

MBCA



morongo basin conservation association

June 8, 2015

CA Fish and Game Commission
Sonke Mastrup, Executive Director
1416 Ninth Street, Room 1320
Sacramento, CA 95814

Submitted Via EMAIL to fgc@fgc.ca.gov with copy by mail

RE: Support for Option 2: Complete statewide ban on commercial trapping of bobcats to implement The Bobcat Protection Act AB 1213.

Dear Executive Director Mastrup;

Thank you for this additional opportunity to comment on the implementation of the Bobcat Protection Act AB 1213. The MBCA have been educating Morongo Basin residents about issues affecting our environmental and economic health since our incorporation in 1969. MBCA is the oldest collective voice for educating the Morongo Basin's citizens about the unique, natural qualities of which they are stewards, and what is needed to preserve those features.

Bobcats are a unique predator of small animals and a necessary and important component of desert ecology. The Morongo Basin area links the wildlands of Joshua Tree National Park to the wildlands of the Marine Corp Air Combat Center and is in an ecological transition zone between the Mojave and Sonoran (Colorado) Desert. It is also home to the aware citizens that banded together to initiate and applaud the successful passage of the Bobcat Protection Act of 2013.

Wildlife Connectivity in the Morongo Basin

In 2008 the South Coast Wildlands issued *A Linkage Design for the Joshua Tree – Twentynine Palms Connection*.¹ From this study and report we learned the importance of the bobcat population to both the diversity and functioning of our regional ecology and to the missions of Joshua Tree National Park and the Marine Corp Air Ground Combat Center. The bobcat is one of the seven mammal focal species chosen because it is an

“excellent species to evaluate functional habitat connectivity at the landscape level because they are an area-dependent species that is sensitive to habitat fragmentation. Research has shown that there is a lower probability of finding bobcats in smaller and more isolated habitat patches...Bobcats are more sensitive to disturbance than coyotes and mesopredators (i.e., smaller carnivores like native raccoon and skunks and exotic species like opossum that prey on birds and other smaller vertebrates)...Bobcats may utilize a wide range of habitats, including coastal and desert scrub, chaparral, sagebrush, oak woodlands, and forests. Within these habitats they make use of cavities in rocky outcrops, logs, snags,

¹ www.scwildlands.org

and stumps, and dense brush for cover, and to site their dens. They show a marked preference for expansive natural areas with steep and rocky terrain. "(Page 14, italics for emphasis)

Wildlife Connectivity Statewide

In 2010, South Coast Wildlands prepared for the California Department of Fish and Wildlife and the California Department of Transportation the *California Essential Habitat Connectivity Project: A Strategy for Conserving a Connected California*.² This document supports the CDFW Essential Habitat Connectivity program³ that is a tool in the California's State Wildlife Action Plan 2015 (SWAP). For your convenience, the following three paragraphs are copied from the CDFW website

<https://www.wildlife.ca.gov/Conservation/Planning/Connectivity>

Why Connectivity Is Important

A functional network of connected habitats is essential to the continued existence of California's diverse species and natural communities in the face of both human land use and climate change. Habitat is key to the conservation of fish and wildlife. Terrestrial species must navigate a habitat landscape that meets their needs for breeding, feeding and shelter. Natural and semi-natural components of the landscape must be large enough and connected enough to meet the needs of all species that use them. As habitat conditions change in the face of climate change, some species ranges are already shifting and wildlife must be provided greater opportunities for movement, migration, and changes in distribution. In addition, aquatic connectivity is critical for anadromous fish like salmon that encounter many potential barriers as they return upstream to their places of origin.

Strategy

Protect connectivity while habitat is still intact, through permanent conservation and adaptive management

California Essential Habitat Connectivity Project (CEHCP)

More than 60 federal, tribal, state and local agencies contributed to the California Essential Habitat Connectivity Project,⁴ a statewide assessment of large, intact blocks of natural habitat and a "least-cost" modeling of connections between them. Agencies use this statewide map and model to collectively build coarse-scale networks of conserved lands.

The Problems with Bobcat Trapping are unknown

There is no question that the bobcat, our only predator of small animals in its size range, is an essential component of functioning ecosystems statewide. The results of trapping in the community of Joshua Tree is a good example of how trapping can devastate a local bobcat population. The dynamics of repopulation in this area is unknown as are the outcomes of the bobcat's steep decline. There is no research underway to answer these questions.

Bobcats are Natural Capital

Bobcats perform a free service to land owners, businesses, and communities by preying on rodent populations that might otherwise cause health or financial problems. Example: Google tells us that the average cost to eliminate rodents and close off entry is from \$300 to \$500.

² Ibid.

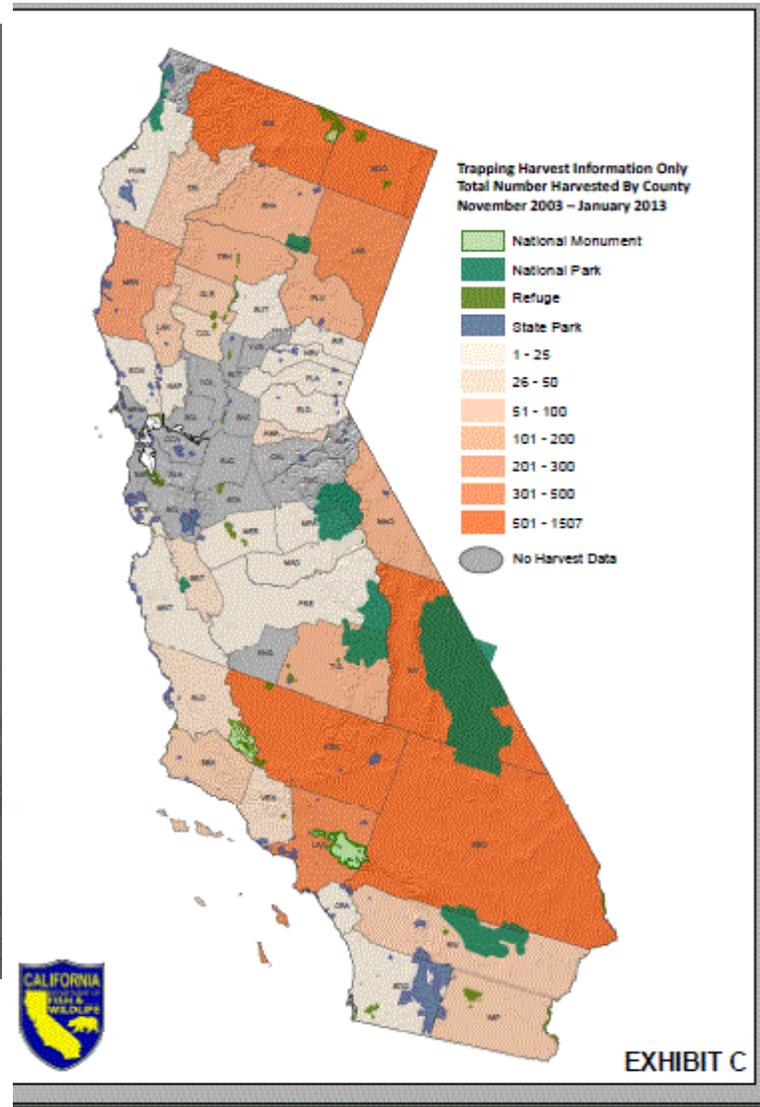
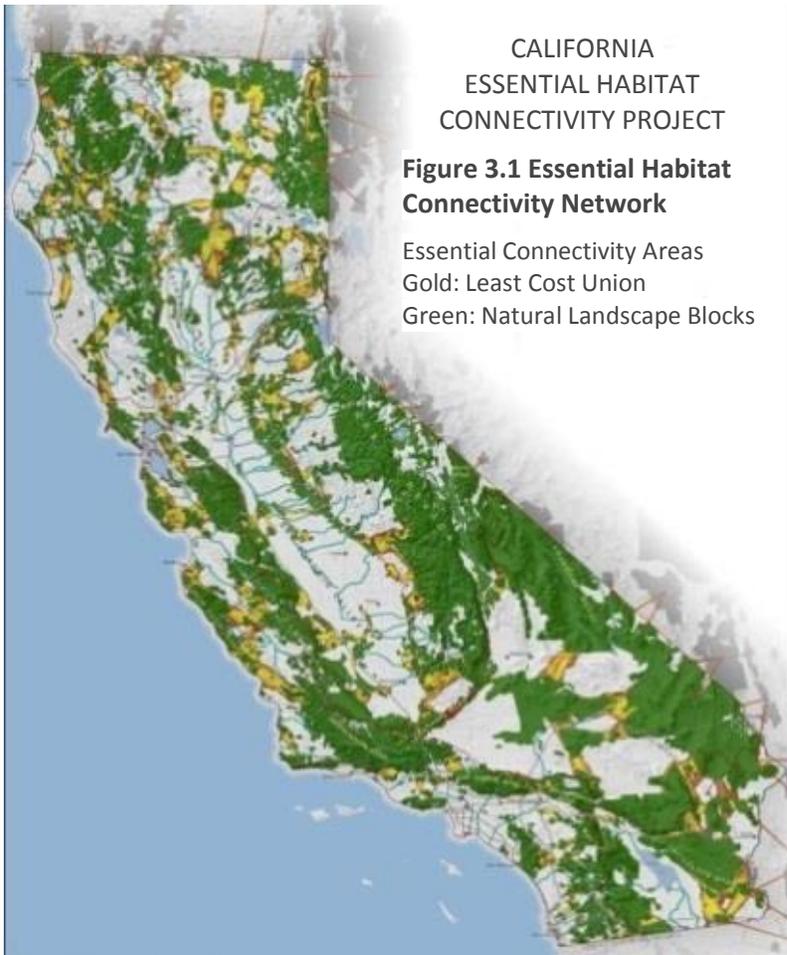
³ <https://www.wildlife.ca.gov/Conservation/Planning/Connectivity>

⁴ Ibid.

Check the Maps

The Essential Habitat Connectivity Network map (below left) is adjacent to the map showing the total number of bobcat harvested by county from 2003 to 2013. The highest numbers of bobcats were harvested in the least populated areas in the north and south. When constructing the CEHCP seven representative focal species were chosen including the bobcat. Of the 388 species-specific corridors linking the Natural Landscape Blocks, 120 least-cost corridors were analyzed for bobcat⁵. Healthy bobcat populations are important to the goals of the CDFW

Comparison of the California Natural Landscape Blocks (Green) and Least-Cost Unions (Gold) with the counties showing the highest bobcat harvest from November 2003 – January 2013 (Exhibit C)

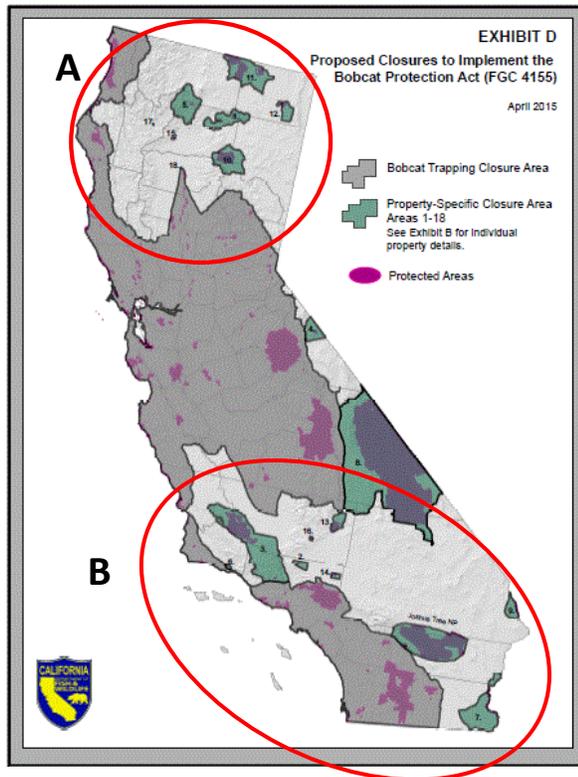


⁵ Ibid. Page 85

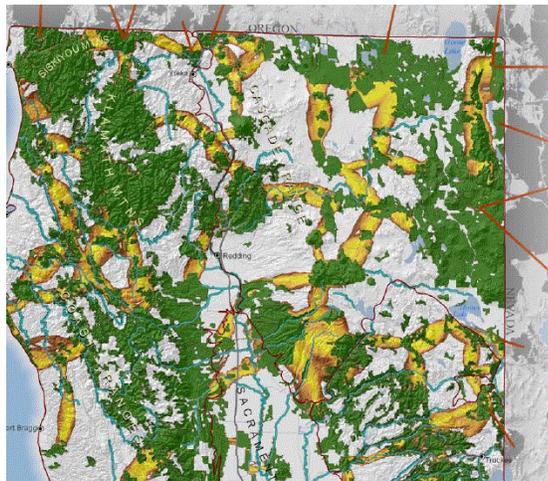
The CDFW has not yet studied the natural bobcat populations found throughout the state although they account for their presence when evaluating connectivity between natural landscape blocks. Until the field studies providing population numbers are performed the best wildlife management practice is Option 2: Complete statewide ban on commercial trapping of bobcats. But,

Option 1: permit commercial bobcat trapping in areas with high density bobcat populations.

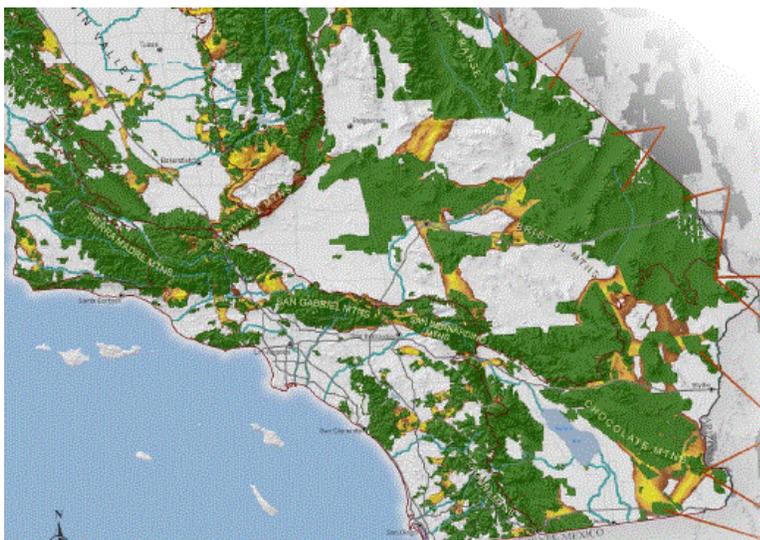
If Option 1 is chosen please consider the following:



A. Protected islands of habitat are just what the CEHCP wants to avoid. In the Klamath Mountains, Cascade Range, and the Modoc Plateau areas of northern California, Option 1 isolates (Specific Closures) 1 National Park, 2 National Wildlife Refuges, and 5 State Parks – all with missions to protect their resources for the benefit of present and future generations.



Trapping would impact all the linkages originating from the coast to the east across the Modoc Plateau.



B. The bobcat open trapping area contains Natural Landscape Blocks (green) and Least-Cost Linkages (gold) that feed into and out of the Mojave National Preserve, the Marine Corp Air Ground Combat Center, and Fort Irwin. It creates islands of Joshua Tree NP and the southern half of Death Valley NP, the Imperial and Havasu NWRs, and 6 State Parks including Red Rock Canyon.

C. Not visible on these maps are the thousands of parcels of private property, many of them checker boarded by BLM land. Trappers must obtain and carry permission from land owners prior to setting traps.

If Option 1 is selected than the following should be mandatory:

- Agencies/managers of all Specific Closed Areas (SCA) must be notified that their boundaries are vulnerable to commercial bobcat trapping.
- All SCAs must be made aware that mitigation and management measures based on the CEHCP are overridden by the commercial trapping season and regulations. It would be fair to allocate a percentage of the Bobcat Validation Fee (\$1100) to offset incurred agency costs such as enhanced ranger patrol during the trapping season.
- Land owners in the Open Areas live surrounded by natural vegetation used to hide bobcat traps. All landowners should be notified by mail of the commercial trapping season in their area so that they can be alert. Many of the bobcats in the Joshua Tree area were trapped without landowner knowledge or permission and the trapping was unacceptable to them.
- It would be appropriate for the land owner to be compensated a % of the pelt price to offset the loss of the free services provided by the bobcat. For the 2013-14 year there were 1,292 bobcat trapped and the average per pelt was \$390 for a total of \$503,880. All else equal, each or the 93 trappers would get \$5,418. But some trappers are better than others and one legal trapper in the Joshua Tree area took 46 animals for a profit of \$17,940. In this instance payment for psychological trauma would have been warranted. However, payment, in part, became the Bob Protection Act, AB1213.
- There must be a limit on commercial bobcat take per area so as not to devastate an area (see above). However, that limit can't be decided until the number of bobcat is known with the number arrived at based on sound scientific practices. The conclusion here is obvious.
- The proposed costs to the commercial trapper: 1) \$120 – Basic License Fee, 2) \$1100 – Bobcat validation fee, and 3) \$35/pelt should be raised to cover the costs of the mandatory research on bobcat populations and the need for addition wardens in Open Areas. The assumption that there would be 200 commercial trappers when the new regulations take place is not backed by the numbers. The 2013-2014 year saw an increase of 13 commercial trappers (80 to 93) and now a jump by 107 to 200 commercial trappers is anticipated. Granted that the price of pelts went up but this increase implies a stampede from outside the state. Or, the anticipated number will not be reached, in which case, the tax payers will foot the research bill. That would not be acceptable.

We don't think your decision is a tough one. Given the pressures on wildlife and their habitats from population growth, recreation, climate change and drought, we believe your prudent decision will acknowledge the conservation goals as outlined in California's State Wildlife Action Plan 2015 and the Essential Habitat Connectivity Project.

Thank you for this opportunity to comment.

Sincerely,



Pat Flanagan
Board Member, Morongo Basin Conservation Association
Member, Morongo Basin Municipal Advisory Council