July 16, 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
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 again for this opportunity to comment prior to the Commission’s final ruling on the Bobcat Protection Act. Please refer to the MBCA comments dated June 7, 2015 for our concerns on landscape fragmentation, wildlife linkages, biodiversity, and the long range effects of climate change.

**The ecological role of the bobcat**

The bobcat is regulated both for its ecological role and as a furbearing mammal. Throughout this rule making process it has been claimed that there are plenty of bobcats so trapping is not a problem for the species. No one suggests that the species is in trouble. Our concern is with bobcat populations and their function in different ecosystems statewide. Bobcat populations are supported by their prey base. Bobcat - prey population dynamics tell ecosystem stories; the details of which are known only in general.

Bobcats are considered a ‘keystone species’, meaning they have a disproportionate effect on the ecosystem they live in relative to their biomass. Even though their populations are relatively sparse their predatory style exerts considerable influence on lower levels of the food chain. This is true of predators in general. The Desert Food Pyramid below shows representative forms, styles, and functions of different predators. It is obvious one form does not stand in for another; each is unique in its own way. The loss of one form will affect all levels of the system in numerous ways.

Bobcats are at or near the top of the food chain and exert what is known as ‘top-down control’ of the ecosystem. Generally speaking if the ecosystem becomes short on predators then populations of consumers lower in the food chain rapidly increase in size. Numerous ecological studies have demonstrated that the loss of top-down control leads to an increase in herbivores, which leads to diminished food resources (overgrazing of the producer plant communities) causing a decline in the
condition of individuals (higher rates of starvation, lower birth rates) resulting in a higher mortality in consumer populations at all levels. This in turn affects invertebrate communities which drive nutrient cycling. You can follow energy cycling through the Desert Food Pyramid. This illustration shows the “Rule of 10” where each higher level of consumers receives only ten percent of the energy captured by the next lower level.

California Department of Fish and Wildlife has no estimates of bobcat populations within local ecosystems other than annual trapping and hunting data. This data does not provide reliable population estimates or information about the ecosystems where the bobcats were living. Simply put, the natural
fluctuations of predator and prey populations is weather dependent. Predator numbers wax when prey is abundant (lots of forage) and wane when prey become scarce (less forage). Predator numbers are usually a breeding season behind their increasing food supply. We are unaware of what has happened to bobcat populations throughout the state during this multi-year drought. Meddling with nature, selection of Option 1, would add additional and unpredictable stresses to the system, likely influencing the resiliency of the system to adapt to change.

To rule for the bobcat as a furbearing game animal rather than as a keystone species, the Commission assumes the role of the top-down controller of the food pyramid. This particular keystone location is outside the system (see illustration) yet has the power to influence the lower ecosystem levels with unknown consequences. Since no one is looking (measuring at all ecosystem levels), the consequences will remain unknown.

Option 1

Should the Commission choose Option 1 and permit commercial bobcat trapping in areas with high density bobcat populations (Map 1), we ask that you honor the will of the people and the U.S. Congress. Please add to the list of areas with buffer zones (bobcat trapping is not permitted) the 77 BLM Wilderness Areas, statutory BLM Wilderness Study Areas, and the Mojave National Preserve (Map 2).
These areas are within the California Desert Protection Act of 1994. They were set aside to (A) preserve unrivaled scenic, geologic, and wildlife values associated with these unique natural landscapes: (B) perpetuate in their natural state significant and diverse ecosystems of the California Desert.

Since Option 1 focuses attention on the productive harvest areas we were going to ask that the CDFW work with the BLM, NPS, NFS, and State Parks to ensure that affective management/enforcement strategies and funding mechanisms be in place to protect these and the already listed public and private conservation lands from poaching. However, a search of websites focusing on ‘how to trap’ furbearing animals shows how hopeless law enforcement efforts would be under the current (or anticipated) capacity of the affected agencies. This is especially true if pelt prices continues to climb.

“I have a few serious bobcat trapping friends who routinely catch nearly a 100 bobcats a year without cracking the lid on a single bait jar. These trappers simply place blind sets (above ground) in trails along narrow ravines where bobcats effortlessly use these areas as travel corridors.” The trappers also comment that they catch a good number of lesser priced coyotes and foxes in these exact locations.1 (My bold for emphasis.)

The Google Earth image of the Sheep Hole Mountains Wilderness Area (right) shows countless narrow ravines, each one a possible trapping area for bobcats and other furbearing animals.2

The California locations with the greatest bobcat trapping success are within the Basin and Range Geologic Province. In California there are about a hundred isolated ranges, like the Sheep Hole Mountains, with complex terrains of canyons, washes, and ravines – bobcat roadways – draining precipitation from the ridges to the playas. Many of these ranges are designated wilderness. It would take a brigade to enforce trapping regulations

You have sufficient reason, given the minimal law enforcement capacity within the affected agencies, to choose Option 2.

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1 See more at: http://www.trapperpredatorcaller.com/article-index/is-the-set-location-or-the-bait-more-important-in-trapping#sthash.ZiFnbGtL.dpuf

2 The Sheep Hole Mountains Wilderness Area is both isolated and accessible. It is a half hours drive northeast of Twentynine Palms and directly east of the Cleghorn Lakes Wilderness Area. A Linkage Design for the Joshua Tree – Twentynine Palms Connection (SC Wildlands 2008) shows the two mountain ranges within the eastern least cost union connecting Joshua Tree National Park with the Marine Base.
When choosing Option 2 we believe you make the prudent decision to acknowledge the bobcat’s ecological role as a keystone species.

Thank you for the time you have given to consider these comments.

Sincerely

[Signature]

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