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April 28, 2008

Public Comments Processing
Division of Policy and Directives Management
U.S. Fish and Wildlife Service
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ATTN: RIN 1018-AV68

I am writing on behalf of the Association of Zoos and Aquariums (AZA) and its Snake Taxon Advisory Group in response to the recent USFWS request for public comments on the proposed addition of Python, Boa and *Eunectes* genera to the list of injurious wildlife under the Lacey Act. An injurious wildlife listing would prohibit the importation into, or transportation between States, the District of Columbia, the Commonwealth of Puerto Rico, or any territory or possession of the U.S. without a scientific, medical, educational or zoological permit. AZA has serious concerns with this proposed listing and its impact on our members.

AZA is a non-profit organization comprised of 218 accredited institutions dedicated to the advancement of zoos and aquariums in the areas of animal care and husbandry, conservation, education, science and recreation. AZA institutions draw over 156 million visitors annually and have more than eight million zoo and aquarium members who provide almost \$100 million in support. These institutions teach more than 12 million people each year in living classrooms, dedicate millions annually to education, conservation and scientific research programs and support over 1,800 field conservation and research projects in 80 countries.

AZA members also have a strong commitment to conservation education and research. AZA has pioneered and established the Species Survival Plan (SSP) program—a long-term plan involving genetically diverse breeding, habitat preservation, public education, field conservation and supportive research to ensure survival for many threatened and endangered species from around the world. Currently, AZA member institutions are involved in 113 different SSP programs throughout the world covering 181 species, including Virgin Island boa, Aruba Island rattlesnake, Eastern Massasauga rattlesnake, and Louisiana pine snake. It is in this context that we submit the following comments.

AZA believes that at this time, adding boa, python and *Eunectes* species to the list of injurious wildlife would only create additional work for the USFWS permitting office resulting in increased processing delays. This could delay necessary national and international animal movements that need to be made in order to pair up animals identified in AZA Species Survival/Population Management Plans. If these animals are not moved in a timely manner, significant delays could result in important reproduction programs for these species.

Additionally, AZA strongly believes that this is a Florida issue and should be treated as such through the State regulatory process. This listing could impact regulatory and law enforcement authorities in all 50 states when in reality, it appears that this should be addressed on a state by state basis as needed.

Specific Questions raised by the USFWS:

What regulations does your State have pertaining to the use, transport and production of Python, Boa and *Eunectes* genera?

Currently Florida, Texas, California and Missouri have regulations on various species. Some pertain to size limits, etc. Florida requires certain species, including zoo animals, to have transponders implanted and to be registered. This applies to the species *P. molurus*, *P. reticulatus*, *P. sebae*, *Eunectes murinus*, *Morelia amethystina*, *Varanus niloticus*. We have no detailed information on the regulations of the other states at this time.

How many species in the genera Python, Boa and *Eunectes* are currently in production for wholesale or retail sale?

Asian rock python, *Python molurus*
Indian python, *P. m. molurus*
Burmese python, *P. m. bivittatus*
Reticulated python, *Python reticulatus*
Reticulated python, *P. r. reticulatus*
Bonerate Islands python, *P. r. jampeanus*
Selayar python, *P. r. saputrai*
Lesser Sundas python, *Python timoriensis*
Blood python, *Python brongersmai*
Borneo python, *Python breitensteini*
Sumatran python, *Python curtus*
Ball python, *Python regius*
African rock python, *Python sebae*
Southern African python, *Python natalensis*
Southwestern desert python, *Python anchietae*

Boa constrictor, *Boa constrictor*
South American boa, *B. c. constrictor*
Common boa, *B. c. imperator*
St Lucia boa, *B. c. orophias*
Dominican clouded boa, *B. c. nebulosa*
Rio Tumbes boa, *B. c. longicauda*
Ecuadorian boa, *B. c. melanogaster* (status uncertain)
Peruvian coastal boa, *B. c. ortonii*
Bolivian boa, *B. c. amarali*
Argentine boa, *B. c. occidentalis*
Bay of Panama boa, *B. c. subogae*

Green anaconda, *Eunectes murinus*
Green anaconda, *E. m. murinus*
E. m. gigas
Yellow anaconda, *Eunectes notaeus*

What native species have been impacted and how, by the introduction of python, boa, and *Eunectes* species?

This is from the Florida Wildlife Conservation Commission officer Scott Hardin:

"There have been no studies documenting landscape impacts, i.e., reductions in population abundance or structure by Burmese pythons. There is a legitimate concern about predation on Key Largo woodrats (endangered species), four of which have been consumed by pythons. Although the origin of the pythons is not specifically known, it is likely that some of them are migrants from the Everglades population.

We believe that FWC's Reptiles of Concern (*P. molurus*, *P. reticulatus*, *P. sebae*, *Eunectes murinus*, *Morelia amethystina*, *Varanus niloticus*) regulations will be effective in preventing any future populations from becoming established. We are concerned about unintended consequences of listing pythons as a federal injurious species. Invariably, 'uplisting' has led to a wave of releases (e.g., walking catfish, snakeheads). Furthermore, listing pythons would mean all the snakes in Florida would have to remain in Florida - legally, that is.

Other than the isolated Boa constrictor population contained within the Deering Estates, there are no other reproducing non-native constrictors that we are aware of. We continue to record individual snakes (ball pythons, Burmese, reticulated pythons, an occasional Boa, and an infrequent anaconda) as we have for decades. We have no evidence of reproduction of any of these species."

In closing, it is somewhat disconcerting that the USFWS recently proposed a major increase in permit fees for the inspection of imported and exported wildlife in order to support its lagging law enforcement budget. Now the Service is being asked to further tax its law enforcement resources by taking a seemingly State-based issue and expanding it to the entire U.S. and its territories and possessions.

Thank you for the opportunity to comment.

Steve Olson
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