

March 30, 2010

Position: OPPOSE

TO:

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.

Regarding:

DEPARTMENT OF THE INTERIOR, Fish and Wildlife Service
50 CFR Part 16, RIN 1018-AV68, [FWS-R9-FHC-2008-0015]
[94140-1342-0000-N3]

Injurious Wildlife Species; Listing the Boa Constrictor, Four
Python Species, and Four Anaconda Species as Injurious Reptiles
AGENCY: Fish and Wildlife Service, Interior.
ACTION: Proposed rule; availability of draft environmental
assessment and draft economic analysis.

I am **OPPOSING** listing the above mentioned snakes as injurious wildlife.

-There is no public safety issue, as only 0.44 people are killed by captive non venomous snakes in the whole USA per year, all were pythons. Nobody got killed by boas or anacondas (see the enclosed statistics or this link <http://www.rexano.org//Education.htm>)

-Other than extreme southern tip of Florida, these snakes can NOT survive long term anywhere else in the mainland USA.

-In my own state of Nevada, the state wildlife agency already has the list of injurious species. Large constrictors are not on the list, because they can not survive in Nevada long term. The NV weather is too dry and too cold in winter. There is no prey base to feed large constrictors either. Our state doesn't need this proposed federal law. Let the individual states decide their list of injurious species.

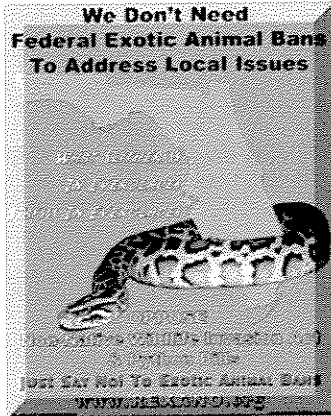
Sincerely
Zuzana Kukol, Nevada



REXANO, 205 N. Stephanie Street, Suite D # 131, Henderson, Nevada 89074

<http://www.REXANO.org>

CAPTIVE CONSTRICTOR SNAKES: PYTHONS AND BOAS IN THE USA Separating Facts from Fiction



In the last two decades, boas and pythons have become an increasingly popular exotic pet snakes across the USA. With the increased knowledge in their captive husbandry, there is now a bigger and better selection of captive bred snakes than ever before. By supplying the pet market with high quality healthy reptiles, the private breeders are greatly reducing the demand on the wild populations.

Unfortunately, special interest animal rights, AR, lobby groups are trying to increase their income by creating a public hysteria that the constrictors will invade the USA, and wipe out the human and native wildlife populations. This is simply not true, as the table below proves. The constrictor issue is limited to the southern tip of Florida, and should be dealt with on the local, not federal level.

YEARS: 1990-2008	SOUTH FLORIDA	NORTH FLORIDA	REST OF THE USA
CONSTRICTOR SNAKES KEPT AS PETS IN	YES	YES	YES
REPORTS OF STRAY CATS, DOGS & EXOTIC SNAKES AT LARGE IN	YES	YES	YES
EXOTIC CONSTRICTOR SURVIVING IN THE WILD	YES, in the south tip of Florida Everglades	NO	NO
FERAL CATS & STRAY DOGS SURVIVING IN	YES	YES	YES
HUMAN FATALITIES CAUSED BY CONSTRICTOR AT LARGE	0	0	0
*HUMAN FATALITIES CAUSED BY CAPTIVE CONSTRICTOR: YEARLY AND LIFETIME ODDS OF DYING BY CAPTIVE CONSTRICTOR IN THE USA	0	0	8 Total 0.44 person per year One year odds: 1 in 691,590,909 Lifetime odds: 1 in 8,981,700

* REXANO statistics only go thru 2008. Furthermore, the 2009 Florida Burmese python supposedly killing a toddler case is still under investigation.

http://www.rexano.org/Statistics/Constrictor_Captive_Snake_Fatality.pdf

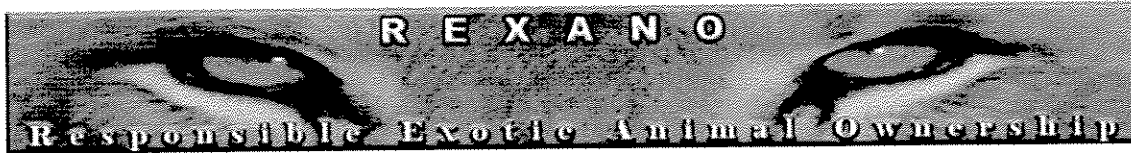
CONCLUSION: There is no public safety issue due to the captive or at large constrictor snakes. The extremely rare fatalities are to the owners and family members, NOT the general public, aka, voluntarily accepted hobby hazard. There is NO real need to address an isolated state issue thru the federal ban on exotic snakes, which will not only reduce the freedoms of Americans to choose what kind of pet to keep, but will also waste tax payers' money and kill animal industry and jobs.

More info: <http://www.rexano.org/Education.htm>

http://www.rexano.org/DA_FEDERAL.htm

http://www.rexano.org/Posters_JustSayNO/JSN_Gallery_6.htm

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USA: Captive Constrictor (Non - Venomous) Snakes Statistics Human Fatalities

REXANO, www.REXANO.org, only used fatality numbers since all deaths are (supposed to be) reported, and there is only one degree of death. The average life expectancy of 77 years was used to calculate the lifetime odds.

Table 1: Yearly Average and Lifetime odds of Being Killed by a Captive Constrictor Snake in the USA Based on 1990 – 2008 data

Number of captive constrictor snakes related human fatalities in the USA: 1990 - December 2008*	8
Average Human Deaths per Year	0.44
One - Year Odds**	1 in 691,590,909
Lifetime Odds**	1 in 8,981,700

*Based on news and animal industry reports

**Based on the current US population of 304,300,000

Table 2: Captive Constrictor Snake Related Human Fatalities in the USA by State: 1990 - 2008

STATE/ YEAR	CO	IL	IN	NY	OH	PA	VA	USA
2008							1	1
2006			1		1			2
2002	1							1
2001						1		1
1999		1						1
1996				1				1
1993	1							1
TOTAL: 1990-2008	2	1	1	1	1	1	1	8



Table 3: Captive Constrictor Snake Related Human Fatalities in the USA by the Type of the Snake: 1990 - 2008

YEAR STATE	2008	2006	2002	2001	1999	1996	1993
CO			Owner, Burmese python				Owner's brother Burmese python
IL					Owner's son, African rock python		
IN		Owner, Reticulated python					
NY						Owner, Burmese python	
OH		Owner, Burmese Python					
PA				Owner's daughter, Burmese python			
VA	Owner, Reticulated python						

REXANO statistics only go thru 2008. Furthermore, the 2009 Florida Burmese python supposedly killing a toddler case is still under investigation

Table 4: US Captive Constrictor Snake Related Human Fatalities by Type of the Snake and Percentage: 1990 – 2008

TYPE OF SNAKE	AFRICAN ROCK PYTHON	BURMESE PYTHON*	RETICULATED PYTHON	TOTAL
HUMAN DEATHS	1	5*	2	8
PERCENT OF TOTAL	12.5 %	62.5 %	25 %	100 %

**The larger number of Burmese pythons related fatalities doesn't mean that Burmese pythons are more dangerous than other large constricting snakes. More people likely keep and interact with captive Burmese pythons in the USA than with other large constrictors.*



Table 5: US Constrictor Snake Related Human Fatalities 1990 – 2008

YEAR/ STATE	RELATIONSHIP TO SNAKE	COMMENTS
2008 - VA	Woman/owner was killed by her Reticulated python while she was trying to give the 13-foot pet snake medication	Voluntarily accepted hobby/occupational hazard, no risk to uninvolved public
2006 – IN	Man/owner was crushed to death by his 14 foot pet Reticulated python	Voluntarily accepted hobby/occupational hazard, no risk to uninvolved public
2006 - OH	Man/owner was killed when his 13-foot Burmese python who wrapped itself around his neck	Voluntarily accepted hobby/occupational hazard, no risk to uninvolved public
2002 - CO	Man/owner died when his pet Burmese python strangled him by coiling around his head, neck and chest and squeezed him to death	Voluntarily accepted hobby/occupational hazard, no risk to uninvolved public
2001 – PA	Owners' 8-year-old daughter was squeezed to death by the family's 11-foot Burmese python. Her father was later found not guilty of involuntary manslaughter, but guilty of endangering the girl's welfare	Parents should always be held responsible. Death by a snake shouldn't be treated any differently than accidental death involving other activities. No risk to uninvolved public
1999 – IL	Owners' 3-year-old son was crushed to death after the family's 7 - foot African rock python got out of its cage (possibly through 2-inch gap in the aquarium's homemade wood lid) as the family slept. Judge issued a directed verdict -- innocent of child endangerment -just before attorneys were scheduled to begin closing arguments. The couple could have faced 10 years in prison. Supposedly, prosecutors had not presented enough evidence to even justify sending the matter to the jury.	Parents should always be held responsible. Death by a snake shouldn't be treated any differently than accidental death involving other activities. No risk to uninvolved public
1996 – NY	Man/owner, 19, was killed by his 13-foot Burmese python who might have possibly mistaken him for food	Voluntarily accepted hobby/occupational hazard, no risk to uninvolved public
1993 – CO	Boy, 15, had his torso crushed by his older brother's 11 1/2-foot pet Burmese python, and died from asphyxiation due to mechanical compression of the chest	Parents should always be held responsible. Death by a snake shouldn't be treated any differently than accidental death involving other activities. No risk to uninvolved public

CONCLUSION:

None of these deaths were the result of the constrictor (non – venomous) snakes being unsupervised off the private owners' property. Instead, all victims were voluntarily on the property where the animal was kept, be it owner(s) or family members.

Since 1990, there is no record of a member of the general public in the USA dying as a result of a constrictor snake. Captive keeping of large constrictors might be a slight voluntarily accepted hobby/occupational hazard, but it is NOT a public safety issue. We found no US human fatalities caused by captive boa constrictors in the recent history.