

World Museum of Natural History

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24 April 2008

RIN 1018-AV68, Division of Policy and Directives Management, U.S.
Fish and Wildlife Service
4401 North Fairfax Drive
Suite 222
Arlington, Va 22203

Subject: comments regarding constrictor snakes in the Python, Boa and Eunectes genera for possible addition to the list of injurious wildlife under the lacey Act.

Dear Sirs:

A proposal by FWS to prohibit the importation of constrictor snakes in the Python, Boa and Eunectes genera was the result of a petition from the South Florida Water Management District regarding Burmese pythons that have escaped or been turned loose in southern Florida and have survived and reproduced in parts of south Florida, especially in the Everglades, resulting in having an impact on native wildlife there.

Constrictor snakes of the above mentioned genera should NOT be prohibited from importation under the FWS's list of injurious wildlife for some of the following reasons:

- 1). Constrictors of the three mentioned genera are tropical and sub-tropical species and except for areas of the U.S. such as south Florida which have a sub-tropical environment, escaped constrictors of these three genera would not survive the winters in most parts of the U.S.
- 2). Zoos as well as private breeders presently hold tens of thousands of captive constrictors of the three genera and many breeders produce offspring from these three genera which are sold, traded, etc. Each state has numerous breeders of snakes from these three genera. Any individual in any state could turn their captive animals loose, but doing so in most cases would condemn those snakes to a demise with onset of winter conditions.
- 3). Serious breeders of species and subspecies from the three genera are always looking for new blood-lines to be able to produce healthy offsprings. Also, color morphs and marking variations are seen in many species and subspecies of constrictors and such variations are sought after by serious breeders, commanding high prices for some of the rare color morphs and markings. Prohibiting importation of new animals would restrict the captive breeding of unusual variants.
- 4). Importation of constrictors as well as other forms of reptiles and amphibians from foreign countries has led to the discovery of new species and color and pattern variations not described before. Being able to establish breeding colonies of certain subspecies or new species of constrictors will help in the captive propagation of these new species or subspecies, resulting in preserving captive populations of some of these species or subspecies which may disappear in the wild thru loss of habitat in restricted endemic populations. Prohibiting the importation of constrictor genera could result in the loss of certain species or subspecies from the wild which could have otherwise been saved thru captive populations and propagation. New species or subspecies of constrictors may never be discovered because of a ban on importation of constrictor snakes.

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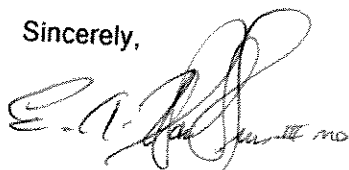
World Museum of Natural History: (cont)

Subject: comments regarding constrictor snakes in the Python, Boa and Eunectes genera for possible addition to the list of injurious wildlife under the Lacey Act. (continued from page 1)

Possible Solutions:

- A). Strengthen U.S. laws to prohibit placing of any foreign animal or plant life into the environment;
- B). Encourage states like Florida which have a problem with exotic plant and wildlife to strengthen their laws regarding deliberate contamination of their environment with exotic plants & wildlife
- C). States such as Florida that have this problem could make laws restricting the importation of certain plant and wildlife species into their states, a much better solution than a blanket U.S. ban which, in the case of constrictor snakes, would affect most of the states where this is not an issue of exotic constrictors being able to survive and breed in hostile winter climates.

Sincerely,



E. A. (Billy) Hankins III, M.D.
curator of vertebrate zoology
World Museum of Natural History

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