



## U.S. FISH & WILDLIFE SERVICE REOPENS COMMENT PERIOD FOR PROPOSAL TO LIST NINE SPECIES OF LARGE CONSTRICTORS AS INJURIOUS WILDLIFE UNDER THE LACEY ACT

**\*\*NEW COMMENT DEADLINE AUG. 2<sup>nd</sup> \*\***

The U.S. Fish and Wildlife Service has reopened the comment period for its proposal to list nine species of large constrictors as injurious wildlife under the Lacey Act. Originally proposed in March, the 22-page proposal, along with key underlying documents relied upon by the Service in making its recommendations, calls for listing the following large constrictor snakes:

- (1) *Python molurus* (Indian [including Burmese] python).
- (2) *Broghammerus reticulatus* or *Python reticulatus* (reticulated python).
- (3) *Python sebae* (Northern African python).
- (4) *Python natalensis* (Southern African python).
- (5) *Boa constrictor* (boa constrictor).
- (6) *Eunectes notaeus* (yellow anaconda).
- (7) *Eunectes deschauenseei* (DeSchauensee's anaconda).
- (8) *Eunectes murinus* (green anaconda).

The department originally accepted comments until May 11, 2010, but after numerous requests has reopened the comment period until **August 2, 2010**.

This reopening is particularly crucial for those who did not have time to express their views on this proposal during the first comment period.

**NOTE:** This PetAlert is based on information that can be found on PIJAC's blog on this issue at:

<http://actnow4constrictors.blogspot.com>

The blog provides detailed information on the proposal as well as suggestions on how to write comments and submit them to the Department.

The proposed rule is largely based on a "risk assessment" of the nine species of large constrictor snakes that was conducted by the US Geological Survey:

[http://www.fort.usgs.gov/Products/Publications/pub\\_abstract.asp?PubId=22691](http://www.fort.usgs.gov/Products/Publications/pub_abstract.asp?PubId=22691)

This 300+ page document has not been made available for public comment as part of the rule making process. However, aspects of it are summarized in the proposed rule.

Although the risk assessment has been endorsed by some invasive species biologists, it has also been strongly criticized by expert organizations and individuals who work with large constrictors on a regular basis (in the wild and/or in captivity).

**PIJAC's scientific and government affairs teams found numerous errors, inconsistencies, and biases in the study.** [Click here](#) to view a copy of the PIJAC review.

Other reviews consistent with PIJAC's analysis can be found below. These address not only the USGS risk assessment, but also a Burmese python "climate matching" paper that was previously published by the same USGS biologists.

<http://blogs.nationalgeographic.com/blogs/news/chiefeditor/2010/03/climate-matching-predictions-giant-snakes-exaggerated.html>

See "Recent VPI Publications" in the bottom right corner: <http://www.vpi.com/>

<http://www.usark.org/uploads/Congressional%20letter%20on%20HR%202811-S%20373.pdf>

**NOTE:** If you have the technical expertise to do so, we greatly encourage you to discuss the problems with the USGS risk assessment (and the statements derived from it that are included in the proposed rule) in detail when providing your comments to the USFWS on the proposed rule. The more "substantive" your comments, the more likely they are to be taken into consideration by the USFWS. For further guidance, please see our blog postings on "How to Respond."

### **Recommended Action:**

Your comments **MUST** be received by the USFWS on or postmarked August 2, 2010 to be considered. PIJAC would greatly appreciate receiving a copy of the comments that you submit. Please send them to [info@pijac.org](mailto:info@pijac.org) with the phrase "**Large Constrictor Comments**" in the subject line. Be sure to include your contact information and let us know if we have permission to post your comments as an example for others to reference.

Remember, for a detailed guide on submitting comments please refer to PIJAC's blog at:

<http://actnow4constrictors.blogspot.com>

If you have any further questions regarding this proposal please feel free to contact Marshall Meyers at [marshall@pijac.org](mailto:marshall@pijac.org) or 202-452-1525.