



City of Santa Cruz Water Department – 212 Locust St Santa Cruz, CA 95060 – (831) 420-5200

January 29, 2015

California State Fish and Game Commission  
1416 Ninth Street, Room 1320  
Sacramento, CA 95814

RE: Bullfrog Policies

Dear Commissioners:

As you likely know, the invasive/non-native American bullfrog is a voracious predator, carrier of the deadly Chytrid fungus and outcompetes many of our native amphibians – several of which are considered “special-status” species under the state and federal Endangered Species Acts. For these very reasons, the City and County of Santa Cruz both enacted bans on importation and sales of live bullfrogs back in 2012 and have been advocating for more proactive state policies on this species since that time. The City of Santa Cruz Water Department is involved in this issue because we are a member of the “regulated community” under the Endangered Species Act and Fish and Game Code with regard to California red-legged frog (CRLF) and have a general desire to protect our native biodiversity. Understanding that bullfrogs are a direct threat to the recovery of the CRLF here in Santa Cruz County<sup>1</sup>, the only rational posture for us to take is to seek greater controls on the spread of this invasive species as part of our multi-faceted conservation strategy for CRLF.

Though there are admittedly some cultural considerations unique to them, American bullfrogs are similar to many of the other invasive species that the Commission has taken action on over the years. These include the African clawed frog, Cane toad, Coqui frog and many other non-native species which continually threaten California’s great biodiversity. We are encouraged that the Commission is taking up this issue again and are pleased with recent actions the Department has taken to tighten the permit process for bullfrog importation. During our discussions with other stakeholders about the bullfrog issue several means of making the current importation policies more rigorous have emerged. Among them are:

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<sup>1</sup> U.S. Fish and Wildlife Service. 2002. Recovery Plan for the California Red-legged Frog (*Rana aurora draytonii*). U.S. Fish and Wildlife Service, Portland, Oregon. viii + 173 pp.

- 1) Develop a fee structure for importation permits which would pay for the Department to develop a Chytrid screening process, feral bullfrog eradication programs and permit oversight/enforcement.
- 2) Prohibit distribution of live frogs infected with the Chytrid fungus to retailers from importers.
- 3) Periodically conduct evaluations of importer and retailer permit compliance and pursue enforcement as appropriate.

This issue is becoming increasingly untenable given the other significant threats which also impact the state's native amphibians face. Therefore we encourage you to take the most conservative approach possible in further regulating live bullfrog importation and sales; including an outright ban on the sale and importation of live American bullfrogs (similar to other invasive/non-native species like the African clawed frog). This ban should apply not only to the state's existing permit process, but also internet sales - which are currently unregulated.

Thank you for your consideration of our comments. Should you have any questions or concerns about them, please do not hesitate to contact me at the (831) 420-5483 or [cberry@cityofsantacruz.com](mailto:cberry@cityofsantacruz.com)

Sincerely,

Chris Berry,  
Watershed Manager  
City of Santa Cruz Water Department

Cc: Resources Secretary Laird, Director Bonham, Stafford Lehr, Kristen Kittleson, Lena Chang, Kerry Kriger