

**Audubon of Florida · 1000 Friends of Florida · Florida Wildlife Federation  
The Nature Conservancy · Everglades Foundation · Everglades Trust  
Humane Society of the United States · Friends of the Florida Panther Refuge  
National Parks Conservation Association · Collier County Audubon Society  
Audubon of Southwest Florida · Tropical Audubon Society · South Florida Audubon Society  
Sanibel-Captiva Audubon Society**

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September 13, 2011

Representative Darrell E. Issa, Chair  
US House Committee on Oversight and Government Reform

Re: Committee Hearing "How a Broken Process Leads to Flawed Regulations"

Dear Mr. Chairman:

We understand that in the course of your hearing tomorrow, "How a Broken Process Leads to Flawed Regulations," you will hear testimony from regulated interests on the "injurious" listing of wildlife under the Lacey Act. Our organizations strongly support the listing of boa constrictor, four python species and four anaconda species as "injurious" for the following reasons.

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 preyed upon by these large constrictors. Because these predatory snakes are cryptic, highly productive and can take advantage of difficult-to-access aquatic habitats, eradication is difficult and expensive. 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 the wild. Listing these species "injurious" under the Lacey Act is a proactive, coordinated effort by the federal government to control importation and interstate transport of these dangerous species.

In addition to their deleterious 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 to ensure eradication or even 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, 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. The US Fish and Wildlife Service (FWS) has already had to fund projects to detect and control Burmese pythons in order to protect endangered species pursuant to the Endangered Species Act; similar expenses may become necessary as these and other species spread. The cost of the FWS 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.

In aid of our state wildlife agency, the 2010 Florida Legislature passed legislation banning the ownership, breeding and sale of giant pythons, anacondas and Nile monitors as pets, with reasonable provisions for current owners to retain their pets for the life of the animals, and permitting possession for research or zoological institutions. 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 firmly 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 this important issue.

Respectfully,

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The Everglades Trust

Cc: Rep. Elijah Cummings, Ranking Member  
Rep. Dennis Ross, FL-12  
Rep. Connie Mack, FL-14  
Rep. John Mica, FL-07