



## COALITION TO PROTECT INDIANA'S BOBCATS

March 21, 2018

Indiana Natural Resources Commission  
 Division of Hearings  
 Indiana Government Center North  
 100 North Senate Avenue, Room N103  
 Indianapolis, Indiana 46204-2200

**Re: Opposition to the proposed rule to open a hunting and trapping season on Indiana's bobcats**

Dear Commissioners:

The undersigned organizations strongly object to the Indiana Department of Natural Resources' (IDNR's) proposed rule 312 IAC 9-3-18.1 to open a bobcat trapping and hunting season for the first time in nearly 50 years. Indiana's bobcats were trapped and hunted to the brink of extinction until they were finally granted protection on the state's endangered species list in 1969. This protection has prevented extinction, but bobcats could once again become imperiled if trophy hunting and trapping for recreational and commercial purposes is permitted.

The potential harm that a return to hunting and trapping would have on the bobcat population, as well as other wildlife, has not been adequately studied and the proposed hunting and trapping season could undermine the recovery of the species. Indeed, based on existing research, it is not known if the current population can sustain such take and more studies are warranted to obtain this information. Consequently, instead of allowing the persecution of such a rare species, which is short-sighted and biologically and morally problematic, more must be done to protect and conserve Indiana's bobcats.

Furthermore, there is no need for a hunting or trapping season. According to the IDNR's own information, although bobcat populations are slowly recovering, there are no verified accounts of bobcats preying on pets and conflicts with livestock are rare. Conversely, having a healthy and growing bobcat population on the landscape helps restore ecological integrity and balance to Indiana's wild, natural places. Bobcats, despite their secretive behaviors, may also stimulate additional growth in Indiana's wildlife watching industry, which, in 2011, generated over 751 million dollars in expenditures in Indiana.<sup>1</sup>

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<sup>1</sup> See U.S. Department of the Interior, U.S. Fish and Wildlife Service, and U.S. Department of Commerce, U.S. Census Bureau. 2011 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation.

If this proposal passes, bobcats would also be subjected to unacceptably cruel practices, including trapping and hounding. Steel-jawed leghold traps are commonly used to trap “furbearers,” and bobcats caught in these traps would be left to languish in pain and duress for hours and in freezing temperatures until killed by the trapper. A number of studies have been conducted to investigate the hazards of trapping on animal welfare. These studies measure the frequency and severity of injuries to trapped animals, physiological stress responses of trapped animals, and signs of pain such as tissue swelling and behavioral responses. Research shows that the leghold trap can tear flesh, cut tendons and ligaments, cause tissue swelling and damage, and break bones and teeth as animals struggle to free themselves. Some trapped animals may chew off or twist off a limb caught in the trap in an effort to escape.<sup>2</sup> In fact, in one study, bobcats that were captured with leghold traps and released with apparently minor foot or leg injuries were later found with missing toes or feet on the captured limb.<sup>3</sup> Given such potential injuries, every reputable animal welfare and veterinary organization – from the American Veterinary Medical Association to the American Animal Hospital Association – has declared the steel-jawed leghold trap to be “inhumane”<sup>4</sup> and over 100 countries worldwide have prohibited its use.

In addition to these potential injuries, trappers often use brutal methods to kill trapped animals. Such animals may be shot at point-blank range, but are more often killed by strangulation, clubbing, and drowning so as not to damage the pelt. Traps set for bobcats may also capture non-target animals who can die or experience extreme suffering in such cruel traps.

Hunting bobcats can also cause tremendous suffering. Using a pack of radio-collared hounds to chase a bobcat is unsporting and dangerous for the dogs and winter-stressed wildlife, including ungulates, in the area. The dogs chase the bobcat until he or she is exhausted at which time the bobcat will seek refuge in a tree or on a rock face only to be shot at close range. If dogs catch the bobcat on the ground, the bobcat can be mauled to death which can also cause injury to the dogs. If a female bobcat with dependent young is pursued and killed, the dogs could maul and kill the kittens or they could die a prolonged death as orphans. Hounds also trespass onto lands where they are not permitted, including private property.

The hunting or trapping of bobcats is also unnecessary. They aren’t killed for their meat, their biology and ecology prevents over-population, they are not known to depredate pets, and conflicts with livestock are rare and can be easily and effectively prevented using non-lethal strategies. Instead, bobcats are killed solely to sell their pelts to overseas markets for personal gain.<sup>5</sup> Therefore, permitting the hunting and trapping of bobcats commercializes the species, facilitating private profiteering from the public’s wildlife, and depriving a far larger public constituency from experiencing these animals in the wild. Indiana’s wildlife belongs to all of its citizens, and should be able to be enjoyed by all – not exploited for overseas markets.

Notably, bobcats are designated as an Appendix II species under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). In order for their parts and products to be exported, it must first be determined that the export will not be detrimental to the species survival in the wild. At present, the legality of the federal government’s program that allows the export of pelts from Appendix II species, including bobcats, is being challenged in court due to the government’s failure to fully evaluate the environmental impacts of the program. Such impacts include whether state and provincial bobcat hunting and trapping programs are sustainable and what impact they have on non-target species, including threatened and endangered species. Due to excessive take, habitat loss and degradation, and other anthropogenic factors, there is evidence that some bobcat populations are declining. In addition, few states, including Indiana, or provinces have scientifically credible bobcat population estimates or reliable population trend data; information that is essential for assessing the impact of hunting and trapping on bobcat populations.

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<sup>2</sup> S. Harris, C. D. Soulsbury, and G. Iossa, "Trapped by Bad Science: The Myths Behind the International Humane Trapping Standards: A Scientific Review," *International Fund for Animal Welfare*, (2005); G. Iossa, C. D. Soulsbury, and S. Harris, "Mammal Trapping: A Review of Animal Welfare Standards of Killing and Restraining Traps," *Animal Welfare* 16, no. 3 (2007).

<sup>3</sup> Robinson, W.B. and Grand, E.F. 1958. Comparative movements of bobcats and coyotes as disclosed by tagging. *Journal of Wildlife Management*, 22(2): 117 – 122.

<sup>4</sup> See “House tightens grip on leghold trap,” *Journal of the American Veterinary Medical Association*, 203(5): 594.

<sup>5</sup> In 2014, for example, over 57,000 bobcat pelts were exported from the US to international fur markets.

There has also been massive public outcry against Indiana's proposal. In a review of the IDNR's "Got Input" form totals, comments against a bobcat hunt (469) outnumbered those in favor (106) by a margin of 4 to 1. A recent poll by Remington Research Group reveals that an overwhelming majority of Indiana voters in all parts of the state agree that the IDNR should do a comprehensive population count on bobcats before a bobcat hunting and trapping season is proposed. Specifically, the survey found that 80 percent of voters are concerned that the IDNR has no idea how many bobcats are in the state yet are proposing a hunting/trapping season, while only 15 percent do not see a need for a population count. The survey also found that 71 percent of those polled opposed allowing the use of hounds to chase bobcats into trees where they are killed (only 19 percent approved of using hounds) and 89 percent of those surveyed think the IDNR has a duty to listen to the will of Indiana's citizens (only 6 percent disagreed).

Bobcats are an iconic wildlife species critical to biological diversity and ecosystem function. They should be cherished in Indiana, rather than targeted for a trophy or pelt. **We respectfully urge you to reject this proposal and keep much-needed protections in place for bobcats.**

Sincerely,

Erin Huang, Indiana State Director  
**The Humane Society of the United States**

Barbara Hodges, DVM, MBA  
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