



# AMERICAN BIRD CONSERVANCY

CONSERVING WILD BIRDS AND THEIR HABITATS THROUGHOUT THE AMERICAS

April 29, 2008

Public Comments Processing  
Attn: RIN 1018-AV68  
Division of Policy and Directives Management  
U.S. Fish and Wildlife Service  
4401 North Fairfax Drive, Suite 222,  
Arlington, VA 22203.

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Thank you for the opportunity to comment on the U.S. Fish and Wildlife Service's Notice of Inquiry [FWS-R9-FHC-2008-0015; 94410-1342-0000-N3] to consider adding snakes in the *Python*, *Boa*, and *Eunectes* genera to the injurious wildlife list under the Lacey Act. American Bird Conservancy (ABC) believes this action is necessary to prevent the further introduction of these aggressive, invasive predators that are known to be highly adaptable to new environments and consume a wide variety of prey including various native mammal, amphibian, lizard, and bird species.

ABC is a 501(c) 3 non-profit organization dedicated to the conservation of wild native birds in the Americas. Founded in 1994, ABC has long been a leader in Partners in Flight and the North American Bird Conservation Initiative, and is the only U.S.-based group dedicated solely to overcoming the greatest threats facing native birds in the Western Hemisphere. ABC has 7,000 members and offices in Virginia and the District of Columbia; and staff in North Carolina, Indiana, Missouri, Montana, Vermont, Kentucky, Idaho, and Oregon.

Populations of long-lived and highly fecund invasive snake species, such as the Burmese python (*Python molurus*), have great potential to proliferate once introduced outside their native range outside, representing an ecological and economic disaster that can quickly overtake even the most far-reaching eradication efforts to protect endangered species. Though not from one of the three genera in question, one example of this potential effect can be seen from the brown tree snake (*Boiga irregularis*), which was accidentally introduced to Guam from its native range of New Guinea and Australia in the 1950s. Its impacts include not only major disruptions of electric power transmission, telephone service, military operations, computers, and tourism, but also devastation of the island's bird life. Preying on eggs and birds alike, the brown tree snake has caused the extinction of nine of the eleven native land bird species on Guam. Its predation of native birds has been so complete that the brown tree snake now survives by feeding almost exclusively on the island's lizard species.



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In the U.S., significant portions of land and water under federal jurisdiction are thoroughly infested with harmful non-native species which are subsequently able to spread unchecked to adjacent private, public lands and waters. To date, invasive species have infested 100 million acres of the American landscape, and each year they continue to degrade or eliminate native vegetation and dependent wildlife in an area equal to a strip of land two miles wide stretching from coast to coast. Unfortunately, under current law, native fish and wildlife are not directly protected from harmful non-native species on federal or any other lands. Therefore, it is necessary to add snakes in the *Python*, *Boa*, and *Eunectes* genera to the list of injurious wildlife under the Lacey Act as the most risk-averse action that can be taken to protect our nation's native birds, which have been shown to constitute the main prey items<sup>1</sup>.

According to a recent study<sup>2</sup> of the stomach and lower gastro-intestinal tracts of 56 captured Burmese pythons in or adjacent to Everglades National Park, 50 were found to have eaten multiple bird species, including: Anhinga, American Coot, Pied-billed Grebe, Limpkin, King Rail, Purple Gallinule, Great Blue Heron, White Ibis, Red-winged Blackbird, Virginia Rail, Great Egret, Magnificent Frigatebird, Clapper Rail, House Wren. It should be noted that the White Ibis and Limpkin are Florida Species of Conservation Concern, and the King Rail and the Clapper Rail are on the ABC-National Audubon Society WatchList. Though not currently found to be prey of the Burmese python, the study notes that these snakes sightings and captures have occurred in high priority areas for birds, including near the rookeries of the Wood Stork, a species listed as endangered under the Endangered Species Act.

Lastly, we note the recently released climate maps by the U.S. Geological Survey which found the Burmese python could find suitable habitat, comparable to that of the pythons' native range in Asia, in the southern one-third of the lower 48 States. Should these snakes become more widely established they will further exacerbate the threat they pose to the health and abundance of many bird species. Therefore, we strongly urge the U.S. Fish and Wildlife Service add the snakes in the *Python*, *Boa*, and *Eunectes* genera to the injurious wildlife list under the Lacey Act.

Sincerely,



George Fenwick  
President  
American Bird Conservancy

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<sup>1</sup> Bhatt, K. & Choudhury, B.C. (1993). The diel activity patten of Indian python (*Python molurus molurus* Linn.) at Keoladeo National Park, Bharatpur, Rajasthan, J. Bombay nat. Hist. Soc. 90. 395-403

<sup>2</sup> Snow, R. W., Brien, M. L., Cherkiss, M. S., Wilkins, L., and Mazzotti, F. J. 2007. Dietary habits of Burmese python, *Python molurus bivittatus*, from Everglades National Park, Florida. Herpetological Bulletin. 101: 5-7.