

**AUDUBON OF FLORIDA \* COLLIER COUNTY AUDUBON SOCIETY  
EVERGLADES FOUNDATION \* EVERGLADES LAW CENTER \* EVERGLADES TRUST  
FLORIDA WILDLIFE FEDERATION \* FRIENDS OF THE FLORIDA PANTHER REFUGE  
SANIBEL CAPTIVA AUDUBON SOCIETY \* SIERRA CLUB LOXAHATCHEE GROUP  
SIERRA CLUB MIAMI GROUP \* SOUTH FLORIDA AUDUBON SOCIETY**

May 11, 2010

Division of Policy and Directives Management  
U.S. Fish and Wildlife Service  
4401 N. Fairfax Drive  
Suite 222  
Arlington, VA 22203

**Re: Injurious Wildlife Species; Listing the Boa Constrictor, Four Python Species, and Four Anaconda Species as Injurious Reptiles: FWS-R9-FHC-2008-0015**

The undersigned organizations support the U.S. Fish and Wildlife Service's (FWS) Proposed Rule to amend its regulations to include the boa constrictor, four python species, and four anaconda species to the list of injurious wildlife under the Lacey Act. As organizations dedicated to conserving natural resources and wildlife in the State of Florida, we recognize the importance of a proactive, coordinated effort by the federal government to control importation and interstate transportation of these dangerous species.

In the Everglades ecosystem, Burmese pythons are already well established, and pose a significant threat to native, imperiled species. Monitoring has shown that state and federally threatened and endangered species, including the wood stork and Key Largo woodrat, are already being predated by these large constrictors. Because these species are cryptic, highly productive, and can take advantage of difficult-to-access aquatic habitats, eradication is difficult and expensive, and despite all our efforts, we may never truly eliminate Burmese pythons from South Florida's wildlands. Meaningful source control is the only effective means of protecting our natural areas from these species, stemming additional releases of Burmese pythons, and preventing the establishment of other large constrictors.

In addition to their ecological impacts, these species pose a significant financial burden to Florida. The cost of eradication efforts on public lands are borne by taxpayers, and to date, the State of Florida has not been able to appropriate sufficient funding for eradication or halting the spread of these species. Traditionally, state invasive exotic eradication funding has been directed at invasive plants, and even this funding has been reduced by as much as 70% in some agencies in recent years, due to diminished tax revenues. Additional public funds may be required to recover native species impacted by these invasive constrictors, and private landowners face long-term financial hardship if eradication and management measures become necessary on their own properties. FWS has recently funded a U.S. Geological Survey project to detect and control Burmese Pythons in order to protect the Key Largo woodrat pursuant to the Endangered Species Act, and similar programs may be required on a more widespread basis. The cost of the Service's inaction, if it fails to list these species as injurious under the Lacey Act, would be significant and ongoing to the State of Florida and its citizens.

Just this month, the Florida Legislature passed legislation banning the ownership, breeding and sale of these large constrictors, with reasonable provisions for current owners to retain their pets for the life of the snake, and allowing ownership by permitted researchers and zoological institutions. The Florida Fish and Wildlife Conservation Commission has begun to establish and implement rules to similar effect. While these efforts at the state level are critical, we recognize that they come far too late to address the issue of the Burmese python in Florida.

Florida's experience demonstrates that states would benefit from federal leadership on this issue to ensure injurious species are restricted in a timely way, before they become established. Similarly, injurious status will be an important companion protection to Florida's state rules, appropriately governing the federal realms of import and interstate commerce.

Thank you for your consideration of these comments.

(signatures waived to expedite delivery)

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