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IOWA CHAPTER

May 12, 2013

Iowa Department of Natural Resources
Wildlife Bureau Chief
Wallace State Office Building
502 E 9th St
Des Moines, IA 50319
Via E-mail wildlife@dnr.iowa.gov

Re: Furbearer Season, River Otter, and Bobcat Notice of Intended Action

Dear Dr. Garner:

The Iowa Chapter of the Sierra Club has approximately 5000 members who live in Iowa. Our mission is to preserve, protect, and enjoy the natural environment. On behalf of our members, the Iowa Chapter offers the following comments about the proposed harvest seasons for otters and bobcats.

In order to assess the proposed changes to the otter and bobcat season, the Iowa Chapter requested the following information from the Wildlife Bureau:

1. Describe the methods and procedures used by the DNR to count the number of bobcats and river otters in Iowa
2. How much have the populations of bobcats and river otters increased or decreased in each county in Iowa for every year since hunting and trapping of the animals began or for whatever time period is available
3. Provide the scientific basis and the methodology and procedure for determining what is a sustainable population of bobcats and river otters in Iowa
4. At what point do you determine that hunting and trapping has created a situation where the population of bobcats and river otters is no longer sustainable
5. Will any efforts be made on an emergency basis to close a season if the population of the animals is reaching the level where the species are endangered or threatened
6. How many animals will be killed now that the DNR is offering open season on bobcats and river others for the express purpose of economic development
7. How many bobcats and river otters have been killed by hunters and trappers each year since hunting and trapping of the species was allowed.

In response to our request, Vince Evelsizer, Department of Natural Resources Furbearer and Wetland Biologist, met with several representatives from the Iowa Chapter. The representatives of Sierra Club asked Mr. Evelsizer for the answers to the questions, including the data used to make the decisions. It was obvious, after talking with Mr. Evelsizer, that there was no scientific basis nor reliable data to support the decision to expand the seasons and quotas on the otters and bobcats.

Bobcat

The Iowa Chapter is extremely concerned that the harvesting of bobcat under the proposed rules will result in so many animals taken that the population will not be sustainable. Having been extirpated from Iowa, the bobcat re-populated Iowa from neighboring states (Missouri, Nebraska, Kansas). The population is still expanding and dispersing across the state. The Chapter does not want to see this population exterminated a second time.

Although the bobcat has extended its range, there appear to be counties in the state where the bobcat has not fully populated the area, including east and northeast Iowa. North central Iowa and northwest Iowa are also not showing populations of bobcat. Increased harvesting pressure may stunt the expansion of the bobcat into those areas. If there is an over-harvest, the bobcat population may have difficulty compensating and sustaining its population.

Mr. Evelsizer indicated that in 2007 to 2008 the DNR estimated that Iowa had 2800 to 3500 bobcat and predicted the bobcat population was growing at 8.5 percent a year. After running estimates of the population growth each year and the number of animals that are harvested or die from other causes, Mr. Evelsizer felt that the population could sustain an expected harvest of 800 animals. Last year the harvest was 530 animals with 119 incidental captures, for a total of 649 animals. Mr. Evelsizer was predicting that the number of animals taken would increase by 23 percent.

Dr William Clark, Iowa State University ecology professor and expert on the Iowa bobcat, was interviewed on the Iowa Public Radio show Talk of Iowa on April 10, 2013.¹ He indicated that he would estimate that the current population of bobcat is 2000 to 2500, perhaps up to 3000, but not much more.²

The Chapter is aware that the prices offered for pelts have significantly increased. With that comes increased interest in harvesting species like the bobcat. The number of trappers has increased significantly, from 11,000 in 2007 to 19,000 in 2012. Projecting that implies that an increased number of trappers will be attempting to capture a bobcat, more likely increasing the number of

¹ The interview can be found at <http://iowapublicradio.org/post/bobcats-are-back>

² This can be found around 20 minutes into the Talk of Iowa interview with Dr. Clark.

bobcats actually caught. Combine that with an open season in roughly the lower third of the state, a longer season, and no set quotas like all previous seasons, even with a bag limit of 1 bobcat per person, it is quite probable that a significantly greater number of bobcat will be harvested this year. Last year the season closed after 4 weeks; this year the season is proposed to be 8 to 9 weeks longer. The question becomes "is the level of harvest consistent with sustaining the population?"

The Chapter is extremely concerned that the harvesters may take more bobcat than the population can sustain. The studies conducted by Iowa State University on the bobcat in Iowa were completed 5 years ago. The Iowa Chapter is aware that the bow hunter survey counts bobcat, but is convinced that those counts are not accurate. Given no recent Iowa-based scientific study, the Iowa Chapter does not believe that an open season without quotas is reasonable. The Chapter is also aware that the Department of Natural Resources has no management plan for the bobcat.

Furthermore if more animals are taken than predicted, there will be absolutely no way to close the season as the harvest is written in the notice of intended action.

Dr. Clark indicated on Talk of Iowa that it is unknown what the result will be without the quota and that the quota may need to be put back in place if the harvest is out of hand.³ Dr. Clark indicated that removing the quota would slow the growth of the bobcat population and would slow the spread of the bobcat into other areas of the state.

The Iowa Chapter understands that the fur of the bobcat is better quality once the weather becomes colder. Given that Iowa winters generally are not cold enough to produce the high-quality fur until December or January, it appears that the season starts too early.

Additionally there has been an increase in the population of coyote, predators of the bobcat. More predators will tend to decrease the number of bobcat. With that in mind, an unlimited season is not sustainable.

The number of incidental killings of bobcat have been a fairly consistent range of 85 to 100 animals over the last 6 years. However the trend of the incidental takings over the last 6 years has not consistently increased enough to predict a significant increase in the population of bobcats. That would indicate that the bobcat could sustain a quota of 800, but it appears that the population is not growing so rapidly that it could sustain a significantly larger harvest, certainly not an unlimited harvest.

In conclusion, the Chapter supports

- delaying the opening of the season until December 1 so that harvesters can take advantage of better quality pelts

³ This can be found around 22 minutes into the Talk of Iowa interview with Dr. Clark.

- setting a quota of 800 bobcat
- developing a management plan for the bobcat
- funding continued scientific studies on the bobcat population and
- using the money the DNR earns from selling the pelts from incidental kills to fund the scientific studies

Without a management plan and without the scientific studies, the Iowa Chapter believes that the Department of Natural Resources is unable to set an extended open season on the bobcat without quotas.

River Otters

Having been extirpated from Iowa, with the possible exception of northeast Iowa, the otter was re-introduced to Iowa in 1985. It appears that the introduction has been very successful and that the otter has spread across the state, particularly along the major rivers. Given few natural predators, the population has been successful in increasing the population size. When representatives of the Iowa Chapter attended public hearings when the first season was proposed in 2006, some members of the public were predicting dire consequences if the population of otters was not significantly reduced, including loss of native fish and destruction of fish at the state fish hatcheries. According to Mr. Evelsizer, neither of those two things have occurred as the population of otters has increased.

Mr. Evelsizer indicated that in 2007 to 2008 the DNR estimated that Iowa had 7000 river otter and currently has 12,000 to 14,000 river otter. After running estimates of the population growth each year and the number of animals that are harvested or die from other causes, Mr. Evelsizer felt that the population could sustain an expected harvest of 1,500 animals. Last year the harvest was 850 animals with 89 incidental captures, for a total of 939 animals. Mr. Evelsizer was predicting that the number of animals taken would almost double from last year's quota.

The Iowa Chapter is aware that the prices offered for pelts have significantly increased. With that comes increased interest in harvesting species like the otter. The number of trappers has increased significantly, from 11,000 in 2007 to 19,000 in 2012. Projecting that implies that an increased number of trappers will be attempting to capture an otter, more likely increasing the number of otters actually caught. Combine that with an open season, a longer season, no set quotas like all previous seasons, and a bag limit of 2 otter per person, it is quite probable that a significantly greater number of otters will be harvested this year. The questions become "is the level of harvest consistent with sustaining the population" and "can the population sustain a harvest of more than 1,500 animals?" If you look at the following chart, the quotas plus the reported incidental taking has been low enough to allow the population to increase and to continue to disperse across the state.

| Year | Quota | Reported incidental taking after the season | Total taken |
|------|-------|---|-------------|
|------|-------|---|-------------|

| | | | |
|------|-----|---|-----|
| | | closed or after the limit was caught, extrapolated from graph provided by Vince Evelsizer | |
| 2009 | 500 | 85 | 585 |
| 2010 | 500 | 61 | 561 |
| 2011 | 650 | 48 | 698 |
| 2012 | 850 | 89 | 939 |

The overall trend in incidental takings has been downward, except for the last year. There is no assurance of an upward trend of incidental takings until there are additional years of experience. The logical conclusion is that the population can not sustain an unlimited harvest season.

The Iowa Chapter understands that the fur of the otter is better quality once the weather becomes colder and that the fur becomes poorer in quality due to singeing and wearing toward the end of the winter. Given that Iowa winters generally are not cold enough to produce the high-quality fur until December or January, it appears that the season starts too early. And it is highly probable that there will be significant harvest of river otter in late December and early January. Last year the season closed after 21 days. By lengthening the trapping season an extra 9 to 10 weeks, it is quite probable that the numbers that are harvested will expand 2 to 3 times, to 1800 to 2700 animals, far beyond the 1,500 animals that Mr. Evelsizer predicted.

The Chapter is extremely concerned that the trappers may take more otters than the population can sustain. Clearly the Sierra Club does not want to see the otter extirpated from the state a second time. Yet The Chapter is not aware of any studies that have looked at the otter population in Iowa and what is necessary to maintain a sustainable population. The Iowa Chapter is aware that the bow hunter survey counts otters, but more than likely undercounts the otter. Without an Iowa-based scientific study, the Chapter does not believe that an open season without quotas is reasonable. The Chapter is also aware that the Department of Natural Resources has no management plan for the otter.

In conclusion, the Chapter supports

- delaying the opening of the season until December 1 so harvesters can take advantage of better quality pelts
- setting a quota of 1,500 river otter
- developing a management plan for the river otter
- funding scientific studies on the otter population and
- using the money the DNR earns from selling the pelts from incidental kills to fund the scientific studies

Without a management plan and without the scientific studies, the Chapter believes that the Department of Natural Resources is unable to set an extended open season on the otter without quotas.

Other Furbearer Comments

The Iowa Chapter is concerned about the crashing population of gray fox. Because little has been done to study the causes or to evaluate the state of gray fox habitat, the Chapter supports funding a scientific study that evaluates the gray fox's decline.

Aside from ducks and geese, the other species that are hunted and trapped in Iowa have not been extensively studied with respect to maintaining sustainable populations, evaluating current habitat and what needs to be done to improve habitat, and the effects of changing weather patterns on the population. The Chapter recommends funding those studies so that those populations are not extirpated and also funding the development of management plans for the species.

The notice of intended action mentions that changing the harvesting season, quotas, and bag limits for the river otter and bobcat will have positive affects on private sector businesses. The Chapter hopes that the furbearer season is not predicated on the growth of the international fur market prices, with more animals slated for harvest when the pelt prices are highest. The Chapter is also concerned with efforts to treat the hunting and trapping of wild animals as economic development, which could lead to over-harvesting. Many Iowans enjoy wildlife watching and photography, in addition to or instead of hunting and trapping; over-harvesting affects their enjoyment of the natural world.

Conclusion

After reviewing all of the information that the Chapter has found and been provided, including our discussion with Vince Evelsizer, the Chapter is convinced that there is no scientific basis or reliable data to justify expanding the season and eliminating any quotas for harvesting bobcats and otters. The Iowa Chapter wants to remind the Natural Resource Commission that Section 481A.39 of the Iowa Code requires you to base your decision "in accordance with sound fish and wildlife management principles."

Sincerely,

/s/Wallace L. Taylor

Wallace L. Taylor
Legal Chair