



CONGRESSIONAL BUDGET OFFICE
COST ESTIMATE

October 9, 2009

H.R. 2811

A bill to amend title 18, United States Code, to include constrictor snakes of the species Python genera as an injurious animal

*As ordered reported by the House Committee on the Judiciary
on July 29, 2009*

CBO estimates that implementing H.R. 2811 would have no significant cost to the federal government. Enacting the bill could affect direct spending and revenues, but CBO estimates that any such effects would not be significant.

H.R. 2811 would make it a federal crime to import or ship certain snakes into the United States. Because the bill would establish a new offense, the government would be able to pursue cases that it otherwise would not be able to prosecute. We expect that H.R. 2811 would apply to a relatively small number of offenders, so any increase in costs for law enforcement, court proceedings, or prison operations would not be significant. Any such costs would be subject to the availability of appropriated funds.

Because those prosecuted and convicted under H.R. 2811 could be subject to criminal fines, the federal government might collect additional fines if the legislation is enacted. Criminal fines are recorded as revenues, deposited in the Crime Victims Fund, and later spent. CBO expects that any additional revenues and direct spending would not be significant because of the small number of cases likely to be affected.

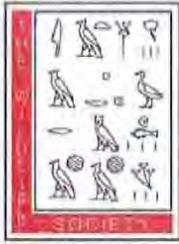
Under H.R. 2811, entities such as zoos would need permits to import or transport the affected species of snakes. Based on information provided by the U.S. Fish and Wildlife Service (USFWS), which issues permits for such activities, CBO estimates that enacting the bill could result in an increase in offsetting collections (for permits) and associated spending. We estimate that such increases would be minimal, however, and would offset each other in most years, resulting in no significant net cost.

By prohibiting the importation and interstate transport of certain snakes without a permit, the bill would impose intergovernmental and private-sector mandates as defined in the Unfunded Mandates Reform Act (UMRA).

The cost to public and private entities eligible for permits, such as zoos or research centers, would be the expense of obtaining those permits. (USFWS regulations prohibit the agency from charging permit fees to state, local, or tribal entities. Fees for private entities would be \$25 or \$100 depending on the activity being authorized.) The cost of the mandate to those ineligible for a permit, including private importers, breeders, retailers, shippers, and owners of those snakes, would be the forgone net income from no longer being able to sell or transport the animals across state lines. (According to the USFWS, exportation of the animals would be allowed only from coastal or border states.)

Based on information about the cost of permits from the USFWS, and information gathered from industry professionals about the value of shipments, sales, and imports of snakes, CBO estimates that the costs of the mandates would fall below the annual thresholds established in UMRA for intergovernmental and private-sector mandates (\$69 million and \$139 million in 2009, respectively, adjusted annually for inflation).

The CBO staff contacts for this estimate are Mark Grabowicz (for costs to the federal justice system), Deborah Reis (for USFWS), Melissa Merrell (for the impact on state, local, and tribal governments), and Marin Randall (for the impact on the private sector). The estimate was approved by Theresa Gullo, Deputy Assistant Director for Budget Analysis.



THE WILDLIFE SOCIETY

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The Wildlife Society (TWS) is writing to express our strong support and provide further information for the above-referenced U.S. Fish and Wildlife Service proposed rule to list the boa constrictor, four python species, and four anaconda species as injurious under the Lacey Act, 18 USC §42. TWS strongly urges prompt listing of these snakes as injurious to prevent their further import and spread throughout vulnerable habitats in the United States.

The Wildlife Society was founded in 1937 and is a non-profit scientific and educational association of over 9,100 professional wildlife biologists and managers, dedicated to excellence in wildlife stewardship through science and education. Our mission is to represent and serve wildlife professionals—the scientists, technicians, and practitioners actively working to study, manage, and conserve native and desired non-native wildlife and their habitats worldwide.

TWS is concerned about invasive species, and particularly about the rising costs of the effects of invasive plant and animal species, such as constrictor snakes, to society. These effects include negative impacts on biological diversity, productivity, environmental integrity, and wildlife and human health, as well as economic effects. Key to preventing further spread of these negative effects is to prevent the importation and interstate transportation of these invasive species; for example, annual imports for reptiles and amphibians alone in the U.S. are estimated at 6.4 million, in large part driven by the popularity and ubiquitousness of constrictor snakes in the exotic pet trade. While the pet industry, not unexpectedly, opposes this legislation, it should be noted that it is our nation's taxpayers, not the pet industry, that ends up paying for expensive control or eradication programs.

As detailed in a recent U.S. Geological Survey (USGS) report¹, such snakes pose a unique and rapidly growing threat to native wildlife due to their large body size, large clutch size, short time to maturation, and long life span. These constrictors are generalist predators capable of surviving on a wide range of prey species, and are capable of rebounding rapidly from population crashes. Because there is no North American snake species of comparable size, prey animals have not evolved defenses against this novel predator, and their populations could be easily and irreversibly damaged.

As requested in the above-referenced Federal Register notice, TWS would like to provide comments on the draft environmental assessment on pythons prepared by the USFWS, as well as provide data that will specifically address three of the questions posed in the notice.

Draft Environmental Assessment

As reported in the USGS risk assessment¹, five of these non-native snakes would pose high-risks to ecosystem health if established in the US, and all nine species have characteristics that associate them with greater risks, including the ability to potentially harm humans. Such risks come as a result of their large size, voracious appetite, potential to spread associated pathogens and other pests, and putative ability to expand into vulnerable regions of the southeastern US. The risk assessment and other published reports have shown that these risks are real and will experience continued expansion until transportation and importation of these species is halted.

As noted in the environmental assessment, wildlife managers have limited ability to control these invasive species once they become established. Indeed, control is expensive and likely impossible once a large population establishes itself. Prohibiting import and transport of these species will significantly reduce the chance of them spreading into greater ranges and will result in only positive impacts on native species. While there will be some economic impacts from the retail losses from decreased sales of these species, the costs of wildlife control and habitat restoration are sure to be significantly greater; for example, a 2006 GAO report³ estimated that the average cost for restoration of an endangered species is \$15.9 million. Additionally, our national parks, refuge system, and other natural resource agencies are already over-worked, under-staffed, under-funded, and do not have the resources to handle more management and environmental mitigation projects brought on by yet another invasive species.

Additionally, an impact not considered in the draft environmental assessment is the environmental impact of overharvesting these snakes from their native ranges. The USGS risk assessment notes that the U.S. is the primary source of market demand for these snakes, and for many of them, the imported trade is a documented threat that is causing serious population declines throughout native ranges. According to a 1997 Council on Environmental Quality document on NEPA guidance, “case law interpreting NEPA has reinforced the need to analyze impacts regardless of geographic boundaries within the United States, and has also assumed that NEPA requires analysis of major federal actions that take place entirely outside of the United States but could have environmental effects within the United States.”² Therefore, the worldwide effects of the importation of these snakes should also be taken under consideration as the USFWS completes the listing.

Because of their potential to cause great harm to native species, ecosystems, and humans, the cost of damage and control, their declining status in their home ranges, and the significant uncertainty associated with the full-extent of the risk posed by these species, TWS supports **Alternative 2 in the draft environmental assessment, to immediately list all nine species evaluated in the USGS risk assessment as injurious under the Lacey Act.**

Questions Posed in the Notice

(9) What State threatened or endangered species would be impacted by the introduction of any of the nine constrictor snake species?

To answer this question, we briefly highlight results published in several recent scientific papers and available through public search (referenced in appendix):

In Florida, the most recent dietary analyses have shown that one State endangered species, the Key Largo Woodrat (*Neotoma floridana smalli*), and three species of special concern, the American alligator (*Alligator mississippiensis*), the limpkin (*Aramus guarauna*) and the white ibis (*Endocemus albus*) have been found in the gut contents of python snakes captured in Florida.

While these are the only species that have been documented in the guts of these snakes to date, given the wide-ranging dietary habits of the Burmese python, it is possible that other state and federally endangered or threatened species in Florida may also be at risk as prey, especially as these snakes continue to expand throughout Florida. In addition to the Key Largo woodrat, protected species believed to potentially be at risk include the Florida panther (*Puma concolor coryi*), mangrove fox squirrel (*Sciurus niger avicennia*), Key Largo cotton mouse (*Peromyscus gossypinus allapaticola*), wood stork (*Mycteria Americana*), Cape Sable seaside sparrow (*Ammodramus maritimus mirabilis*), and American crocodile (*Crocodylus acutus*) (Snow *et al.*, 2007). Moreover, the overlap in diet suggests that the threatened indigo snake (*Drymarchon couperi*) may have an aggressive competitor for prey⁴. In addition to the species noted here, the USGS risk assessment¹ lists 118 endangered or threatened species, or species of special concern that could be impacted throughout the potential range of these invasive snake species.

(10) What species have been impacted, and how, by any of the nine constrictor snake species?

In addition to the species noted above, the scientific literature also reports that the following wildlife and domestic species have also been collected from the digestive tracts of Burmese pythons collected and examined in Florida: rabbit (*Sylvilagus sp.*), hispid cotton rat (*Sigmodon hispidus*), gray squirrel (*Sciurus carolinensis*), fox squirrel (*Sciurus niger*), domestic cat (*Felis catus*), raccoon (*Procyon lotor*), old world rats (*Rattus sp.*), Virginia opossum (*Didelphis virginiana*), bobcat (*Lynx rufus*), round-tailed muskrat (*Neofiber alleni*), rice rat (*Oryzomys palustris*), river otter (*Lutra canadensis*), white-tailed deer (*Odocoileus virginianus*), pied-billed grebe (*Podilymbus podiceps*), American coot (*Fulica americana*), house wren (*Troglodytes aedon*), rail (*Rallus spp.*), red-winged blackbird (*Agelaius phoeniceus*), blue-winged teal (*Agelaius phoeniceus*), anhinga (*Anhinga anhinga*), great egret (*Ardea alba*), heron (*Egret spp.*), magnificent frigatebird (*Fregata magnificens*), common moorhen (*Gallinula chloropus*), domestic chicken (*Gallus domesticus*), wood stork (*Mycteria americana*), whimbrel (*Numenius phaeopus*), purple gallinule (*Porphyrio martinica*), sora (*Porzana carolina*), eastern meadowlark (*Sturnella magna*), and domestic goose (*Anser sp.*)⁵. This list is in addition to dozens of partial samples from other unidentified species⁶. To date, there are few published studies of the gut contents of these invasive snake species, nor are the broader impacts of these invasive snakes on the larger populations of these prey species known. This gap in our knowledge suggests an area in which more research time and dollars could be devoted to augment our understanding of the effects of these invasive snakes on our environment and our native wildlife.

National Environmental Coalition on Invasive Species

Defenders of Wildlife, National Wildlife Federation
Natural Areas Association, Natural Resources Defense Council,
The Nature Conservancy, Union of Concerned Scientists

May 10, 2010

Public Comment Processing
U.S. Fish and Wildlife Service
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Attn: R1N 1018-AV68
Filed at: www.regulations.gov, docket no. FWS-R9-FHC-2008-0015

Re: Injurious Wildlife Species; Constrictor Snakes from Python, Boa, and Eunectes
Genera

Dear Sir/Madam:

Thank you for the opportunity to comment on the above-referenced proposed rule published in the Federal Register of March 12, 2010, vol. 75, pp. 11808-11829. The notice seeks information related to a proposal to list nine, large constrictor snakes as injurious wildlife under the Lacey Act, 18 USC §42, specifically: Indian python (*Python molurus*, including Burmese python *P. molurus bivittatus*), reticulated python (*Broghammerus reticulatus* or *P. reticulatus*), Northern African python (*P. sebae*), Southern African python (*P. natalensis*), boa constrictor (*Boa constrictor*), yellow anaconda (*Eunectes notaeus*), DeSchaunsee's anaconda (*E. deschauenseei*), green anaconda (*E. murinus*), and Beni anaconda (*E. beniensis*). This would stop importation and interstate movement of these animals under the U.S. Lacey Act except pursuant to special permits for approved uses.

The undersigned members of the **National Environmental Coalition on Invasive Species** (NECIS) strongly support prompt listing of each of these large constrictor snakes as injurious and their prohibition from further import and interstate commerce in the United States. Our organizations together represent millions of Americans concerned about the severe ecological disruption and other harms caused by non-native invasive species.

We reiterate the serious concern several NECIS members have expressed in the past regarding excessive delays in the Fish and Wildlife Service ("Service") procedures for listing injurious animals. We believe Congress cannot have intended that the Service would take so long to finalize listing proposals, as the delays often render the final rules ineffective. In the present case, the South Florida Water Management District (SFWMD) filed its petition that led to the current proposal on Sept. 21, 2006, yet it is almost four years later and the Service is only now issuing a proposed rule. (See detailed analysis in,

Fowler, A., D. Lodge, and J. Hsia. 2007. Failure of the Lacey Act to protect U.S. ecosystems against animal invasions. *Frontiers in Ecology and the Environment* 5:357-359, and Defenders of Wildlife. 2007. *Broken Screens - The Regulation of Live Animal Imports in the United States*.¹) We urge the Service to support both legislative and administrative measures to rapidly speed up its too-costly and ineffective listing approach.

Introductory Comments on the Proposal

The *Broken Screens* report provided “coarse” preliminary risk screening for most of the nine large constrictor snakes at issue here. (It also “screened” more than 2,200 other non-native animal species imported during the study period of 2000 to 2004). The *Broken Screens* data indicated that six of the nine species under consideration were actually imported during the study period, that is:

- *Boa constrictor*; *Eumectes murinus*; *E. notaeus*; *Python molurus*; *P. reticulatus*; and *P. sebae*

All but one (*P. sebae*) of these imported species were quickly identifiable as of 2007 as presenting invasion and/or safety risks in readily-accessible literature and reliable online data sources. The 2009 detailed USGS large constrictor snake study provides a “fine” risk screening, which authoritatively confirms all nine of the species are unsuited for future widespread private sale and use in the United States.²

Burmese pythons and other large constrictor snakes have continued to be allowed to be sold across the rest of the nation and additional releases of them to the wild could have easily occurred, facilitating further expansion of their occupied range. These continuing sales and resulting foreseeable continuing releases only serve to frustrate natural area management efforts by the dedicated, but under-resourced and overwhelmed, public agencies, such as the Everglades National Park and the SFWMD, whose missions compel them to attempt to control these disruptive and dangerous non-native animals. Yet, control work is almost a waste of effort when the targeted species can continue to be freely sold to the public throughout Florida and the rest of the nation.

Released large constrictor snakes are top predators that can kill and consume America’s native (and non-native) wildlife, as well as pets and domestic species, of all kinds including, but not limited to, bobcats, deer, alligators, raccoons, rabbits, muskrats, possum, woodrats, mice, ducks, egrets, herons and songbirds. The Burmese python invasion is an ecological calamity in progress. It is directly undermining the multi-billion dollar, nationally-supported Everglades restoration project because the monitoring and

¹ Online at: www.defenders.org/programs_and_policy/international_conservation/u.s._imports_of_live_animals/broken_screens.php.

² Reed, R.N., and Rodda, G.H. 2009. *Giant constrictors: biological and management profiles and an establishment risk assessment for nine large species of pythons, anacondas, and the boa constrictor*. U.S. Geological Survey Open-File Report 2009-1202, 302 pp.

success of that project are tied to measures of native wildlife “indicator” populations, which are now being consumed and reduced by these human-introduced predators. Had the Service considered the risks of the Burmese python under its Lacey Act listing authority 20 years ago, the agency might have prevented this invasion. The time could not be riper than now for preventing the establishment of feral populations in Florida and elsewhere of the other eight species, as well as by the Burmese python in areas where it has not already invaded.

The USGS large constrictor snake report has been imprudently attacked by a group of scientists working with the U.S. Association of Reptile Keepers (USARK). They purported to undercut its reliability, suggesting it lacked peer review and had other defects via a letter circulated to members of Congress. That “USARK letter” was discredited by a larger group of 16 qualified scientists who wrote their own letter dated Jan. 10, 2010, to Congress in support of the USGS report. A copy of that letter is attached hereto and incorporated by reference. The essence of their opinion:

We are writing in support of the report recently released by the U.S. Geological Survey (USGS), Giant Constrictors: Biological and Management Profiles and an Establishment Risk Assessment for Nine Large Species of Pythons, Anacondas, and the Boa Constrictor. The undersigned scientists believe that this report is based on peer-reviewed and transparent science and the risk assessment model used in the report is reasonable and appropriate, notwithstanding claims made in a recent letter submitted to this subcommittee by the U.S. Association of Reptile Keepers (USARK) challenging the validity of the USGS report....

This particular report was reviewed by 20 experts associated with U.S. and international universities, agencies, and organizations. In fact, 18 of the 20 reviewers who scrutinized this study were from institutions or agencies outside the USGS, contrary to USARK’s allegations that the report is not externally peer-reviewed....

While we understand the value of scrutinizing research models, results, and conclusions, we believe USARK’s unsubstantiated allegations are unprofessional and undermine important efforts being made by the scientific community.

In short, the USGS study gives an adequate and very reliable basis for the Service to decide whether or not to regulate these nine species.

Initial Statutory Decision-making Criterion for the Proposed Rule: the Lacey Act’s Injurious Species Standard

The Service’s notice poses several questions to the public on economics aspects of ongoing commercial sales of several of the snakes under consideration.³ The presence of these questions in the Federal Register suggests there might be ways to balance costs

³ Proposed Rule, at p. 11811.

of the regulation against its benefits and to modify the regulation to lessen potential impacts on small business entities. However, none of this information is relevant to the statutory standard the Service must apply in making the fundamental decision on whether it should list these species.

The statutory issue is not the benefits versus the costs of a possible Lacey Act listing. It is whether these snakes match the criteria of an “injurious species” in 42 USC sec. 18(a), i.e., whether the species are:

injurious to human beings, to the interests of agriculture, horticulture, forestry, or to wildlife or the wildlife resources of the United States.

It is abundantly clear these large constrictor snakes meet that definition. The USGS report thoroughly assesses the question of “injuriousness” in the statutory standard. The current and potential danger these snakes pose “to human beings or to wildlife or the wildlife resources of the United States” is beyond reasonable doubt, given the highly foreseeable likelihood that if further unregulated imports and interstate commerce occur, these large snakes will continue to be released by irresponsible pet owners and will continue to be able to establish harmful breeding populations throughout significant areas in the southern portion of the nation.

Additional Statutory Decision-making Criterion for the Proposed Rule: The Services’ Affirmative Endangered Species Act Duty

Note: The following discussion also responds to question (10) in the Federal Register notice:

(10) What species have been impacted, and how, by any of the nine constrictor snake species?

We will not reiterate all of the USGS risk assessment findings here, but one set of its findings stands out as determinative on the issue of “injuriousness”. Those are the clear findings about the threats each of these snakes pose to threatened and endangered species listed under the Endangered Species Act (ESA), which the Service also administers on behalf of the nation.

The USGS study addresses this threat unequivocally:

...the greatest environmental impact of invasion by giant constrictors would be predation on endangered species, either via further endangerment or outright extinction. Table 4.2 tabulates the large number of imperiled wildlife that presently occur in Florida and would be put at

greater risk by the establishment in that state of any of the giant constrictors.⁴

Table 4.2 in the USGS report reveals a total of **30 Federally-listed threatened or endangered species at risk from “*P. molurus* or other giant constrictors in Florida”**. (The table also lists dozens of additional State-listed and non-Federal “vulnerable” species at risk.) The report further elaborates:

*The species most immediately in danger of extinction by the introduced *P. molurus* include the Key Largo Woodrat (*Neotoma floridana smalli*), whose global range is restricted to northern Key Largo in the Upper Florida Keys; the Key Largo Cotton Mouse (FNAI refers to this as *Peromyscus gossypinus* pop 1), similarly restricted in distribution; the Cape Sable Seaside Sparrow (*Ammodramus maritimus mirabilis*), whose global range is within Everglades National Park; and the Round-tailed Muskrat (*Neofiber alleni*), whose global distribution is limited to Florida and parts of southern Georgia. The seaside sparrow nests in low shrubs highly accessible to pythons. The muskrat has habits and habitats that put it maximally in harm’s way, and though its resting platforms are conspicuous where present, the platforms have already become noticeably rarer in the areas occupied by the python (S. Snow pers. commun., 2008).*

*Should the python spread further into the Keys (presently it is known in Key Largo but does not clearly have a population established there), it would put several additional endemic populations or species at risk: Key Deer (*Odocoileus virginianus clavium*), Lower Keys Rabbit (*Sylvilagus palustris hefneri*), Lower Keys Cotton Rat (*Sigmodon hispidus exsputus*), Key Rice Rat (*Oryzomys palustris* pop 3), and Key Vaca Raccoon (*Procyon lotor auspicatus*). Should the python spread northward to Georgia, it would increase the risk on virtually all of the taxa listed in Table 4.2. Based on the experience of introduced prey sustaining artificially elevated introduced predator populations at the expense of native prey species (see references in Fritts and Rodda, 1998), the greatest biological impact of an introduced predator such as *P. molurus* is likely to be loss of imperiled native prey species. Species that are not presently listed as imperiled may become so or be extirpated. Species presently listed as at risk are in the greatest danger.⁵*

Jeopardy to Federally-listed species is not just a “prediction”. It is a fact, confirmed by southern Florida control officials who have discovered remains of the Key Largo woodrat in the stomachs of at least four trapped Burmese pythons. They also found remains of the endangered wood stork.⁶

⁴ USGS study at pp. 255-57.

⁵ USGS study at pp. 69-72; see associated discussion at pp. 68-73.

⁶ Testimony of Bert Frost, National Park Service, and Frank Mazzotti, University of Florida, to Subcommittees on National Parks, Forests and Public Lands and on Insular Affairs, Oceans and Wildlife of

These stomach samples of course don't show the full extent of the damage as they came from relatively few dead pythons among thousands in the wild. It appears highly likely that hundreds or even thousands of endangered animals have been taken by the entire python population and thousands more may continue to be in the future. In short, large constrictor snakes are placing ESA-listed animals in continuing jeopardy of extinction and are impacting dozens of other native species as well. Preventing the clearly foreseeable expansion of this tragic phenomenon must be the Service's highest priority.

The Service is bound by Section 7(a)(1) of the ESA, which directs the Secretary to:

*..review other programs administered by him and utilize such programs in furtherance of the purposes of [the ESA].*⁷

Here, the relevant program of course is the Secretary's regulation of injurious species under the Lacey Act. The "purposes of the ESA" that Sec. 7(a)(1) directs the Service to "further" when administering the Lacey Act are to "provide a means whereby the ecosystems upon which endangered species and threatened species depend may be conserved, to provide a program for the conservation of such endangered species."⁸

This "affirmative duty" to conserve "endangered species and threatened species," such as the Key Largo woodrat, wood stork and other native animals known to be jeopardized by non-native constrictor snakes mandates that the Service promptly regulate those species to the full extent of its Lacey Act authority. Reducing further imports and commercialization of these snakes will reduce the numbers of their clandestine releases into the wild. It eventually will serve to reduce their overall numbers and occupied U.S. range and reduce the potential jeopardy they pose to listed native species. Continued delay equates to continued ESA jeopardy.

The Role of State Regulations

Note: The following discussion also responds to question (1) in the Federal Register notice:

(1) What regulations does your State have pertaining to the use, transport, or production of any of the nine constrictor snakes? What

the House Natural Resources Committee, at March 23, 2010, joint oversight hearing on *How to Constrict Snakes and Other Invasive Species*. Online at

http://resourcescommittee.house.gov/images/Documents/20100323/testimony_frost.pdf and http://resourcescommittee.house.gov/images/Documents/20100323/testimony_mazzotti.pdf.

⁷ 16 U.S.C. § 1536(a)(1).

⁸ 16 U.S.C. § 1531(b); see, *Sierra Club v. Glickman*, 156 F.3d 606, 616 (5th Cir. 1998), which concluded Congress "intended to impose an affirmative duty on each federal agency to conserve each of the species listed [under the ESA]".

2004, or less than 1% of the total imported reptiles. (Recall that three of the nine species at issue here were not even imported during that time period, i.e., *E. beniensis*, *E. deschauenseei* and *P. natalensis*.) Those relatively few reptile breeders and marketers affected by this rule likely will be able to substitute some of the more than 700 other previously-imported species that will remain unregulated in place of the six newly-regulated species without suffering measurable economic damage. Indeed, they have had four years of notice that this regulation was likely coming, more than enough time to adjust their breeding operations accordingly. Notwithstanding the above, the Service states the DEA does not account for this “*substitution effect and, thus, may overstate impacts*”. (p. 29, last par.)

The Service should consider another important set of unconsidered impacts: overharvesting of the nine species in their native ranges. The analytical documents contain no consideration of environmental impacts in the native range countries for the nine snake species of the reduced harvesting pressure on these species from the three “action alternatives” as compared to the “No Action Alternative”. Under long-standing official Council on Environmental Quality (CEQ) NEPA guidance, when an action occurring in the United States directly leads to environmental impacts outside U.S. borders, those impacts must be considered by the action agency.¹¹

The EA fails to mention the overharvesting impacts resulting from the huge U.S. market demand for the imported snake species. The USGS and other reports confirm that the United States is the leading source of market demand, thus a Lacey Act prohibition of imports could dramatically ease the conservation risk for these species. For some of them it is documented that the import trade is a threat.

For example, a very recent report by the wildlife experts in TRAFFIC examines reptiles exported to the EU that are declared as “captive-bred” in comparison to the numbers of reptiles that breeding facilities in Indonesia are actually producing, or have the capacity to produce.¹² With respect to *P. molurus bivittatus* exports, TRAFFIC states (p. 15):

It therefore appears that the number of actual breeding records of this subspecies are reported inaccurately and therefore do not realistically reflect the current breeding status.

While the Burmese python was not the worst Indonesian species among those TRAFFIC assessed, the report notes (p. 1):

¹¹ Council on Environmental Quality, Guidance on NEPA Analyses for Transboundary Impacts, dated July 1, 1997. Online at: <http://ceq.hss.doe.gov/nepa/regs/transguide.html>.

¹² Nijman, V. and Shepherd, C. R. (2009). *Wildlife trade from ASEAN to the EU: Issues with the trade in captive-bred reptiles from Indonesia*. TRAFFIC Europe Report for the European Commission, Brussels, Belgium. 22pp. ISBN 9789833393299, online at: www.traffic.org/species-reports/traffic_species_reptiles26.pdf.

Illegal and unsustainable trade in wild-caught reptiles is a leading threat to the conservation of many species.

The Service should at least qualitatively consider the issue of whether the massive U.S. demand for imports of these snakes contributes to potentially unsustainable harvests. The proposed rule's potential impact of not driving these species toward extinction in their native ranges is an important environmental and economic benefit the Service must not overlook.

The Service should consider benefits it omitted: prevention of foreseeable human mortalities. Human mortalities attributable to the nine snake species cannot be reliably predicted, but they are reasonably foreseeable based on historical patterns. The Service's Draft Economic Analysis fails to consider these low-probability, but obviously high-impact, tragedies and costs. Human deaths certainly must be considered as being at least as important – indeed, as far more important – than speculative lost sales by small business entities.

According to news articles, 13 people were killed by pet pythons in twelve states between 1980 and 2009.¹³ There is controversy, however, whether one of these deaths was attributable to the snake, as reported. On the other hand, officials from one Pennsylvania coroner's office asserted:

*...despite the paucity of published reports of fatal constrictions of minors by pythons, we believe that such fatalities occur more frequently than are reported in the forensic literature.*¹⁴

Data from the U.S. Centers for Disease Control and Prevention (CDC) appear to support this. Since 1999, CDC has tracked "bitten or crushed by other reptiles" as a cause of death in the United States, a category which excludes alligators and crocodiles.¹⁵ According to CDC, there were 77 such deaths, in 20 states, between 1999 and 2006. This contrasts with 52 deaths due to "contact with venomous snakes and lizards" during the same time period. The database does not detail the reptile species involved, nor is there access to death certificates for verification. It would appear, though, that the number of constrictor deaths may be higher than reported in the press.

¹³ Humane Society of the United States, 2010. Published data gathered from news media. Personal communication from Beth Preiss, Regulatory Affairs, Washington, DC, April 28, 2010.

¹⁴ Omalu, B.L., J.T. Dominick, T.G. Uhrich, and C.H. Wecht. 2003. Fatal constriction of an 8-year-old child by her parents' pet python: a call for amendment to existing laws on the ownership of exotic wildlife to protect children from avoidable injury and death. *Child Abuse & Neglect* 27:989-991.

¹⁵ Centers for Disease Control and Prevention, National Center for Health Statistics. Compressed Mortality File 1999-2006. CDC WONDER On-line Database. Accessed at <http://wonder.cdc.gov/cmP-ied10.html> on April 28, 2010.

In 2003, the Office of Management and Budget instructed federal regulatory agencies to document the economic value of any policies that reduced risks to human life.¹⁶ OMB recognized that methods would continue to evolve, but recognized a concept known as the Value of Statistical Life, or VSL. Currently, a “reasonable average” for the VSL is \$5.5 to \$7.5 million.¹⁷ By any measure, the proposed rule will in the long run reduce the risks these snakes pose to humans, thus providing a substantial economic benefit, while preventing tragedies that cannot be economically measured.

Summary of comments on the economic analyses: In summary, in view of its failure to quantify several classes of potential benefits of the rule and its admission that the DEA oversimplifies the issues and likely overstates the costs of the proposal, the Service needs to more markedly qualify the quantitative values it does present. Merely putting a “high” and “low” range on the suggested economic impacts based on unsupported assumptions about unknown parameters does not constitute reliable analysis.

The “costs” dollar figures naturally will be seized on by decisionmakers who read the DEA because they appear to be quantitative and “factual”. But, that is a “false economy”; it is an artifact of the admitted low level of research and analysis the Service undertook. **The most vital point, though, is that the Service should not go back and spend more time doing this non-essential economics research; it should instead ensure that any decisionmakers who may consider the DEA analysis recognize its analytical limitations and the required qualifications for its estimates.**

The Service should disregard exaggerated claims of costs. We ask the Service to look with significant skepticism on purported facts submitted by self-interested snake importers and breeders, and perhaps by others, on the so-called economic importance of the constrictor snake “industry”. In testimony to Congress and media statements, USARK has made unsupported and frankly outlandish claims about the value of this activity and the numbers businesses and employees involved. Past claims of “billions of dollars” in losses are not credible. Mere repetition does not make claims into facts. The Service cannot accept such values unless it does independent research on whether any support exists for them.

Conclusion

As top predators that will kill native threatened and endangered species, and can kill people, the nine large constrictor snakes under consideration are clearly “injurious to human beings [and]... to wildlife or the wildlife resources of the United States” under the Lacey Act definition, above. Additional delays in their Federal regulation will compound the jeopardy these snakes pose now to ESA-listed species. Their Lacey Act listing cannot be denied or delayed consistent with Sec. 7(a)(1) of the ESA while the

¹⁶ Office of Management and Budget. 2003. Circular A-4. Regulatory Analysis. Washington, DC. Online at: <http://www.whitehouse.gov/OMB/Circulars/a004/a-4.pdf>. Accessed April 29, 2010.

¹⁷ Knesner, T.J., W.K. Viscusi, C. Woock, and Zilak, J.P. 2007. Pinning down the value of statistical life. IZA Discussion Paper No. 3107. Abstract available online at <http://ssrn.com/abstract=1029912>.

Service seeks economic information related to the volume of snake sales and potentially-impacted businesses, on which the agency's notice focuses. None of this information is relevant to whether the "injurious" standard is met under the Lacey Act nor could such information outweigh the **affirmative ESA duty** the Service has to conserve threatened and endangered species.

This nation needs to learn from past mistake of failing to timely prohibit importation of Burmese pythons and other species that have already invaded, to reflect on the disastrous situation that has led to, and to issue a final injurious species listing rule for all nine species at issue before additional invasions occur. We urge the Service to expedite its rulemaking accordingly.

If you have any questions on this comment, please contact me at 202-772-0293 or email: pjenkins@defenders.org.

Sincerely,



Peter T. Jenkins
Director of International Conservation
Defenders of Wildlife
1130 17th St. NW
Washington, DC 20036

On behalf of the undersigned:

Gabriela Chavarria, Ph.D., Director, Science Center
Natural Resources Defense Council

Ruark L. Cleary, Board of Directors
Natural Areas Association

Kristina Serbesoff-King, Invasive Species Program Manager, Florida
The Nature Conservancy

Corry Westbrook, Legislative Director
National Wildlife Federation

Phyllis N. Windle, Ph.D., Senior Scientist and Director, Invasive Species
Union of Concerned Scientists

Attachment

are relevant Federal, State, or local rules that may duplicate, overlap, or conflict with the proposed rule?

The notion that this is a “Florida problem” that the Service can leave to that state – or to any other state - to regulate is unsupportable. The State of Florida (and all other states, except perhaps insular Hawaii) lacks the capacity to inspect and regulate imports and it has no authority to limit interstate commerce the way the Federal government can. Thus, the states are powerless to keep those snakes from entering any given state so long as they can be legally imported into and sold throughout the other states. Nor does any one state have the responsibility to act in the interest of the other 49 states. That is a distinctly Federal role.

Even if these species were not able to survive outside Florida (which the USGS report refutes), the threat they pose to Everglades National Park, Big Cypress National Preserve, Loxahatchee National Wildlife Refuge, numerous refuges in the Keys, and a vast number of other highly significant nature preserves of national – indeed, international – significance would alone merit Federal regulation of these species.

Comments Related to Economic Issues in the NEPA Environmental Assessment, the Regulatory Flexibility Analysis and the Draft Economic Economic Analysis

The following discussion also responds to questions (2) through (5), (11) and (12) of the Federal Register notice:

Questions: (2) How many of the nine constrictor snakes species are currently in production for wholesale or retail sale, and in how many and which States?

(3) How many businesses sell one or more of the nine constrictor snake species?

(4) How many businesses breed one or more of the nine constrictor snake species?

(5) What are the annual sales for each of the nine constrictor snake species?....

(11) What provisions in the proposed rule should the Service consider with regard to: (a) The impact of the provision(s) (including any benefits and costs), if any, and (b) what alternatives, if any, the Service should consider, as well as the costs and benefits of those alternatives, paying specific attention to the effect of the rule on small entities?

(12) How could the proposed rule be modified to reduce any costs or burdens for small entities consistent with the Service's requirements?

In general, the NEPA Environmental Assessment (EA), the Regulatory Flexibility Analysis and the Draft Economic Analysis (DEA) fail to adequately describe the level of market and non-market economic damage that would result from the “No Action Alternative”. While information on the costs to businesses of speculative “lost sales” from the three “action alternatives” is more amenable to quantification, the Service’s analytical documents inadequately characterize the potential nationwide economic damage that would directly result from the foreseeable invasions of these species likely to be caused by their continuing unregulated importation and nationwide interstate sales. Likewise, the analysis fails to adequately quantify the potential benefits in the United States and elsewhere of the “action alternatives”. The Service admits this failure when it indicates “*a quantitative comparison of benefits and costs is not possible*” (DEA, p.1, 3rd par.).

The Service also admits its simplified analytical framework leads to overestimates of the costs to industry of its proposal. The reasons for this overestimation are actually two-fold:

First, is the failure to consider in-state sales markets for breeders.

The proposed rule would not ban in-state ownership of these species, only imports and interstate commerce. Breeders who desire to sell these species within a given state could continue to do so regardless of the proposed listing. The captive breeding industry – which is diverse and adaptable – could continue to supply the same market it supplies currently in each state where there is adequate demand to support a breeder. Yet, the DEA admits on p. 12 (last par. and in foot note 4.)

... we do not know where these breeders or wholesalers are located nor do we know where the snakes are shipped after purchase...

... information is not currently available on the extent of interstate or within state trade.

Without this missing information, the DEA cannot be relied on to reliably estimate an overall long-term economic effect on this industry. After potentially-affected breeders adapt their operations to just selling in-state where there is market demand, the net effect on the industry as a whole in terms of lost constrictor snake sales may be close to negligible.

Second, is the failure to consider the substitution effect. The *Broken Screens* report documented that from 2000-2004, at least 710 different fully-identified species of reptiles were imported.⁹ At a minimum, 47 additional reptile species were imported during that period without full species identification.¹⁰ In sum, at least 757 reptile species were in trade. With this proposed rule, USARK and like-minded reptile importers and breeders face **losing only up to six species** that were in trade during 2000-

⁹ *Broken Screens* report at p. 8, Table 1; and Appendix B.

¹⁰ *Broken Screens* report at p. 10, Table 3.

- *Python*, Pythons
 - *Python anchietae*, Angolan python
 - *Python breitensteini*, Borneo short-tailed python
 - *Python brongersmai*, Red blood python
 - *Python curtus*, Sumatran short-tailed python
 - *Python molurus*, Indian python
 - *Python molurus bivittatus*, Burmese python
 - *Python molurus molurus*, Indian python
 - *Python regius*, Royal python
 - *Python reticulatus*, Reticulated python
 - *Python sebae*, African rock python
 - *Python sebae natalensis*, Natal rock python
 - *Python sebae sebae*, African rock python
 - *Python timoriensis*, Timor python



**THE HUMANE SOCIETY
OF THE UNITED STATES**

May 11, 2010

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Re: Docket No. FWS-R9-FHC-2008-0015; 75 Fed. Reg. 11808-11829
(March 12, 2010)

To Whom It May Concern:

On behalf of The Humane Society of the United States (HSUS), the nation's largest animal protection organization with more than 11 million supporters, we strongly support the proposed regulations to list nine species of large constrictor snakes as "injurious,"¹ which will prohibit importation and interstate movement of the animals as pets. The HSUS submitted a letter in support of the 2006 petition by the South Florida Water Management District to list Burmese pythons as injurious, and we filed a comment in response to the U.S. Fish and Wildlife Service's notice of inquiry regarding pythons, boa constrictors, and anacondas in 2008.

During the years this process has taken, it is possible that Northern African pythons became established in parts of Florida. According to the South Florida Water Management District, regional biologists have now confirmed an established population of Northern African pythons less than five miles from the Florida Everglades.

Scientific evidence clearly demonstrates that nonnative large constrictor snakes have been released or have escaped into the environment, have become established in certain ecosystems, pose an unnecessary threat to threatened and endangered species, and can otherwise threaten the health and safety of humans, domesticated animals, and wildlife in the United States. The proposed regulations alone will not address the populations already breeding in the wild, but they will close a major introduction pathway and help stop the spread of these animals to new areas and the establishment of additional species. We urge that they be implemented without further delay.

¹ Under the Lacey Act (18 U.S.C. §§ 42-43), the Secretary of the Interior is authorized to list species as "injurious" if they are injurious to human beings, to the interests of agriculture, horticulture, forestry, or to wildlife or the wildlife resources of the United States.

Enacting these rules will not result in confiscation of people's pets. The regulations apply to interstate movement of the animals. They do not affect possession of the animals within a state. People would keep and maintain responsibility for their existing large constrictor snakes. In addition, while the interstate pet trade would be curtailed, the animals could continue to be imported and moved across state lines for zoological, educational, medical, or scientific purposes with a federal permit.

The nine species – Indian python (including Burmese python), reticulated python, Northern African python, Southern African python, boa constrictor, green anaconda, yellow anaconda, DeSchauensee's anaconda, and Beni anaconda – were identified based on a comprehensive October 2009 report by the U.S. Geological Survey (USGS) that found they all pose medium or high risk to the environment. None are low risk. If only some of these species are included, just a portion of the problem will be addressed. The trade would shift to other species, and risks to public safety, animal welfare, and the environment would remain.

Danger to People and Pets

The danger of keeping large constrictor snakes as pets was demonstrated tragically in July 2009 when a 2-year-old Florida girl was killed by an 8-foot Burmese python kept as a pet in her home. At least four people have been killed by pet pythons in the United States since 2006; seven people have been killed since 1999.

These grim statistics include adults with experience handling reptiles. A Virginia Beach woman was killed by her 13-foot reticulated python in October 2008. News reports say she may have been attempting to squirt medication into the snake's mouth. It reportedly took two men to drag the snake back to his enclosure. In 2006, an Indiana man told family members he was going to treat his 14-foot pet reticulated python for a medical condition. He was found dead in a shed by asphyxiation, with the python nearby. An Ohio man was strangled by his pet Burmese python in 2006. He was taken to a hospital, but it was too late to save him.

In addition to deaths, many people have been injured. According to news reports, in January 2009, a 3-year-old Nevada boy was constricted to the point of unconsciousness by an 18-foot reticulated python temporarily being kept in the family's home. As the boy began turning blue, his mother stabbed the snake with a kitchen knife to free the child. In 2008, a teenager woke from a nap with her father's Burmese python biting her and then coiling around her. Her father cut the snake's head off to free her and rushed her to the hospital.

First responders who face serious risks on a daily basis should not have to confront these deadly snakes. According to news reports, firefighters responding to a warehouse fire in Florida in 2007 found more than 100 snakes in the building, including 8-foot boa constrictors and pythons between 12- and 17-feet long. A firefighter found a large

Burmese python in the basement of a New York home after a fire was doused in 2007. A California firefighter found a 6-foot anaconda alive among the debris after a fire gutted a music studio in 2006.

Constrictor snakes on the loose also have attacked and killed family pets, such as a Siamese cat who was eaten by a Burmese python roaming a Florida neighborhood in 2005 and a small dog who died of injuries after being attacked by an escaped pet python in 2006.

Responding to incidents of large constrictor snakes on the loose uses resources needed for other emergencies and imposes financial costs on already-cash strapped communities. The Appendix to this comment provides details of attacks, escapes, and other incidents involving large constrictor snakes compiled from news reports. Many more incidents likely have occurred but gone unreported.

Environmental Threat

On October 13, 2009, the USGS released the comprehensive 300-page report, "Giant Constrictors: Biological and Management Profiles and an Establishment Risk Assessment for Nine Large Species of Pythons, Anacondas, and the Boa Constrictor," that is supporting material for the proposed rules. This peer-reviewed research quantified the ecological risk that nine species of large constrictor snakes pose to the United States, looking at both the probability that the snakes would become established and the resulting consequences.

The species studied and proposed for listing are the Indian python (*Python molurus*, including Burmese python *Python molurus bivittatus*), reticulated python (*Broghammerus reticulatus* or *Python reticulatus*), Northern African python (*Python sebae*), Southern African python (*Python natalensis*), boa constrictor (*Boa constrictor*), yellow anaconda (*Eunectes notaeus*), DeSchaunsee's anaconda (*Eunectes deschauenseei*), green anaconda (*Eunectes murinus*), and Beni anaconda (*Eunectes beniensis*).

The USGS concluded that overall risk was high for five of the giant constrictor snake species and medium for the other four species. Because all nine species share a large number of traits that promote invasiveness or impede population control, none of the species was found to be low risk.

For example, the species all have remarkable reproductive capacities and the ability to move large distances quickly. These traits make limiting their spread very difficult. The snakes also blend well into their surroundings, hindering efforts to find and remove them. Moreover, according to the USGS report, no current control tools seem adequate to eradicate an established population of giant snakes that has spread over a large area.

Removal efforts should occur when a population is limited to a local area less than a few acres, but USGS says the snakes are rarely detected until they have spread more widely.

Two of the species studied are confirmed to be already established and breeding in the United States – Burmese pythons and boa constrictors. From a relatively small number of animals released or escaped from the pet trade, Burmese pythons are now distributed across thousands of square miles of south Florida, probably numbering in the tens of thousands. The well-known photograph of a Burmese python who tried to swallow an alligator in the Florida Everglades illustrates the magnitude of the potential impact. As the Service noted about large constrictor snakes in proposing the new rules, “since they are a novel, top predator, they can threaten the stability of native ecosystems.”

Burmese pythons will eat a wide variety of reptiles, birds, and mammals of all sizes, and can deplete vulnerable species. According to the USGS report, “A very large number of imperiled species are at risk from giant constrictors in the State of Florida.” The report lists several species of special concern that have been eaten by Burmese pythons in Florida including the endangered Key Largo woodrat, round-tail muskrat, limpkin, and white ibis.

According to the USGS, large areas of the United States have a climate that appears suitable for survival of Burmese pythons, including most of California, Texas, Oklahoma, Arkansas, Louisiana, Mississippi, Alabama, Florida, Georgia, and South and North Carolina. With global warming, the potential range for these snakes is expected to move northward.

Boa constrictors also are already established in Florida, but over a much smaller area. With proactive measures to stop the influx of these snakes and remove existing animals, it may be possible to halt their spread. According to the USGS, “extant technology would not appear to be capable of eradicating any of the giant constrictors from south Florida unless the colonization were caught very early, perhaps around the present range of the Boa Constrictor population now in Miami (several hundred hectares or less).”

The USGS report sites evidence strongly suggesting that a third species, Northern African pythons, has established a reproducing population along the western edge of Miami. More recent information confirms that these snakes are now established in Florida. According to testimony presented on March 23, 2010 by Dan Thayer, Director of the Department of Vegetation and Land Management for the South Florida Water Management District, to the U.S. House of Representatives Subcommittee on National Parks, Forests, and Public Lands and Subcommittee on Insular Affairs, Oceans, and Wildlife, “In a recent, disturbing development, regional biologists have confirmed an established population of northern African pythons (*Python sebae*) on SFWMD and Miccosukee Indian lands less than 5 miles from the Florida Everglades.”

Individual animals of other species also have been found in the wild, raising concerns that they, too, could become established. The USGS notes that a green anaconda was found dead near Florida's Fakahatchee Strand Preserve State Park in 2004, and two adults and a juvenile were observed in the area. Yellow anacondas, a smaller species that can still grow to 10-feet long, have been found in or near Florida's Big Cypress National Preserve. A wildlife official reported seeing a yellow anaconda approximately 6-feet long in Arkansas's Wapanocca National Wildlife Refuge in 2005.

Southern Florida experienced a sustained cold spell in January 2010 that killed some nonnative large constrictor snakes. However, Burmese pythons and Northern African pythons continue to be found alive, showing they can survive colder temperatures. When asked in congressional testimony on March 23, 2010 whether snakes found dead following the cold spell meant they were not a threat further north, Dr. Herbert Frost, the National Park Service's Associate Director for Natural Resource Stewardship and Science, found "you can't draw the conclusion." The probability of the snakes moving north is a real thing, he said. He explained that one adult large female with a number of eggs who makes it through a cold snap can produce 50 to 80 new snakes.

Another characteristic that creates risk is the ability of the snakes to serve as hosts for parasites and disease. As the USGS report notes, snakes taken from the wild and imported often carry exotic parasites or pathogens that may transfer to other captive snakes during transport, sales, and pet ownership, or to native snakes or livestock if the animal escapes or is released. For example, snake ticks originating in Africa may carry heartwater, which is potentially devastating to cows, deer and other ruminants, and ticks from Asia can carry capillariasis, a disease of human health significance. Wild-caught anacondas imported to Europe are reported to be riddled with parasites, as noted by USGS.

Because of the potential danger large constrictor snakes pose to people and our ecosystems and the extreme cost and difficulty of removing these animals once they get established, preventing further invasions is critical. As Dr. Frost of the National Park Service said in his congressional testimony, "Unfortunately, there is no one quick fix that will comprehensively address the conservation challenges raised by the introduction of exotic invasive animal species; the reality is that we have limited tools for long-term management once these species are established. Consequently, preventing these species from being introduced is the most cost-effective strategy and the one that gives us the greatest likelihood of success."²

² Testimony of Herbert C. Frost, Associate Director, Natural Resource Stewardship and Science, National Park Service, before the House Natural Resources Committee, Subcommittee on National Parks, Forests, and Public Lands and Subcommittee on Insular Affairs, Oceans, and Wildlife, March 23, 2010, *available at* http://resourcescommittee.house.gov/images/Documents/20100323/testimony_frost.pdf

The scientific evidence shows that action is needed now to prevent the spread of Burmese pythons, boa constrictors, and Northern African pythons to new areas and to prevent the introduction of additional species.

Risk to Animal Welfare

Though they may be marketed as low-maintenance pets, it is difficult for the average pet owner to provide the sophisticated care needed to maintain large constrictor snakes in a healthy condition in captivity. Often purchased when they are small, constrictor snakes can grow very large very quickly, resulting in enclosures that are inadequate for their size and to prevent their escape.

The requirements reptiles have for light and temperature frequently are not met, and constrictor snakes may suffer from starvation, dehydration, and other symptoms of neglect when owners cannot provide proper care. Underfed snakes may pose particular risks to people. By one account, the snake who killed the Florida toddler was about half the appropriate weight. The USGS report notes that the snake who killed the Ohio man in 2006 also was underweight.

Constrictor snakes have been found kept in deplorable conditions by both dealers who move large numbers of the animals and by individuals keeping them as pets. As many as 27,000 animals including constrictor snakes were seized in December 2009 from a Texas-based company that bought and sold exotic animals. An undercover investigator who worked in the facility reportedly said he was responsible for the care of 1,500 to 3,000 snakes at any one time and there were days he found hundreds of snakes dead. A January 2010 judgment turned the animals over to the city. It noted that the animals were cruelly treated, and the facility did not have sufficient personnel to care for the animals adequately.

This case offered a glimpse at the appalling conditions at one facility. It may not be an isolated incident. "Evidence was received which indicated that this facility was operated in accordance with industry standards of the exotic animal trade. While this may be true, the Court is not free to substitute those standards for the standards set by Texas statutes," the judge said.³

In March 2010, Louisiana snake breeders were charged with animal cruelty after authorities reportedly found nearly 250 snakes living in poor conditions, including 22 snakes more than 12 feet long for which they did not have proper permits.

³ *In re: Approximately 27,000 Animals Seized on December 15, 2009*, No. 4909-D, *6 (Mun. Ct. Arlington, TX, Jan. 5, 2010), available at http://www.sPCA.org/site/DocServer/27000_Animals_Seized_12-15-09_Ruling.pdf

In March 2010, a cleaning crew found a dead constrictor snake at a foreclosed Florida home and called authorities, who found 75 to 100 dead snakes, including some dead for so long their carcasses had liquefied in their holding containers.

Officials investigating a report of an alligator in a Connecticut apartment in 2006 also found 36 snakes including boa constrictors, pythons, and an anaconda. The tenant had been evicted the previous day. The animals were left in extremely dirty and unhealthy conditions, with no food or water.

A Maryland man was charged with animal cruelty following an investigation of conditions at a reptile wholesale business in a warehouse in 2003. Boa constrictors were among the animals being housed in the facility; 199 animals were found dead.

A Pennsylvania man was charged with cruelty after admitting he turned loose his 10-foot Burmese python and 9-foot reticulated python in July 2009. When the snakes were found – one along a road and the other along a creek behind a home in the same area – they were severely malnourished. The person who took the snakes reportedly said it probably took years for them to deteriorate to that condition.

This sampling of incidents illustrates some of the risks the exotic pet trade poses to the welfare of these animals. In addition, once species are established, methods used to remove animals may be inhumane. Preventing the animals from becoming established in the first place is only failsafe humane approach.

If only some of the nine species are listed, the trade will shift to others and risks will remain. Similarly, hybrids of the nine species should be included to avoid loopholes because they also can pose risks.

Federal Regulations Are Needed to Complement State Laws

The Service requested information on state regulations pertaining to the use, transport, or production of any of the nine constrictor snakes, as well as relevant federal, state, or local rules that may duplicate, overlap, or conflict with the proposed rule.

State regulations complement rather than duplicate, overlap, or conflict with federal rules. Generally, states regulate possession and sales of animals within their borders while the federal government regulates imports and interstate transport. Oversight of the interstate trade has become especially important as the Internet enables anyone to find giant constrictors for sale, often across state lines.

The following states restrict the private possession of large constrictor snakes as pets; others may as well.

Florida: In May 2010, the Florida legislature unanimously passed a bill (S.B. 318/H.B. 709) to prohibit as pets the Burmese python, Northern African python, Southern African python, amethystine python, reticulated python, and green anaconda (species that were considered "reptiles of concern" in the state). Existing legally owned animals will be grandfathered for the life of the animal. In addition, state authorities have established an amnesty program for the surrender of illegally owned animals. The bill awaits the Governor's signature. Previously, the state had enacted a permit requirement for these species, but compliance was low or these snakes were rarely held. Only 387 people had been licensed to hold reptiles of concern as of December 2009. Even with this new law, state wildlife officials plan to continue to allow the breeding of these snakes for sale out of state, highlighting the need for federal action.

Hawaii: Prohibits all snakes as pets.

Illinois: Prohibits as pets "life-threatening reptiles," including any constricting snake six feet or over in length, such as boa, python, and anaconda.

Iowa: Prohibits as pets reticulated python, anaconda, African rock python.

Louisiana: Requires a permit for constrictor snakes in excess of 12 feet, including but not limited to: Papuan python, olive python, carpet or diamond python, scrub python, amethystine python, Southern African python, African rock python, Indian or Burmese python, reticulated python, boa constrictor, anaconda.

Massachusetts: Prohibits as pets African rock python, reticulated python, anaconda.

Montana: Prohibits as pets African rock python, amethystine python, green anaconda, Indian/Burmese python, reticulated python.

New Jersey: Prohibits anacondas as pets.

New York: Prohibits as pets Burmese python, reticulated python, African rock python, green anaconda, yellow anaconda, amethystine python, Indian/Burmese python.

Rhode Island: Requires a permit for African rock python, reticulated python, and all anacondas.

Texas: Requires a permit for African rock python, Asiatic rock python, green anaconda, reticulated python, Southern African python.

Current federal regulations on the import, sale, and interstate transport of large constrictor snakes are minimal unless the species is threatened or endangered (such as the subspecies for Indian pythons). Generally, commercial wildlife importers must be

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Page 9

licensed and commercial wildlife shipments must be imported through a designated port and declared.

Action Is Needed Now

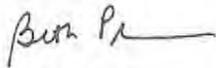
All one needs to do is a Google search for "anacondas for sale," "boa constrictors for sale," or "reticulated pythons for sale," and their ready availability for sale across state lines to untrained individuals is apparent.

An ounce of prevention is worth a pound of cure. Had Burmese pythons been listed as injurious 20 years ago, the colonization of the Everglades National Park could have been avoided, along with tremendous ecological and financial costs.

The Humane Society of the United States urges implementation of the proposed rules without further delay. We appreciate and celebrate snakes, but nonnative large constrictor snakes belong in their natural habitats and range countries around the globe, not in America's wilderness and communities, harming our natural resources and putting people at risk.

We applaud the leadership of Secretary Salazar and the staff of the Fish and Wildlife Service for advancing the proposed rules, and would be glad to provide any additional information you may need.

Sincerely,



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APPENDIX

Large Constrictor Snake Incidents Demonstrate Risks to Public Health and Safety, Animal Welfare, and the Environment

May 2010 (Florida): A woman found a 4-foot Burmese python under her car. Source: WESH.com

April 2010 (Oregon): An 8-foot boa constrictor was on the loose in Grants Pass after the owner's roommate mistakenly let the snake out. Source: *The Oregonian*

March 2010 (Louisiana): The owners of a snake breeding business with nearly 250 snakes were charged with animal cruelty when authorities found poor sanitary conditions. They also did not have the required state permits for 22 snakes exceeding 12 feet. Source: kplctv.com

March 2010 (Florida): A cleaning crew found a dead constrictor snake at a foreclosed home and notified authorities, who found 75 to 100 dead snakes, including some dead for so long their carcasses had liquefied in their holding containers. Source: wtlx.com

March 2010 (Washington, DC): A boa constrictor was found in an abandoned apartment. The owner had moved out, and a company hired to clean the apartment found the snake but accidentally turned off the heat lamp. The animal was without heat for about a day. Source: *Washington Post*

March 2010 (Florida): A man on a tractor in Rookery Bay National Estuarine Research Reserve spotted an 11-foot Burmese python. He was able to capture the snake with the help of two other men, but two smaller snakes escaped. Source: naplesnews.com

March 2010 (Florida): A man driving in Collier County saw a Burmese python longer than 9 feet in the road. He captured the snake and cut off his head with a small pocket knife. Source: WOAI.com

January 2010 (Florida): A 12-foot green anaconda was found in a drain pipe and captured by Osceola County deputy sheriffs. Source: *Orlando Sentinel*

January 2010 (Florida): An Orlando woman was surprised to find a 5-foot boa constrictor in the water heater closet of her apartment. Source: wftv.com

January 2010 (Florida): South Florida Water Management District personnel captured 25 Burmese pythons and five African rock pythons in South Florida in the first three weeks of January. Source: South Florida Water Management District

January 2010 (Hawaii): A homeowner was surprised to find a 6-foot boa constrictor in his garage. Source: hawaiinewsnow.com

December 2009 (Texas): Authorities removed as many as 27,000 animals including constrictor snakes from an exotic animal dealer in what was reportedly the largest animal cruelty seizure in U.S. history. Source: *Fort-Worth Star Telegram*

December 2009 (Arkansas): Pythons were among the reptiles two University of Arkansas students were keeping in their dorm room and selling on line. Source: 4029TV.com

December 2009 (Arizona): Yuma firefighters were called to remove an approximately 7-foot constrictor snake from the backyard of a residence. The animal was found to have escaped from a nearby home. Source: *Yuma Sun*

December 2009 (Florida): A woman arrived home to find her two dogs running around. She found an 8-foot boa constrictor coiled beneath a tree. Source: mysuncoast.com

December 2009 (Florida): A Tampa woman found a 12-foot Burmese python in her yard. When she called state officials for help, they suggested she use a shovel to chop the snake's head off. Instead a neighbor sought help at a fire station. A state spokesperson later said they should have assisted. Source: wltx.com

November 2009 (California): A 5-foot boa constrictor was found along the edge of a lagoon in Carlsbad. Source: *North County Times*

November 2009 (New York): A 5-foot boa constrictor was found on a Yonkers street. The snake was said to be lethargic but alive in the 42-degree weather. Source: WCBSTV.com (AP)

November 2009 (Florida): A dead 9-foot boa constrictor was found in a ditch next to a condominium in north Naples. The snake appeared to have been hit by a vehicle. Source: Florida Fish and Wildlife Conservation Commission Division of Law Enforcement Field Operations Weekly Report

November 2009 (Florida): A 7-foot python was found in a backyard in Broward County. Source: Florida Fish and Wildlife Conservation Commission Division of Law Enforcement Field Operations Weekly Report

November 2009 (Florida): A man was charged with animal cruelty after authorities found numerous dead snakes along with two live boa constrictors and one live python in his Citrus Park home. Source: cfnews13.com and Hillsborough County Animal Services

October 2009 (California): A 7-foot boa constrictor on the loose went under a car and was found wrapped around the car's engine compartment. The snake was reportedly

one of three snakes someone left in a box on a corner in Compton. Another one was taken by a neighbor, and the third one was dead. Source: Fox 43

October 2009 (Massachusetts): A 5-foot boa constrictor was caught in a makeshift trap in the attic of a six-family dwelling in Fall River. It was unclear where the snake came from. The snake was thought to be sick with an upper respiratory infection and about 10 pounds underweight. Source: *The Boston Globe*

October 2009 (North Carolina): Two brothers found an injured 7-foot boa constrictor in a driveway. Source: Star News Online

October 2009 (Florida): A mother and daughter found an 8- or 9-foot Burmese python in their residential neighborhood in Vero Beach. This was said to be the second nonnative snake caught in Vero Beach this year. Source: 12 News

October 2009 (Florida): Authorities found an 11-foot Burmese python crawling uncaged in a Crestview man's home. Source: Florida Fish and Wildlife Conservation Commission

October 2009 (Florida): Charges were filed against a Wewahitchka man after his 11-foot Burmese python escaped and was killed in a neighbor's chicken coop. The man had no cage for the snake, who crawled freely about the Wewahitchka apartment. Source: Florida Fish and Wildlife Conservation Commission

September 2009 (Florida): A 10-foot boa constrictor was on the loose in Hillsborough County. Wildlife officials say they are not going after the snake because so many people have dumped pet snakes, and they don't have the resources to go after them all. Source: Fox Tampa Bay

September 2009 (Florida): Authorities were alerted to an 18-foot Burmese python at an Apopka home. The snake reportedly weighed 400 pounds and was 30 inches around. Source: WBIR.com

September 2009 (Florida): Authorities removed two large Burmese pythons from a Lakeland home, an 11-foot male and a 17-foot female who weighed more than 150 pounds. Source: Florida Fish and Wildlife Conservation Commission

September 2009 (Florida): A 7-foot reticulated python was found near a state park. Source: *Sarasota Herald-Tribune*

September 2009 (Florida): An 8-foot python was found along a roadside in Placer County. Source: KTVU.com

September 2009 (New York): A 10-foot Burmese python was on the loose in Elmira Heights. This was the second time one of the owner's pythons escaped into the neighborhood. Source: WETMtv.com

September 2009 (Arkansas): An 11-foot Burmese python escaped from an enclosure in a garage, was found in a neighbor's yard, and was recaptured. Source: *The Morning News*

September 2009 (Florida): A dead 10-foot python was found in the water at the Largo Nature Preserve. Source: *Largo Leader*

August 2009 (California): A boa constrictor between 6- and 8-feet long was found on a road in Escondido. Source: *North County Times*

August 2009 (New York): A 4-foot boa constrictor was found in a Manhattan laundromat. Source: NY1

August 2009 (Florida): A 5-foot boa constrictor was found on a Daytona Beach road. Source: *News Journal Online*

August 2009 (California): An 11-foot Burmese python escaped from a Riverside County home and was found in a neighbor's yard. Source: *The Press Enterprise*

August 2009 (Missouri): A 9-foot Burmese python was spotted at a park and captured a few days later. Source: *St. Joe News*

August 2009 (Oregon): A 10-foot python was found on a road. Source: KVAL News

August 2009 (Utah): An 8-foot Burmese python was found outside a woman's home. Source: *Deseret News* (Associated Press)

July 2009 (Florida): A 2-year-old girl was killed by an 8-foot Burmese python who escaped from an enclosure in her home. Source: Florida Fish and Wildlife Conservation Commission

July 2009 (Florida): A 17-foot Burmese python was found on the grounds of a veterinary hospital. The snake was spotted by the 11-year-old nephew of the hospital owner. Source: *Miami Herald*

July 2009 (Indiana): A 5-foot-long red-tail boa constrictor escaped and was missing. Source: *The Republic*

July 2009 (Illinois): An 8-foot boa constrictor was caught after escaping and being on the loose for a few weeks. The snake was a few houses away. Source: *Connect Tristates*

July 2009 (Florida): A large boa constrictor was found hiding in the gutter of a vacant Pasco home. Source: FOX Tampa Bay

July 2009 (Florida): Two Burmese pythons, one 8 feet, one 9.5 feet, were captured after escaping from a home. Source: *The Ledger*

July 2009 (Florida): A 12-foot plus Burmese python was found loose around a neighborhood of town homes. Source: *Orlando Sentinel*

July 2009 (Pennsylvania): A 10-foot albino Burmese python and 9-foot reticulated python were found. Both snakes were malnourished. The owner reportedly admitted to releasing the snakes because he could no longer afford to care for them. Source: *Lebanon Daily News*

July 2009 (Maryland): A 3-foot Burmese python escaped from a home. Source: *The Gazette*

July 2009 (Arizona): A Yuma family found a 6-foot long python on their front porch. Source: *The Arizona Republic*

July 2009 (Rhode Island): An eight and a half foot Burmese python reported missing from a home in Portsmouth was later found in the home's basement. It was unclear how the snake got loose. Source: NBC 10 News

June 2009 (Wisconsin): Police gave a couple two weeks to remove 22 boa constrictors from their Janesville apartment. One was about 6 feet long, another about 4 feet long, and 20 were small (3 months old). Source: GazetteXtra.com

May 2009 (Florida): A Punta Gorda police officer removed an injured 4.5-foot python from an intersection. The snake suffered from a broken jaw and died soon afterward. Source: NBC2 News

May 2009 (Florida): An investigation into the escape of a 10-foot Burmese python in Pinellas Park determined the snake had escaped almost two months earlier. Source: Florida Fish and Wildlife Conservation Commission Division of Law Enforcement Field Operations Weekly Report

May 2009 (Maine): A 2-foot boa constrictor escaped from a cage in a high school. He hid in an old computer printer, and was not discovered until the school gave the printer to a student to take home and dismantle. Source: WHNT 19News (AP)

April 2009 (Wisconsin): Authorities removed a stash of exotic animals from a Milwaukee home, including a 14-foot reticulated python, a 5-foot boa constrictor, a 4-foot green anaconda, and a 3-foot rock python. Source: *Journal Sentinel*

February 2009 (Wisconsin): Two Burmese pythons were turned over to a shelter after the owners were arrested on drug-related charges. Source: *Beloit Daily News*

February 2009 (California): Police and animal control officers searched for a 23-foot reticulated python weighing approximately 120 pounds who escaped from a San Luis Obispo home. Source: www.ksby.com

January 2009 (Nevada): A 3-year-old boy was bitten and squeezed to the point of unconsciousness by an 18-foot python. His mother stabbed the snake with a kitchen knife and freed the child. The snake had been in the home for four to six weeks. Source: kvbc.com and *Las Vegas Review-Journal*

January 2009 (New York): A 7-foot reticulated python escaped from an enclosure, and authorities were called to capture and remove the snake. Source: *New York Daily News*

January 2009 (New York): A Burmese python was found in a field in Brooklyn. The cold weather had taken a toll on the animal who had lost an eye and developed an infection, causing some teeth to fall out. Source: *York Daily Record*

January 2009 (Washington): Firefighters rescued a boa constrictor, python, and other animals before flames engulfed a North Spokane home. Source: nwcm.com

December 2008 (Ohio): A man called animal control when his 6-foot boa constrictor became aggressive during a nighttime feeding. Authorities helped find the snake a new home. Source: WLWT

November 2008 (Florida): Investigators captured three Burmese pythons, ranging from 9 to 11 feet, within a 50-yard span of an area known as the 8.5 Square Mile in Miami-Dade County. Source: Florida Fish and Wildlife Conservation Commission, Division of Law Enforcement Field Operations Weekly Report.

November 2008 (Florida): A woman nearly tripped over a 10-foot boa constrictor in Punta Gorda. Source: nbc-2.com

October 2008 (Virginia): A woman was found dead by asphyxiation, and her 13-foot pet reticulated python, who she was apparently medicating, was found outside his enclosure. Source: *The Virginian-Pilot*

October 2008 (Colorado): A woman was attacked by her 6-foot albino Burmese python. The animal was sprayed with a fire extinguisher to get him to let go of her finger and

then according to the woman it took five paramedics to hold the snake down. Source: KRDO.com

October 2008 (Florida): A 12-foot 100-pound Burmese python was found crossing a road in Jupiter Farms. The snake appeared to be injured and may have been hit by a car. Source: South Florida Sun-Sentinel.com

September 2008 (Oklahoma): A woman found a 4-foot boa constrictor in her motor home. Source: *The McAlester News-Capital*

September 2008 (Florida): A Myakka City homeowner found a 10-foot albino Burmese python in her driveway. Source: *Sarasota Herald-Tribune*

August 2008 (Nevada): A 13-year-old girl visiting her father was attacked by a pet Burmese python; her father killed the approximately 15-foot snake to rescue her. The snake reportedly escaped from a large tank with locks. The same day, a student zookeeper in Venezuela was crushed to death by a Burmese python. Source: KVBC

August 2008 (Michigan): A state trooper shot and killed a nearly 7-foot long snake, believed to be a Burmese python, seen on a Port Sheldon Township road. Source: *The Grand Rapids Press*

July 2008 (Maine): A man discovered an 8- to 9-foot reticulated python under the engine compartment of his pickup truck in Wilton. It was the second such incident in Maine in less than a week. A Gorham woman found a reticulated python in a washing machine on Wednesday. The snake had injuries on its upper jaw from being dragged. Source: *Sun Journal*

June 2008 (Florida): A woman found a 7-foot Burmese python in her Key Largo yard. She and a friend killed the snake. Source: *The Reporter*

June 2008 (Illinois): A woman found a 4-foot albino Burmese python in a Starbucks parking lot in Rockford. Source: rrstar.com

June 2008 (New York): A 14-foot 80-pound Burmese python was found after more than two days on the loose in the Jordan-Elbridge area. The animal had been at a reptile rescue center and the owner believed someone cut the bungee cords on his cage, letting him get out. Source: news10now.com

May 2008 (North Carolina): A 4-foot python was found loose in a restaurant. Source: WECT TV6

May 2008 (Florida): Firefighters battling fires in the Everglades encountered pythons, boa constrictors, and other exotic animals. Source: National Geographic News

April 2008 (Oregon): A pet store owner reached into a cage to show a customer a 12-foot Burmese python when the snake bit her hand and coiled around her arm, throwing her to the floor. It took several emergency responders to unwrap the snake. Source: MSNBC (Associated Press)

April 2008 (Florida): Deputy Secretary of the U.S. Department of the Interior Lynn Scarlett found an 8- to 9-foot Burmese python while hiking in the Everglades. Source: People, Land & Water, U.S. Department of the Interior

April 2008 (Connecticut): A 6-foot python escaped from a home and was found two days later curled up in the yard. Source: *The News-Times*

April 2008 (Florida): A Burmese python about 8-feet long was found in the rafters of a Marco Island Executive Airport hangar. Source: *Naples Daily News*

April 2008 (Illinois): A red-tail boa was among the animals who escaped when a car crashed into a home and broke open their tanks. Most of the animals were recaptured. Source: *Belleville News-Democrat*

March 2008 (Kentucky): Authorities seized a boa constrictor and python, along with venomous snakes and other reptiles, from a man's home. At the time of the seizure, the owner of the animals was in the hospital having two fingers amputated because of a snake bite. Source: LEX 18 News

March 2008 (California): A woman pleaded guilty to animal cruelty. A nearly 15-foot Burmese python was one of more than 200 animals found in her home, many of them malnourished and in need of veterinary care. Source: *The Sacramento Bee*

February 2008 (Florida): A 4-foot python was found beneath a water heater in a newly rented home. Source: *Sarasota Herald-Tribune*

February 2008 (Florida): A 13-foot python was seen in a Wal-Mart parking lot. A rescue worker found the animal in a culvert more than two weeks later. Source: *Sarasota Herald-Tribune*

February 2008 (Florida): A woman was arrested for animal cruelty after authorities found a Burmese python and other animals living in deplorable conditions in her home. The snake was kept in a small dog crate that was full of feces and shedded snake skins. Source: *St. Petersburg Times*

January 2008 (Montana): A man was driving with a 5-foot long Burmese python when the animal crawled out of a pillow case and into the van's duct system. Auto mechanics retrieved the snake. Source: *Great Falls Tribune*

December 2007 (Ohio): A 7-foot African rock python was found in the Metzger Marsh State Wildlife Area. The animal was alive though it was 37 degrees and sleeting. Source: *The Toledo Blade*

December 2007 (Florida): A man mowing the lawn for the county ran over and killed a 16-foot python. An animal control officer said the snake was among the largest of the 20 large pythons or boas he has found in the past decade in Indian River County, comparable in size to one found two years before. Source: tcpalm.com

October 2007 (Florida): A Summerland Key resident was cited for allowing the escape of captive wildlife and inadequate cage size for a reptile. The incident began after citizens saw a 14-foot python in the bushes along a public parking lot. The owners of the snake – who used the animal for photos with tourists – said the snake had escaped two days before. Source: Florida Fish and Wildlife Conservation Commission Field Operations Weekly Report

September 2007 (Florida): His barking dog alerted a man to the presence of an 11-foot Colombian red tail boa constrictor in a park. Source: local10.com

September 2007 (Florida): An animal control officer was bitten twice by a 5-foot boa constrictor, on the back of the hand and on the finger. The snake was being removed from underneath a woman's car, where he had wrapped himself around coil springs in the wheel well. Source: abc3340.com

September 2007 (Florida): Firefighters responding to a Delray Beach warehouse found more than 100 snakes in the building, including 8-foot boa constrictors and pythons between 12- and 17-feet long. Several small snakes were killed in the fire. The owner said he sells the animals to retailers. Source: firstcoastnews.com

September 2007 (Florida): Officials removed a python from beneath the deck of a private residence in Collier County. Source: Florida Fish and Wildlife Conservation Commission Field Operations Weekly Report

August 2007 (Ohio): A man brought a 10-foot python to a festival. The snake was killed by a boy who stomped on the animal's head. Source: 13abc.com

August 2007 (Florida): Two large snakes were captured in Lee County: a 10-foot Burmese python found by two maintenance workers at an apartment complex and a boa constrictor longer than 6 feet who was spotted in the middle of an intersection. Source: *Naples Daily News*

July 2007 (Florida): A reticulated python approximately 15-feet long was found in a yard in a residential community. Source: WFTV.com

July 2007 (New York): Two Burmese pythons were found on the loose in Albany. An 8-foot snake had escaped from a second-floor pen and was claimed by the owner. No one had claimed the 4-foot snake. Source: *The Times Union*

July 2007 (Rhode Island): A man took a 6-foot boa constrictor to the police, claiming he found the snake along the road. The police discovered the snake belonged to the man, and he had tried to sell the animal to a pet store the day before. Though the store declined to buy the boa, the man purchased a small python even though he could no longer care for the larger snake. Source: *The Providence Journal's Daily News Blog*

June 2007 (Pennsylvania): Officials caught a 9 1/2-foot Burmese python, but a second large snake remained on the loose. That snake was thought to have killed a cat, a bird, and several kittens. Source: *Courier Times*

May 2007 (New York): A firefighter found a large Burmese python in the basement of a home after a fire was doused. Source: *The New York Times*

April 2007 (Florida): A 7.5 foot Burmese python was captured on Key Largo. The animal was found by researchers tracking a Key Largo wood rat – an endangered species – fitted with a radio transmitter collar. The remains of two wood rats along with the radio transmitter were found inside the python. Source: keynoter.com

April 2007 (Florida): A 3-year-old boy was bitten in the face by a 6-foot boa constrictor when posing with the snake for a photograph at a theme park, and was taken to a hospital for treatment. Source: CBS4

March 2007 (Alaska/Alabama): An Alaska woman took in an 8-foot Burmese python around 2002 after a landlord found the animal without food in an empty apartment, two weeks after the previous resident was evicted. The snake grew to 16 feet, outgrowing the home. The snake was shipped to an Alabama zoo, but during transport she spent many hours in cold temperatures in a small crate. The snake died four weeks later. Source: *Anchorage Daily News* and KTUU.com

December 2006 (Ohio): A man died at the hospital after being strangled by his pet python. Source: *United Press International*

December 2006 (Florida): A 14-foot, 14-year-old Burmese python being exhibited at an aquarium wrapped around the handler's arm and waist and bit her. A police taser was needed to get the snake to let go. The woman was treated at the hospital for wounds to her hands. Previously a man was bitten when feeding the snake. Source: *St. Petersburg Times*

September 2006 (Indiana): A 23-year-old man with experience handling reptiles was killed by his 14-foot reticulated python. A medical examiner determined that the death was consistent with asphyxiation caused by compression of the neck and chest. Source: MSNBC and *The Corydon Democrat*

September 2006 (Montana): A man trying to enter Canada with five snakes turned them over to U.S. authorities rather than obtain the proper permits to export them. Two red-tail boa constrictors were among the animals who were dehydrated and had mites. Source: *Great Falls Tribune*

August 2006 (Michigan): A woman reported her 6- to 7-foot boa constrictor missing. Source: *The Macomb Daily*

August 2006 (Florida): A 9-foot Burmese python was found near the Tallahassee airport. After police initially captured and put the snake in a bag, the animal escaped from the back seat of the patrol car and had to be recaptured. Source: KHOU-TV Animal Attraction Blog

July 2006 (Michigan): Two boa constrictors were on the loose in a matter of days. Source: WJRT-TV

June 2006 (Connecticut): Officials investigating a report of an alligator in an apartment also found 36 snakes including boas, pythons and an anaconda. The tenant had been evicted the previous day. There were two dead lizards and the remaining reptiles were left in extremely dirty and unhealthy conditions, with no food or water. Source: 2006 Annual Report, State of Connecticut, Department of Environmental Protection, Division of State Environmental Conservation Police

June 2006 (Utah): A couple returned surprised to find a former roommate's pet 7-foot red-tailed boa possibly preparing to attack their pet cat. Source: KSL TV

April 2006 (California): A firefighter found a 6-foot anaconda alive among the debris after a fire gutted a music studio. The owner of the studio and snake was arrested on suspicion of setting the fire. Source: *Orange County Register*

March 2006 (Florida): A man driving with his pet snake wrapped around his neck crashed his car into roadwork barricades after the snake began biting him. According to reports, when police first encountered the man, he had numerous small cuts on his body, and freshly dried blood on his forehead and right hand. Source: *Naples Daily News*

March 2006 (Colorado): An evicted renter abandoned a 7-foot constrictor snake in an apartment. Source: *Glenwood Springs Post Independent*

February 2006 (Florida): A man walking his dog – an 8-pound rat terrier – let the dog off his leash. A neighbor's pet python had gotten free and grabbed the dog by the head, wrapping around him. The man used a golf club to get the snake to release the dog, but the dog ran away and was found dead the next day with injuries consistent with constriction. Source: orlandosentinel.com (AP)

February 2006 (Idaho): After being missing for two weeks, a Burmese python was found in the bathroom ceiling of the apartment below the one she from which she escaped, apparently through a hole in the wall. Source: Foxnews.com (AP)

December 2005 (Hawaii): A 4-foot boa constrictor was found in the laundry area of a home. The home was undergoing renovation and the door may have been left open during construction. Source: Hawaii Department of Agriculture

November 2005 (Georgia): A woman found a 7-foot Burmese python in a pillowcase in her backyard. Source: The Associated Press

October 2005 (Florida): A woman looking for her pet Siamese cat instead found a bulging Burmese python in her backyard. X-rays showed that the snake had eaten the cat. Source: NBC6.net

October 2005 (Florida): A 10-foot African rock python was found after crawling into a turkey pen and eating a turkey. The bulging snake was too large to fit back through the fence. Source: NBC6.net

September 2005 (Delaware): An 8-foot boa and three 4- to 6-foot boas were abandoned at an apartment complex after a tenant's eviction. The local animal shelter was helping place those snakes, plus a fifth one about 5-feet long who was seized the same week from a man walking in the street with the snake around his neck. Source: *The News Journal*

September 2005 (Florida): Captured in a now-famous photograph, the body of a Burmese python who tried to swallow an alligator was found in the Everglades. Source: *St. Petersburg Times*

August 2005 (Missouri): A UPS driver found a 9-foot Burmese python among packages in his truck. The teenager who ordered the snake instead received an empty box. The python was shipped in a plastic container that was taped shut and placed inside the box. The tape was intact but the container was cracked and the cardboard box had tears in it. Source: First Coast News (AP)

July 2005 (California): A 15-foot Burmese python was discovered in a Sacramento warehouse. The animal belonged to a man who worked down the street. He had

unknowingly poked a hole in the cage with a forklift. This was the snake's third escape. Source: *The Sacramento Bee*

July 2005 (Pennsylvania): The owners of a 9-foot Burmese python turned the snake over to authorities. The animal was reportedly underfed and living in a cage that was too small. Source: *The Intelligencer Journal*

June 2005 (Arkansas): Wildlife officials say there have been two sightings of yellow anacondas in the Wapanocca National Wildlife Refuge, one by a person fishing in 2004 and a recent sighting by a wildlife official. Source: KAIT8.com

June 2005 (Florida): Police responded twice in a month to reports of snakes roaming a neighborhood. A 13-foot Burmese python was recaptured, then got loose and was recaptured again. An 8-foot python (and five monitor lizards) remained at large. Source: News4Jax.com

February 2005 (Florida): A giant python was found sprawled across a busy street in Englewood. Source: *Venice Gondolier-Sun*

November 2004 (Connecticut): A New Haven couple reported their 15-foot python was missing. Authorities responding did not find the python, but did find other animals the couple had illegally including an Argentinean boa. Source: WTNH

September 2004 (Michigan): A 6-foot boa constrictor escaped from a home. Source: cm-life.com

September 2004 (Mississippi): A 17-foot Burmese python missing for four days was lured out of hiding with a rabbit. The snake had escaped from the bathroom where she was being kept when the door was left open, and taken refuge underneath insulation in the attic of the apartment building. Source: *The Sun Herald*

August 2004 (Florida): A green anaconda was collected from Big Cypress Swamp in Collier County. Source: U.S. Geological Survey Nonindigenous Aquatic Species Database

August 2004 (Texas): Authorities searched for weeks for a large snake who was reported missing. A 7-foot python believed to be a different animal was caught the previous week at a landscaping company. The curator of the Houston Zoo's herpetology department said his department receives dozens of calls each week from people looking to turn over a snake to the zoo – 15 to 20 calls per week just on boas. Source: *Brenham Banner-Press* and *The Associated Press*

July 2004 (Florida): A 16-foot-long Burmese python was captured on a city street. An animal control officer said he had picked up dozens of loose Burmese pythons and boa constrictors over the years, but this was the largest. Source: cbsnews.com

June 2004 (Kansas): A teenager was showing off the family's 15-foot pet python when the animal coiled around his arm and began to squeeze, turning the boy's arm blue. The snake bit the teen and his mother, and they called 911. Emergency crews used a fire extinguisher to get the snake to loosen his grip. Source: News4Jax.com

February 2004 (Florida): A 14-foot reticulated python escaped. Source: Local6.com

October 2003 (New Jersey): Pythons, boa constrictors, and an anaconda were among the 180 reptiles authorities took into custody when their caretaker had not been seen for a week. The man was in the hospital being treated for a venomous snake bite. Source: *The Star-Ledger*

September 2003 (Virginia): A Burmese python about 12-feet long was found after being on the loose for more than three weeks. The snake had pushed open a window to escape. Source: *The Virginian-Pilot*

September 2003 (Florida): A teenager took his 9.5 foot Burmese python into the backyard and the animal disappeared. He found the snake 20 hours later in the neighborhood. Source: *The News-Press*

September 2003 (Florida): A couple walking their dogs spotted a boa constrictor. They called rescue workers who picked up the animal. Source: *St. Petersburg Times*

August 2003 (Illinois): A man was doing plumbing work at home when he heard that a snake had gotten loose in the area. Two days later, after driving many miles, he found the 6-foot boa constrictor under the hood of his van. Source: *Chicago Daily Herald*

August 2003 (Washington): A man found an escaped 7-foot python passing through his yard. The week before, a park ranger found a similar-size python in a lake. The local animal shelter generally takes in about 10 loose snakes a year. Source: *The Seattle-Post Intelligencer*

August 2003 (Arizona): Authorities took a 12-foot Burmese python from a yard. The mobile homes on the property seemed to be vacant, and the animal appeared to be abandoned. Source: The Associated Press

August 2003 (Florida): A 12-foot Burmese python escaped from a Florida home and was on the loose. Source: United Press International

July 2003 (Connecticut): A 3-foot boa constrictor was found outside a condominium complex. Source: *Connecticut Post*

July 2003 (Florida): A man reported his 12-foot Burmese python was missing and had not eaten for a week. A neighbor found the snake the next day. The python had a bulge in his stomach but it was unclear what he had eaten. Source: *The Bradenton Herald*

July 2003 (Rhode Island): A 14-foot Burmese python escaped from his tank and through a window screen. Source: The Associated Press

June 2003 (Florida): A 13-foot Burmese python escaped from a home. The mother of the snake's owner found the snake in the yard wrapped around her 3-year-old Mountain Feist dog. She was able to free the dog, but the snake then wrapped around her leg. Rescue workers freed her and returned the snake to his cage. Source: *Florida Today*

June 2003 (Maryland): A man was charged with animal cruelty following an investigation of conditions at a reptile wholesale business in a warehouse. Boa constrictors were among the animals being housed in the facility; 199 animals were found dead. Source: *Washington Post*

June 2003 (Florida): More than 100 snakes were stolen from a breeder, including 10 boa constrictors. Other snakes were left crawling loose in a room, including one who was found crawling out a broken screen. Source: *Tampa Tribune*

June 2003 (Illinois): Officers found an 8-foot reticulated python on a bike trail in Blackwell Forest Preserve; previously a 5-foot boa was found. Source: Illinois Department of Natural Resources Office of Law Enforcement

May 2003 (California): Authorities removed a red-tailed boa constrictor from a home, along with 100 to 200 mice, about three dozen rats, and a cat. They found debris piled in the house, which smelled of animal waste. Source: *San Jose Mercury News*

October 2002 (California): A 6-foot boa constrictor was spotted on a fence and on the loose until being captured a day later. Source: City News Service

September 2002 (New Jersey): A 7-foot boa constrictor was found in a roadway. Source: *The Star-Ledger*

September 2002 (Ohio): A 10-foot Burmese python escaped and was on the loose about three weeks. The snake was found in a vacant home being renovated, with a telltale bulge in its middle. X-rays showed the snake had eaten a small canine, possibly a fox or stray dog. Source: The Associated Press

September 2002 (Tennessee): A Burmese python about 8- to 10-feet long escaped – for the second time. The first time the snake was at large for about a month. Source: *Knoxville News-Sentinel*

July 2002 (Texas): A landlord in southwest Houston found reptiles including three Burmese pythons in a house he owns. The reptiles were in cages and had been abandoned for at least two months. None of the cages had water and the animals were dehydrated. Source: *KSBW.com*

July 2002 (Maine): A sheriff's deputy investigating an abandoned SUV was startled to discover a 5-foot-long boa constrictor in the back seat and another snake coiled in a terrarium. Source: *Portland Press Herald*

July 2002 (Louisiana): A 12-foot Burmese python escaped and was recaptured a week later. Source: *Times-Picayune*

June 2002 (North Carolina): A 12-foot pregnant Burmese python escaped and was on the loose for two days. Source: *News & Record (Greensboro)*

May 2002 (Florida): Six snakes ranging in length from 9 to 20 feet escaped from a woman's apartment. Two were found curled up in a friend's apartment, but authorities were looking for four large Burmese pythons. Source: *Florida Today*

April 2002 (Florida): An 18-foot Burmese python who had been living for at least a year near a service plaza on Florida's Turnpike was captured. A state crew mowing the grass in the area had reported seeing the animal a year before, and there had been several sightings since. Source: *Orlando Sentinel*

February 2002 (Colorado): A man had his pet Burmese python wrapped loosely around his neck when the snake suddenly constricted. By the time rescue workers wrestled the animal off the man, it was too late and he later died. Source: *Rocky Mountain News*

December 2001 (California): A 3-month-old infant was taken to an emergency department after a day of bloody diarrhea and fever caused by *Salmonella*. The infant's father was a high school biology teacher who often draped a large snake (i.e., a boa) over his shoulders in the classroom. He would wash his hands – but not change his clothing – before going home and holding his child. The snake was found to be the source of the child's *Salmonella*. Source: U.S. Centers for Disease Control and Prevention

April 2001 (Oklahoma): A woman died from septic shock related to a *Salmonella* infection after obtaining a transfusion of blood platelets. The platelet donor's 9-foot pet boa constrictor was identified as the likely source of the *Salmonella*. The type of *Salmonella* found in a stool sample from the snake matched that found in the platelets. The man exhibited no symptoms at the time of his donation, but had been ill two weeks before and taken antibiotics. A second patient who received platelets from the man also contracted *Salmonella* but was healthier to begin with and lived. Source: *The New England Journal of Medicine*

August 2001 (Pennsylvania): An 8-year-old girl was strangled by her father's pet Burmese python. The child had been left home alone, and the snake broke through the top of the cage. Paramedics said she was not breathing when they arrived; she was taken to a hospital and placed on a ventilator until she was pronounced brain dead two days later. An autopsy showed the cause of death was compression of her neck and chest. Source: *The Augusta Chronicle* (Scripps) and *Pittsburgh Post-Gazette*

August 1999 (Illinois): A couple's 7.5-foot African rock python escaped from an enclosure and killed their 3-year-old son. Source: *St. Louis Post-Dispatch*

October 1996 (New York): A 13-foot python, kept as a pet by two teen-age brothers who hoped to have careers caring for reptiles, killed one of the brothers, possibly mistaking him for food. The 19-year-old was found by a neighbor with the snake coiled around his midriff and back. Source: *The New York Times*

1993 (Colorado): A 15-year-old was killed by his brother's 11-foot pet python. He had snake bites on his body, and an autopsy found he was suffocated. The 8-year-old snake had been a family pet since she was only a foot long. Source: The Associated Press

1984 (Iowa): An 11-month-old boy was killed by his father's 10-foot pet python who escaped from an enclosure. Source: *Fort Madison Daily Democrat* and *The Loss of Innocents* by Cara Elizabeth Richards

1983 (Missouri): A man was crushed to death by his 16-foot pet Burmese python. Source: The Associated Press

August 1982 (Nevada): An 8-foot python escaped from his cage, crawled into an adjoining bedroom, and killed a 21-month old boy in his crib. The snake belonged to an unrelated man who lived in the house. Source: United Press International

November 1980 (Texas): A 7-month-old girl was killed by her father's 8-foot pet reticulated python. The child died of asphyxiation and her head was covered with dozens of needle-like tooth marks. The snake had forced his way out of a covered 30-gallon aquarium and crawled into the baby's crib. Source: The Associated Press

Compiled from news reports by The Humane Society of the United States

20 January 2010

Bobby Scott
Chairman
House Subcommittee on Crime, Terrorism, and Homeland Security
1201 Longworth House Office Building
Washington, DC 20515

Dear Chairman Scott:

We are writing in support of the report recently released by the U.S. Geological Survey (USGS), *Giant Constrictors: Biological and Management Profiles and an Establishment Risk Assessment for Nine Large Species of Pythons, Anacondas, and the Boa Constrictor*. The undersigned scientists believe that this report is based on peer-reviewed and transparent science and the risk assessment model used in the report is reasonable and appropriate, notwithstanding claims made in a recent letter submitted to this subcommittee by the U.S. Association of Reptile Keepers (USARK) challenging the validity of the USGS report.

The USGS study is unbiased and was not developed to support a predetermined policy, as suggested by the USARK letter. The USGS report was written with the intention of informing future U.S. Fish and Wildlife Service and National Park Service management strategies, not to respond to or support policies that had already been developed or established. The report was requested by the agencies and specifically aimed to collect information on the risks of giant constrictor snakes on ecosystems, wildlife, and human safety.

USGS peer-reviews all work that receives agency funding. This particular report was reviewed by 20 experts associated with U.S. and international universities, agencies, and organizations. In fact, 18 of the 20 reviewers who scrutinized this study were from institutions or agencies outside the USGS, contrary to USARK's allegations that the report is not externally peer-reviewed.

While we understand the value of scrutinizing research models, results, and conclusions, we believe USARK's unsubstantiated allegations are unprofessional and undermine important efforts being made by the scientific community.

Thank you for taking the time to consider our professional perspectives. We hope that in considering legislation to regulate large constrictor snakes you will use the USGS report without reservation.

Sincerely,

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Waldorf College

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Senior Scientist and Director, Invasive Species
Union of Concerned Scientists



Fact Sheet

Constrictor Snake Incidents 1980 to present

The following is a partial listing of more than 200 incidents involving constrictor snakes in 43 states and the District of Columbia since 1980. These incidents have resulted in the deaths of 15 people, including 7 children, and more than 20 injuries. This list includes attacks, escapes, abandonment, *Salmonella* infections, and cruelty cases collected from government reports and news articles.

May 13, 2011 (Teaneck, New Jersey): Police captured a 6-foot boa constrictor near Brett Park after an area resident reported seeing the snake slithering across a street. Source: Teaneck Patch

May 6, 2011 (Hershey, Pennsylvania): A 6-foot-long boa constrictor was found near a parking area of a cemetery. The snake was suffering from a respiratory ailment. Source: Reuters

April 27, 2011 (Coolville, Ohio): Elementary school officials expressed concern about a woman who regularly placed her 4-foot-long python in a tree that was next door to the school. Source: WBNS-10TV

April 16, 2011 (Port Washington, Wisconsin): A 16-year-old girl was bitten by her family's pet ball python and treated at a local medical clinic. Source: *Washington-Saukville Patch*

April 12, 2011 (Kansas City, Missouri): A woman was attacked when she removed an 8-foot-long python from its cage for feeding. The snake latched its jaws onto the side of the woman's neck and would not let go. A child in the house called police and an officer forced the jaws of the snake apart with his hands. Source: Reuters

April 6, 2011 (North Richmond, Virginia): A 3- to 4-foot long boa constrictor was found curled in the corner of a bathroom in a North Richmond apartment. It was subsequently discovered that the snake had been hiding in an easy chair brought into the apartment the week before. Source: WISN

March 25, 2011 (Greenwood, Indiana): A 4-foot-long baby python was removed from the ceiling vent of a University of Indianapolis student's apartment. It was determined that the snake had likely belonged to a former tenant who kept snakes in the apartment below. Source: The Indy Channel

March 22, 2011 (Lewisville, Texas): An 11-foot-long reticulated python was found in the breezeway of an apartment complex. Source: NBC Dallas-Fort Worth

February 17, 2011 (Urbana, Missouri): Two men found a dead 14-foot Burmese python in a wooded area near Urbana. Source: KY3.com

January 27, 2011 (Tarpon Springs, Florida): It took three police officers to capture a 14.5-foot, 150- to 200-pound African rock python was discovered sunning herself near an apartment complex. The snake had vanished from the Tarpon Springs Aquarium two years earlier and was described by the aquarium's owner as "extremely aggressive." Source: WESH-TV

January 6, 2011 (Boston, Massachusetts): A woman lost her 3-year-old Dumeril's boa while riding a commuter train in Boston. The snake was spotted nearly a month later by a passenger on the train and it



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took transit authorities 10 hours to recapture the animal. The woman refused to reimburse the city's \$650 cost to disinfect the train. Source: *The Boston Globe*

December 13, 2010 (Melbourne, Florida): A 13-foot-long python was discovered by a contracting crew fewer than 10 feet from several back yards in a housing subdivision. Source: WESH-TV

November 17, 2010 (Lancaster, California): Upon returning to her car after shopping, a woman discovered a 10-foot-long boa constrictor wrapped around the car's engine. It took animal control authorities half an hour and the help of some cooking oil (to loosen the snake's grip) to capture the python. Source: NBC LA

October 20, 2010 (Harlem, New York): While working in a Harlem park, a Parks Department employee came across a 6-foot-long Burmese python hiding in the bushes. Source: DNAinfo.com

October 14, 2010 (Palm Bay, Florida): A 6-foot-long, 70- to 80-pound boa constrictor was found alive inside a trash can. Source: WKMG

October 12, 2010 (Traverse City, Michigan): A woman moving wood pallets behind a business was startled by a 4-foot-long boa constrictor. Police heard her screams and responded. Source: WOOD-TV

October 8, 2010 (Orlando, Florida): A couple was cleaning out their garage when they found a 5 1/2-foot Burmese python and called authorities to retrieve the animal. Source: WESH-TV

October 5, 2010 (East Greenwich, Rhode Island): Firefighters rescued an 18-foot-long Burmese python from the second story of a burning home. Source: Digital Journal

October 2010 (Florida): An Orlando couple was cleaning out their garage when they found a 5 1/2-foot Burmese python and called authorities to retrieve the animal. Source: WESH-TV

October 2010 (Pennsylvania): An 11-foot constrictor snake was found dead in the bed of a Fairview Township resident's pickup truck. Source: *The York Dispatch*

September 18, 2010 (Harris County, Georgia): Two hunters encountered and captured a 7-foot-long boa constrictor on the loose. Source: WTVM-TV

September 14, 2010 (Bell Gardens, California): A 15-year-old boy was bitten on the hand while he was sleeping by a boa constrictor. The family had just moved into a new home and a neighbor claimed that the former resident's pet boa constrictor had gone missing. Source: KABC-TV

September 12, 2010 (Cambridge, Massachusetts): A man found a 4-foot boa constrictor in his apartment. The animal has possibly entered through an open window, seeking warmth. Source: *The Boston Globe*

September 2010 (Illinois): A 9-foot boa constrictor was reported on the loose in Maroa. Three weeks later, the animal was found about a block away from a high school after being hit by a car. Source: *Herald & Review*



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September 2010 (New Jersey): A nearly 5-foot boa constrictor was living behind drywall and beneath an apartment floor. Wrappers suggested someone was feeding the animal candy bars. The resident said her brother lost the snake in the apartment. A maintenance worker went into the crawl space and retrieved the snake. Source: *The Daily Journal*

August 29, 2010 (Fayetteville, Arkansas): A woman stepped outside to walk her dog and found a 9 ½ foot Burmese python on her porch. The snake had escaped approximately one month previously from home about a half-mile away. Source: 4029TV.com

August 29, 2010 (Lafayette, Indiana): An 11-foot long Burmese python was spotted by fishermen along a creek bank and in the vicinity of two families with young children playing. Authorities responded and shot and killed the snake. Source: The Indy Channel

August 28, 2010 (Fond du Lac, Wisconsin): A Fond du Lac resident reported the escape of a 6-foot water boa. The snake was found four days later in the owner's garage. Source: WLUK-TV

August 26, 2010 (Sebastian, Florida): A Sebastian woman was attempting to feed her 12-foot Burmese python when it bit her hand and constricted around her arm. The woman was treated at a medical center and authorities euthanized the snake. Source: tcpalm.com

August 25, 2010 (Thousand Oaks, California): An 8 1/2-foot-long, 50-pound Burmese python was spotted in bushes next to a condominium complex. It took three firefighters to remove the snake. Source: *Ventura County Star*

August 23, 2010 (Secaucus, New Jersey): A 7-foot boa constrictor was found in a drainage pipe at a warehouse. Source: *Hudson Reporter*

August 12, 2010 (Springfield, Massachusetts): A woman who was snake-sitting called police after a 6-foot-long anaconda escaped from an aquarium and she was unable to recapture the animal. Source: WGGB

August 2010 (Alabama): A dead 9 ½ foot boa constrictor was found in Lawrence County. Source: *The Decatur Daily*

August 2010 (New Hampshire): Police were called when a 6-foot boa constrictor, reportedly malnourished, was found outside a condominium complex. Source: bostonherald.com

August 2010 (North Royalton, Ohio): A 6-foot-long python was found on a picnic table at a nature park.

August 2010 (Riverdale, Utah): Two boa constrictors were found stuffed into bins and abandoned in a dumpster. The 6-foot snake survived but the smaller one died. Source: ABC 4 News

July 29, 2010 (Forest, Virginia): An 8-foot boa constrictor was found roaming loose in a neighborhood and was captured by wildlife officials after he went up a tree. The owner said the snake pushed through the top of his cage and went out a window. Source: WSET-TV



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July 27, 2010 (Winnebago County, Illinois): An 8-foot boa constrictor was found along the side of the road on Bypass 20 in Winnebago County. Source: WREX-TV

July 25, 2010 (Covina, California): A 7-foot boa constrictor was spotted in the engine bay of a car in a store parking lot. Source: NBC LA

July 12, 2010 (Medina, Ohio): Police found a boa constrictor on the loose. Source: Cleveland.com

July 2010 (West Palm Beach, Florida): A 6-foot Burmese python broke out of a cage at a West Palm Beach auto body shop and was found crossing the street by a police officer. Source: *Palm Beach Post*

July 2010 (Florida): Authorities confiscated 5 Burmese pythons, a 14-foot reticulated python, and various venomous snakes found without proper licenses during a drug raid. Source: *The Daytona Beach News-Journal*

July 2010 (Danville, Virginia): A 5-foot boa constrictor escaped from a woman's car and was on the loose in Danville. Source: WEST-TV

June 28, 2010 (Albuquerque, New Mexico): Officials seized at least 50 snakes, mostly boa constrictors, from appalling conditions in an Albuquerque home. The apartment was full of trash and feces and dead snakes were found in a tub. Three children lived in the home, one of whom no longer slept in her bedroom because of the trash, feces, and snakes. The children's mother was charged with misdemeanor child abuse. Source: KOAT-TV

June 27, 2010 (Hope, Indiana): A 1-year-old boy was bitten on the hand by a 4-foot-long pet boa constrictor who escaped from a cage and was hiding in a dresser drawer. The snake had been on the loose for a few days. Source: *The Republic*

June 19, 2010 (Oak Harbor, Washington): Officers on a drug raid were warned that a boa constrictor and python were loose in the apartment. The detectives found the 7-foot boa constrictor, but the python remained hidden behind the refrigerator.

June 9, 2010 (Papillion, Nebraska): A man was strangled by his 9-foot-long pet boa constrictor while showing the animal to a friend. The man had often taken the snake outdoors and let children play with the animal. Source: *Omaha World-Herald*

June 2010 (North Carolina): A snake skin found by a postal worker sparked fears that a boa constrictor was on the loose; in fact the 7-foot snake was at home but the owner had tossed the shed skin outdoors. Source: *The Chapel Hill News*

May 2010 (Alabama): A couple walking along a nature trail found a red-tailed boa constrictor approximately 10 feet long. Source: WAFF 48 News

May 2010 (Florida): A Miami man was offering reticulated pythons for sale on Craigslist, without the proper license. Source: *Sun Sentinel*

May 2010 (Florida): A woman found a 4-foot Burmese python under her car. Source: WESH.com



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May 2010 (Milwaukee, Wisconsin): Authorities removed more than 200 animals from squalid conditions in a Milwaukee home and another building, including five anacondas -- some 20 to 30 feet long -- and at least 24 boa constrictors. Source: *Journal-Sentinel* and *Wisconsin State Journal*

April 1, 2010 (Grants Pass, Oregon): An 8-foot boa constrictor was on the loose in Grants Pass after the snake's owner's roommate mistakenly let the snake out. Source: *The Oregonian*

March 18, 2010 (Washington, DC): A boa constrictor was found in an abandoned apartment. A company hired to clean the apartment found the snake but accidentally turned off the heat lamp. The animal was without heat for about a day. Source: *The Washington Post*

March 2010 (Florida): A man driving in Collier County saw a Burmese python longer than 9 feet in the road. He captured the snake and cut off his head with a small pocket knife. Source: WOAI.com

March 2010 (Florida): A man on a tractor in Rookery Bay National Estuarine Research Reserve spotted an 11-foot Burmese python. He was able to capture the snake with the help of two other men, but two smaller snakes escaped. Source: naplesnews.com

March 2010 (Florida): A cleaning crew found a dead constrictor snake at a foreclosed home and notified authorities, who found 75 to 100 dead snakes, including some dead for so long their carcasses had liquefied in their holding containers. Source: wtlx.com

March 2010 (Louisiana): The owners of a snake breeding business with nearly 250 snakes were charged with animal cruelty when authorities found poor sanitary conditions. They also did not have the required state permits for 22 snakes exceeding 12 feet. Source: kplctv.com

January 21, 2010 (Orlando, Florida): A woman found a 5-foot boa constrictor in the water heater closet of her apartment. Source: WFTV

January 13, 2010 (Osceola County, Florida): A 12-foot green anaconda was discovered in a drain pipe leading to a pond and captured by Osceola County deputy sheriffs. Source: *Orlando Sentinel*

January 2010 (Florida): South Florida Water Management District personnel captured 25 Burmese pythons and five African rock pythons in South Florida in the first three weeks of January. Source: South Florida Water Management District

December 22, 2009 (Keaau, Hawaii): A homeowner discovered a 6-foot-long boa constrictor in his garage. Source: *Hawaii News Now*

December 2009 (Arkansas): Pythons were among the reptiles two University of Arkansas students were keeping in their dorm room and selling on line. Source: 4029TV.com

December 2009 (Arizona): Yuma firefighters were called to remove an approximately 7-foot constrictor snake from the backyard of a residence. The animal was found to have escaped from a nearby home. Source: *Yuma Sun*



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December 2009 (Florida): A Tampa woman found a 12-foot Burmese python in her yard. When she called state officials for help, they suggested she use a shovel to chop the snake's head off. Instead a neighbor sought help at a fire station. A state spokesperson later said they should have assisted. Source: wltx.com

December 2009 (Florida): A woman arrived home to find her two dogs running around. She found an 8-foot boa constrictor coiled beneath a tree. Source: mysuncoast.com

December 2009 (Texas): Authorities removed as many as 27,000 animals including constrictor snakes from an exotic animal dealer in what was reportedly the largest animal cruelty seizure in U.S. history. Source: *Fort-Worth Star Telegram*

November 27, 2009 (Yonkers, New York): A 5-foot boa constrictor was found on a Yonkers street. Source: WPIX-TV

November 2009 (California): A 5-foot boa constrictor was found along the edge of a lagoon in Carlsbad. Source: *North County Times*

November 2009 (Florida): A 7-foot python was found in a backyard in Broward County. Source: Florida Fish and Wildlife Conservation Commission Division of Law Enforcement Field Operations Weekly Report

November 2009 (Florida): A dead 9-foot boa constrictor was found in a ditch next to a condominium in north Naples. The snake appeared to have been hit by a vehicle. Source: Florida Fish and Wildlife Conservation Commission Division of Law Enforcement Field Operations Weekly Report

November 2009 (Florida): A man was charged with animal cruelty after authorities found numerous dead snakes along with two live boa constrictors and one live python in his Citrus Park home. Source: cfnews13.com and Hillsborough County Animal Services

October 17, 2009 (Compton, California): A 7-foot boa constrictor was found wrapped around a car engine compartment. The snake was reportedly one of three that had been abandoned in a box on a street corner. One of the snakes was dead. Source: *Chicago Tribune*

October 8, 2009 (Fall River, Massachusetts): After being spotted for five days sunbathing on the roof top of a six-family apartment building, a 5-foot boa constrictor was caught in a makeshift trap. The landlord had recently found an empty aquarium left by a former tenant. The snake was reportedly sick with an upper respiratory infection and approximately 10 pounds underweight. Source: *The Boston Globe*

October 2009 (Florida): A mother and daughter found an 8- or 9-foot Burmese python in their residential neighborhood in Vero Beach. This was said to be the second nonnative snake caught in Vero Beach this year. Source: 12 News

October 2009 (Florida): Authorities found an 11-foot Burmese python crawling uncaged in a Crestview man's home. Source: Florida Fish and Wildlife Conservation Commission



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October 2009 (Florida): Charges were filed against a Wewahitchka man after his 11-foot Burmese python escaped and was killed in a neighbor's chicken coop. The man had no cage for the snake, who crawled freely about the Wewahitchka apartment. Source: Florida Fish and Wildlife Conservation Commission

October 2009 (North Carolina): Two brothers found an injured 7-foot boa constrictor in a driveway. Source: Star News Online

September 2009 (Arkansas): An 11-foot Burmese python escaped from an enclosure in a garage, was found in a neighbor's yard, and was recaptured. Source: *The Morning News*

September 2009 (Florida): A 10-foot boa constrictor was on the loose in Hillsborough County. Wildlife officials say they are not going after the snake because so many people have dumped pet snakes, and they don't have the resources to go after them all. Source: Fox Tampa Bay

September 2009 (Florida): A 7-foot reticulated python was found near a state park. Source: *Sarasota Herald-Tribune*

September 2009 (Florida): A dead 10-foot python was found in the water at the Largo Nature Preserve. Source: *Largo Leader*

September 2009 (Florida): An 8-foot python was found along a roadside in Placer County. Source: KTVU.com

September 2009 (Florida): Authorities removed two large Burmese pythons from a Lakeland home, an 11-foot male and a 17-foot female who weighed more than 150 pounds. Source: Florida Fish and Wildlife Conservation Commission

September 2009 (Florida): Authorities were alerted to an 18-foot Burmese python at an Apopka home. The snake reportedly weighed 400 pounds and was 30 inches around. Source: WBIR.com

September 2009 (New York): A 10-foot Burmese python was on the loose in Elmira Heights. This was the second time one of the owner's pythons escaped into the neighborhood. Source: WETMtv.com

August 2009 (California): A boa constrictor between 6- and 8-feet long was found on a road in Escondido. Source: *North County Times*

August 2009 (California): An 11-foot Burmese python escaped from a Riverside County home and was found in a neighbor's yard. Source: *The Press Enterprise*

August 2009 (Florida): A 5-foot boa constrictor was found on a Daytona Beach road. Source: *News Journal Online*

August 3, 2009 (New Port Richey, Florida): A couple moving into a new home discovered an 8-foot-long, 40-pound red-tail boa constrictor who had been left behind by the previous owner. The snake was underweight and sick. Source: WFTV



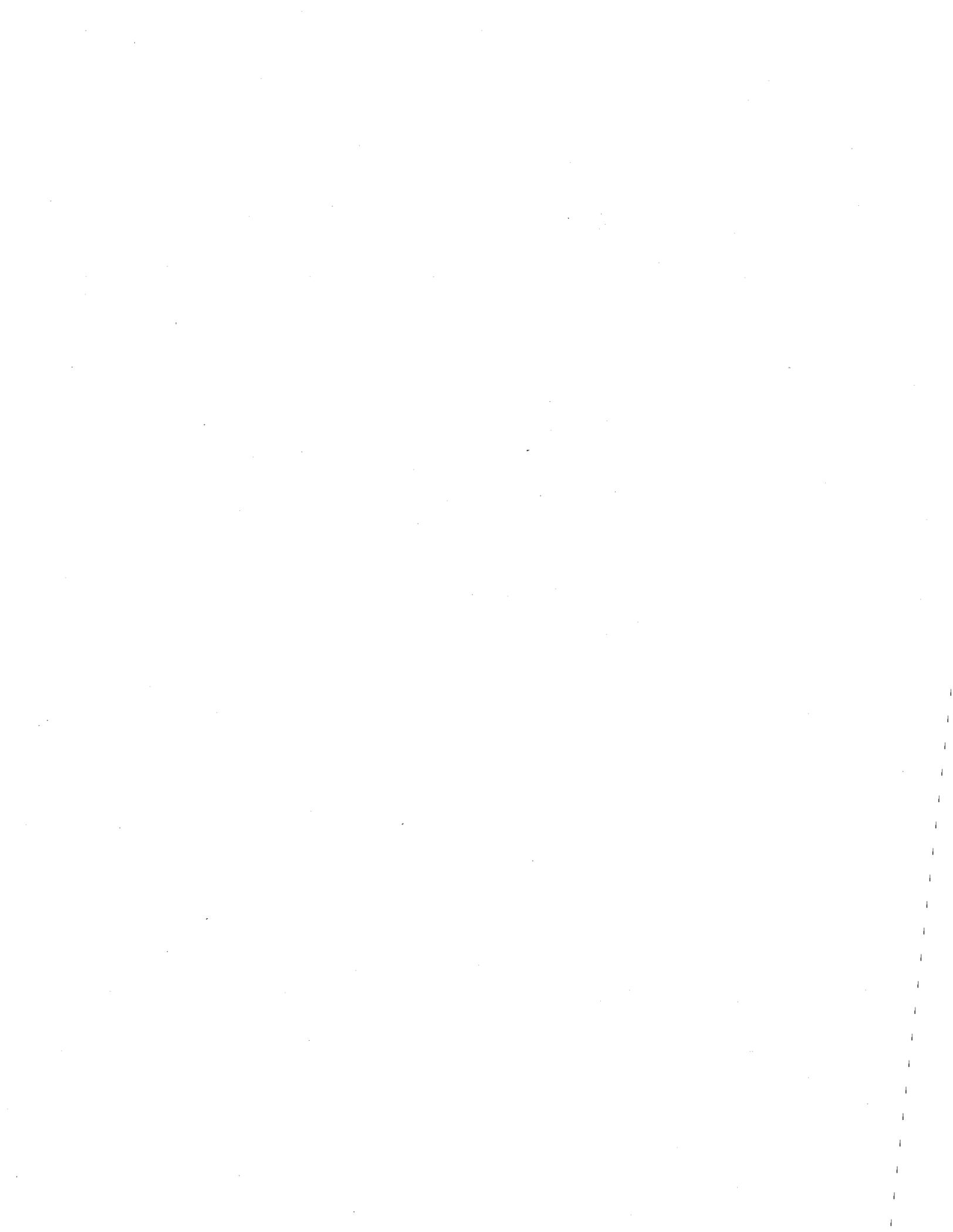
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June 2009 (Wisconsin): Police gave a couple two weeks to remove 22 boa constrictors from their Janesville apartment. One was about 6 feet long, another about 4 feet long, and 20 were small (3 months old). Source: GazetteXtra.com

May 2009 (Florida): A Punta Gorda police officer removed an injured 4.5-foot python from an intersection. The snake suffered from a broken jaw and died soon afterward. Source: NBC2 News

May 2009 (Florida): An investigation into the escape of a 10-foot Burmese python in Pinellas Park determined the snake had escaped almost two months earlier. Source: Florida Fish and Wildlife Conservation Commission Division of Law Enforcement Field Operations Weekly Report

May 2009 (Maine): A 2-foot boa constrictor escaped from a cage in a high school. He hid in an old computer printer, and was not discovered until the school gave the printer to a student to take home and dismantle. Source: WHNT 19News (AP)

April 2009 (Wisconsin): Authorities removed a stash of exotic animals from a Milwaukee home, including a 14-foot reticulated python, a 5-foot boa constrictor, a 4-foot green anaconda, and a 3-foot rock python. Source: *Journal Sentinel*

February 17, 2009 (Brooklyn, New York): Two 7-year-old boys discovered a 4-1/2-foot boa constrictor behind the cushions of a living room couch. Authorities speculated that the snake entered the first-floor apartment by way of a toilet. Source: *Daily News*

February 2009 (California): Police and animal control officers searched for a 23-foot reticulated python weighing approximately 120 pounds who escaped from a San Luis Obispo home. Source: www.ksby.com

February 2009 (Wisconsin): Two Burmese pythons were turned over to a shelter after the owners were arrested on drug-related charges. Source: *Beloit Daily News*

January 2009 (Nevada): A 3-year-old boy was bitten and squeezed to the point of unconsciousness by an 18-foot python. His mother stabbed the snake with a kitchen knife and freed the child. The snake had been in the home for four to six weeks. Source: kvbc.com and *Las Vegas Review-Journal*

January 2009 (New York): A 7-foot reticulated python escaped from an enclosure, and authorities were called to capture and remove the snake. Source: *New York Daily News*

January 2009 (New York): A Burmese python was found in a field in Brooklyn. The cold weather had taken a toll on the animal who had lost an eye and developed an infection, causing some teeth to fall out. Source: *York Daily Record*

January 2009 (Washington): Firefighters rescued a boa constrictor, python, and other animals before flames engulfed a North Spokane home. Source: nwcm.com

December 2008 (Covedale, Ohio): A man called animal control when his 6-foot boa constrictor became aggressive during a nighttime feeding. Authorities helped find the snake a new home. Source: WLWT



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Fact Sheet

November 2008 (Florida): A woman nearly tripped over a 10-foot boa constrictor in Punta Gorda. Source: nbc-2.com

November 2008 (Florida): Investigators captured three Burmese pythons, ranging from 9 to 11 feet, within a 50-yard span of an area known as the 8.5 Square Mile in Miami-Dade County. Source: Florida Fish and Wildlife Conservation Commission, Division of Law Enforcement Field Operations Weekly Report.

October 21, 2008 (Virginia Beach, Virginia): A woman was strangled by her 13-foot-long pet reticulated python, apparently when she was attempting to administer medication to the animal. Source: *The Virginian-Pilot*

October 2008 (Colorado): A woman was attacked by her 6-foot albino Burmese python. The animal was sprayed with a fire extinguisher to get him to let go of her finger and then according to the woman it took five paramedics to hold the snake down. Source: KRDO.com

October 2008 (Florida): A 12-foot 100-pound Burmese python was found crossing a road in Jupiter Farms. The snake appeared to be injured and may have been hit by a car. Source: South Florida Sun-Sentinel.com

September 19, 2008 (Vero Beach, Florida): An animal control officer was called out at 2 am to capture a 10-foot-long boa constrictor found on a busy road.

September 2008 (Florida): A Myakka City homeowner found a 10-foot albino Burmese python in her driveway. Source: *Sarasota Herald-Tribune*

September 2008 (Oklahoma): A woman found a 4-foot boa constrictor in her motor home. Source: *The McAlester News-Capital*

August 2008 (Michigan): A state trooper shot and killed a nearly 7-foot long snake, believed to be a Burmese python, seen on a Port Sheldon Township road. Source: *The Grand Rapids Press*

August 2008 (Nevada): A 13-year-old girl visiting her father was attacked by a pet Burmese python; her father killed the approximately 15-foot snake to rescue her. The snake reportedly escaped from a large tank with locks. The same day, a student zookeeper in Venezuela was crushed to death by a Burmese python. Source: KVBC

July 16, 2008 (Gorham, Maine): A woman discovered an 8-foot-long live python mixed in with clothes in her washing machine.

July 2008 (Maine): A man discovered an 8- to 9-foot reticulated python under the engine compartment of his pickup truck in Wilton. It was the second such incident in Maine in less than a week. A Gorham woman found a reticulated python in a washing machine. The snake had injuries on its upper jaw from being dragged. Source: *Sun Journal*

June 2008 (Florida): A woman found a 7-foot Burmese python in her Key Largo yard. She and a friend killed the snake. Source: *The Reporter*



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