

March 22, 2015

Mr. Sonke Mastrup
Executive Director
California Fish & Game Commission
1416 Ninth Street, Room 1320
Sacramento, CA 95814

Sent via email to fgc@fgc.ca.gov

Dear Mr. Mastrup,

I am writing in regards to Item 29: Update regarding proposed changes to bobcat trapping regulations (Pursuant to Section 4255, Fish and Game Code) proposed for discussion on April 7 and 8, 2015. Bobcats are important to California's economy both as a predator and as a part of our eco-tourism industry. I urge the Fish and Game Commission to recommend a moratorium on bobcat trapping in California, except where absolutely essential to protect endangered species.

I am a wildlife biologist and have worked across much of the state of California for the last 30+ years. There is limited recent peer-reviewed data available on population levels of bobcats in our state. I'm sure you will agree management of California's wildlife should be science-based. In my opinion, modern wildlife management should not usually include trapping of native predators; this is discussed below in more detail.

1. There do not seem to be recent peer-reviewed studies on bobcat population demographics in California.

A BIOSIS (search engine) search conducted at the University of California, Berkeley for literature from 1928-2015 revealed only a few California –based articles (including Hilty et al 2006 on Sonoma County), and these were mostly centered on southern California. A query the California Department of Fish and Wildlife (CDFW) website found harvest assessments, and several other studies conducted 30 years ago (Lembeck 1978 for San Diego County; Zedulak and Schwab 1981 for a small portion of Riverside County). Although harvest assessments provide some data, I noted in my literature review that other techniques (DNA analysis, use of camera stations, etc.) are used elsewhere in the U.S.

In the most recent harvest assessment, CDFW staff (Garcia and Ypema 2014, p.2) state that there are ongoing studies:

In order to determine the magnitude of the bobcat harvest and the effects on bobcat populations in the state, several studies were initiated. Field studies of local population dynamics were conducted on un-harvested populations in Siskiyou, Riverside and San Diego counties and on a harvested population in San

Diego County. Also, a statewide harvest monitoring program was initiated to determine the age, sex structure, and harvest of bobcats on a regional basis.

Due to time limitations, I did not systematically review each CDFW/CDFG annual report but I was surprised to read essentially the same language in Grenfell 2002. Where are the results of these studies and when were they conducted? Or does this refer to Lembeck 1978 and Zezulak and Schwab 1981?

2. Closure zones are too limited.

Although closure zones (Gardner 2015) would provide much better protection than the current regulations, protection by closure zone would be incomplete especially given that trappers are expert at using scents to lure bobcats into traps. It is evident from the draft map presented in Gardner 2015 that only part of the Mono Basin National Forest Scenic Area is proposed for closure, and all/most of the Mojave National Preserve is excluded. Trappers are expert at using scents to lure bobcats into traps. At minimum, there needs to be extensive buffers around all national parks, reserves, etc. to compensate for reduction in charismatic watchable wildlife.

3. Please adopt a state-wide moratorium or ban on bobcat trapping.

Reduction or removal of native predators, once a common practice, is now considered “a vestige of the outmoded mentality of western expansionism, in which the goal was to “tame” the wilderness, replacing the ecosystem’s primary-consumer trophic level entirely with domesticated herbivores and a few favored game species and all higher trophic levels with humans” (Robinson 2005 as cited in Bergstrom et al. 2014, p. 139).

Reducing (predator) populations, locally or globally, risks cascading negative consequences including impoverishment of biodiversity, loss of resilience to biotic invasions, destabilization of populations at lower trophic levels, and loss of many ecosystem services that benefit human society directly and indirectly (Bergstrom et al. 2014, p. 131).

Thank you kindly for consideration of my views,

Emilie Strauss



Literature cited.

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