humanesociety.org/assets/pdfs/wildlife/captive/captive-constrictor-snake-incidents.pdf).

- Boa constrictors have established a population in western Puerto Rico and threaten several species of rare and endemic wildlife, including these ESA-listed herpetofauna: Coquí llanero (*Eleutherodactylus juanariveroi*), Golden coquí (*Eleutherodactylus jasper*), Puerto Rican crested toad (*Peltrophryne lemur*), and the Puerto Rican boa (*Epicrates inornatus*). As such, the threat of invasion is not limited to south Florida or to the Burmese python. Reynolds, R.G., A.R. Puente-Rolon, R.N. Reed, L.J. Revell. 2013. Genetic analysis of a novel invasion of Puerto Rico by an exotic constricting snake. Biological Invasions 15: 953-959 (available at http://faculty.umb.edu/liam.revell/pdfs/Reynolds_etal_2013.BiolInv.pdf).

Please note that over the last several months approximately 30,000 members and supporters of the Center sent letters to Secretary Sally Jewell asking that the remaining five snake species be listed as injurious. Please add those comment letters to the official record on this rulemaking. Thank you for this opportunity to comment on this proposed rule.

Sincerely,

Collette L. Adkins Giese
Senior Amphibian and Reptile Attorney
Center for Biological Diversity