



**Board of Directors**

March 2, 2024

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**Chair**

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NYS DEC – Division of Fish and Wildlife  
625 Broadway  
Albany, New York 12233

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**Re: Public Comments on Draft 2024-2033 Management Plan for Bobcats in New York State**

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Dear Josh Stiller:

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Protect the Adirondacks has reviewed the Draft 2024-2033 Management Plan for Bobcat in New York (“Bobcat Plan”) proposed by the Department of Environmental Conservation (“DEC”). We offer this letter as public comments on the proposed Bobcat Plan.

Before this plan is finalized, we urge DEC to consider and cite the recent Cornell University wildlife population study that was funded by a DEC-administered grant. The Cornell University study found that “[d]espite recent recoveries elsewhere, bobcat populations in New York State displayed very low occupancy.” Twining *et al.*, *Landscape-scale population trends in the occurrence and abundance of wildlife populations using long term camera-trapping data*, Biological Conservation Volume 290 (February 2024) 110398, abstract.<sup>1</sup> Until DEC has a true understanding of bobcat populations in New York State, hunting and trapping of bobcats should be suspended.

**Staff**

**Background and Introduction**

Peter Bauer  
**Executive Director**

The Bobcat Plan is an update of the first bobcat plan that DEC completed in October 2012, which was called the Management Plan for Bobcat in New York State, 2012-2017. This current draft Bobcat Plan, while an update, is inadequate for the purpose of protecting the bobcat population in New York State.

Claudia K. Braymer, Esq.  
**Deputy Director**

Christopher Amato, Esq.  
**Conservation Director  
and Counsel**

We have many objections, but we focus here on two major issues. First, the draft Bobcat Plan is not based on reliable data that are necessary to meet

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<sup>1</sup> Available at <https://www.sciencedirect.com/science/article/abs/pii/S0006320723004998> (last accessed March 1, 2024).

DEC's statutory obligations of sound management of the wildlife resources of the State. ECL § 11-0303 Rather it is based primarily on subjective impressions and the harvest data of hunters and trappers that provide little scientific proof of objective findings. Second, DEC is attempting to make management decisions about hunting and trapping seasons of bobcats while at the same time setting the objective of determining the "status, distribution, and population trends of bobcats in New York" using "harvest-independent surveys to determine bobcat occupancy and abundance." Bobcat Plan pp. 33-34. It is deeply troubling to us that DEC would allow hunting and trapping, or any depletion of a species of unknown population, without a firm grasp, based on scientific research, of the long-term population and distribution trends of bobcats in New York.

Protect the Adirondacks urges DEC to employ the methods of modern wildlife ecology to scientifically study the bobcat population, find out how large and where the population is, its health and its role as a predator in the ecosystem and only then make a new bobcat management plan. Moreover, the draft Bobcat Plan is replete with boilerplate sections, repeating language in a cut-and-paste fashion from the earlier management plan.

While our focus is on the Adirondack Park, we have concerns about the DEC's estimates for the statewide population. In the Adirondacks, studies and DEC's furbearer's reports show bobcat sightings were the lowest in the state, yet DEC concludes the population is somehow robust. Neither the Adirondack bobcat population, nor the statewide bobcat population estimates are based on credible scientific wildlife population studies.

### **The Place of Bobcats in the Adirondack Ecosystem**

Any wildlife management plan must necessarily locate that wildlife population within the ecosystems in which they live. The Adirondack Forest Preserve is the largest wilderness area in the northeast, containing dozens of varied ecosystems ranging from mountains to valleys to swamps and open areas, from pine forests to boreal forests to mixed hardwood forests. While some areas are remote, other areas are near hamlets and farms, so it is a diverse landscape.

The Adirondack Forest Preserve is protected by Article 14 of the New York State Constitution, commonly known as the "forever wild" clause. Thus, there is a Constitutional mandate for DEC to protect the forever wild nature of the Forest Preserve, including the entire ecosystem which by necessity includes all the wildlife that lives there. According to DEC, the Adirondacks have a bobcat population of about five animals per 100 square miles, or about 20 square miles each. The Adirondack Park is roughly 9,000 square miles, so the bobcat population could be in the hundreds. This calculation only points to the fact that the DEC has no reliable information, no credible scientific estimate, just a best guess about the state's bobcat population. Nor does DEC have any idea how well the bobcat is thriving within the Adirondacks, or any other part of the state, whether the population is robust or just managing to hang on.

Yet, despite the lack of a credible population, the Adirondack Park is purported to be a core bobcat population center for the whole state as bobcats might disperse from the Adirondacks to the Catskills, Tug Hill, the Taconics and further west. The other core bobcat population is

Pennsylvania, with a long and heavily wooded border with southern and western New York. Probably the “growth” of the bobcat population in western New York is from the Pennsylvania population. It should be noted that bobcat hunting in Pennsylvania is tightly regulated, only allowed in certain areas of the state for a short 23-day season in January, and only one bobcat can be taken per license.

Much of the result of the 2012 Bobcat Management Plan was a new hunting and trapping season in Western New York based on the idea that the population there was “recovering” from having been nearly extirpated in the early twentieth century. This is based on hunter and trapper observations and the fact that bobcats are now present there when they were not previously, but not on any scientific research or survey of the population.

The major predators in New York State were largely extirpated in the 19th and early 20th centuries leaving a predator void in the ecosystem. The effects of this would vary from ecosystem to ecosystem, but wolves and cougars have struggled to return. Coyotes and bobcats are presently the major predators in the Adirondacks, and in most of the rest of New York State. There are other predators, but it is critical that the Adirondack ecosystems have major predators present and in large numbers. Because DEC has done so little research, we simply do not understand the dynamics of predator and prey in the Park, with little idea of the exact role that coyotes and bobcats play.

This not only affects wildlife populations, but also all other ecologies in the Park. For example, an overpopulation of deer has devastated forest reproduction and weakened the forest base of the entire state. This bobcat management plan should address these matters, but it fails to do so. As global warming is the most significant ecological issue of our time, this is inexplicable. There is a science of wildlife ecology and a science of wilderness ecology, taught in numerous universities that DEC can access. It should be noted here that DEC has hired no wilderness management experts to help manage the Forest Preserve.

## **The Bobcat Population**

Obviously, a larger bobcat population would be a more effective predator population than a small bobcat population, at least up to the point that an ecological balance is achieved. But nothing in the Bobcat Plan addresses that ecological balance. There are extensive studies of this dynamic in the many studies of wolf restoration, although obviously bobcat ecological dynamics are different. The 5,000 total population estimate from the 2012 Bobcat Management Plan was based on extrapolations of hunter and trapper reports of an animal rarely ever seen. There could be 10,000 or more; there could be fewer than 2,000. But we have no way of knowing, nor does DEC. In the “Current Status of Bobcats in New York” section of the draft Bobcat Plan, DEC provides no estimate for the current number of bobcats in New York. DEC even despairs its ability to conduct meaningful population surveys. The report states:

Developing reliable estimates of wildlife population trends is crucial to the proper management of wildlife species, including bobcats. To date, most of DEC’s understanding of bobcat populations is from harvest data. Since harvest can vary annually

due to a variety of factors unrelated to animal abundance (e.g., hunter effort, weather, fur prices), harvest-independent data is a more accurate reflection of wildlife populations. In addition, harvest-independent data provides information in areas without harvest seasons.

While DEC acknowledges the limitations of its methodology for estimating the bobcat population, it nevertheless hazards a crude guess. DEC assumes that the bobcat population is stable or even increasing because hunters and trappers kill about 400 bobcats a year across the state. But it simply does not follow that the actual population is still anywhere near 5,000 animals. It also assumes that hunters and trappers honestly and accurately report their kills, which contradicts some of DEC's own scanty evidence. DEC's own sample of 70 examined bobcat carcasses shows that many of them were hunted or trapped and not reported, that is shot or trapped, escaped, and died. This is inconsistent with the 400 hunter/trapper reports, and would add about 20% to the total kill. These are also only the known carcasses, not those lost in the woods. Moreover, since there are no bag limits for bobcats and trappers/hunters could kill as many as they like, unlike other game species where the take is regulated, if the population was as high as DEC estimates, then more bobcats would be successfully hunted.

DEC data also attempts to explain away the 2013 "spike" to 800 killed in one year as based on an increase in the price of furs, but obviously if killing 400 shows stability, a spike to 800 undermines that conclusion. If 800 can be killed, instead of 400, exactly what is the population? And how many might be killed next year and the succeeding years? DEC data also shows that in areas where hunting/trapping is allowed, harvest success rates have declined (Figure 9), bobcat observations have declined (Figure 12), and bobcat harvests have declined (Figure 13). This is surely not "stability."

There is research that demonstrates that DEC's conclusion that the bobcat population is stable is dangerously wrong. According to the scientific study of the New York bobcat population by Cornell University wildlife biologists "bobcat populations remain critically low". Friedlander, *Remote Cameras Capture Insights into NY's Wildlife Populations*, Cornell Chronicle, Feb. 13, 2024<sup>2</sup>. The full study is published as "*Landscape-scale Population Trends in the Occurrence and Abundance of Wildlife Populations using Long Term Camera Trapping Data*" Biological Conservation 290, February 2024. "Despite recent recoveries elsewhere, bobcat populations in New York State displaced very low occupancy highlighting the necessity of monitoring to inform conservation action." This trail camera study was based on 62,895 sampling days at 2,995 sites in central and western New York, recording only 116 detections of bobcat, just 4%, some of the lowest of all wildlife recorded. DEC financed this study and now proposes a ten-year plan that ignores this conclusion and fails to cite this study.

Given that there is an international market for the furs of small wild cats, similar to the bobcat, of which there are a number of similar species around the world including many that are endangered, another "spike" could foreseeably lead to rapid depopulation in New York State within the span of a few years. If hunters and trappers can increase their kill to 800 from 400 in the span of one year, 800 represents nearly 20% if the population is 5,000 bobcats. All of this data are speculative, and this entire plan is based on this speculation, not on reliable science.

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<sup>2</sup> Available at <https://news.cornell.edu/stories/2024/02/remote-cameras-capture-insights-nys-wildlife-populations> (last accessed March 1, 2024).

Because it is clear that the bobcat is harmless to humans, it would seem that there is no cost at all in pausing the hunting and trapping of bobcats, and scientifically studying the population recovery that would hopefully follow. The Bobcat Plan itself states that few hunters and trappers are primarily after bobcat: there are too few of them and they are too hard to find. Rather, the kills are fortuitous, so there is, unlike for example deer hunting, no economy that is based on bobcat hunting. The hunting and trapping season does not fill up hotels, restaurants, and gas stations or have any significant impact on the economy. Hence, there is no cost to simply letting nature take its course and seeing if and how the bobcat population grows as it has done in the Population Growth Area where hunting/trapping bobcats is not permitted. DEC notes that bobcats kill chickens and that DEC issues a dozen or so “nuisance” permits each year to kill these bobcats. We do not believe this is a major cause of the depletion of bobcats and bobcats do not significantly threaten farm animals.

### **Human Use and Enjoyment of Bobcats**

A bobcat sighting is a memorable wild experience, sought after by hikers, hunters, canoeists, and all those who share a love of wilderness. These sightings are very rare and having a population of five bobcats (or less?) per 100 square miles reveals why. Most visitors to the Adirondack Park report that hiking and a wilderness experience is the primary attraction of the Park and seeing a bobcat would enhance that experience. It should follow that twice the sightings would follow from twice the population. Nobody has any idea what the capacity for bobcat population is in the Adirondacks, but DEC can surely make some effort to find out that capacity. There is some appropriate population balance in nature, and ecological science can determine what it is. Why rely on hunters and trappers for data? How many hikers on the Northville-Placid Trail have the opportunity to see bobcats in the wild? Why not enlist hikers all over the Park to record bobcat sightings? Why not require DEC staff to systematically report bobcat sightings? Or loggers and others who work in the woods. There could be signs at every trailhead asking hikers to report bobcat sightings to a designated DEC office. Significant use of radio collars could enable tracking the existing population and learning more about bobcat ecology. Trail cameras can be set up and monitored.

### **The Long New York Bobcat Hunting Season that Runs into Deep Winter is Cruel**

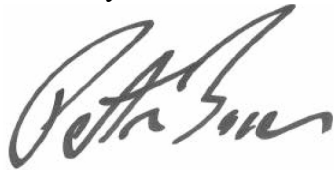
The 2012 plan extended bobcat hunting into mid-February each year, deep into the heart of the winter. Winter stresses wildlife populations in New York and there was no scientific reason for lengthening the season. Winter stresses are compounded by hunting. As mentioned above, Pennsylvania has a 23-day bobcat season, Vermont’s season is less than one month, New Hampshire and Connecticut closed their bobcat season years ago, Ohio in studying its bobcat population and may propose hunting in the future, while Maine and Massachusetts are similar in scope to New York – long seasons with no bag limits. The new DEC plan cites the extended season as an accomplishment, but this conclusion is based on a survey of “4,500 trappers and furbearer hunters to evaluate season date preferences for bobcats and other furbearers.” Surveying bobcat hunters and trappers about their desire for a longer hunting season is hardly a protocol for sound management by a regulatory and wildlife management agency.

## Conclusion

When and if the bobcat population stabilizes at some higher density, DEC can then review its hunting and trapping regulations. Indeed, a larger bobcat population would then benefit hunters and trappers. DEC needs to take the time and expense to conduct a proper scientific study of the population and then make a new plan based on current population data. The current draft Bobcat Plan is not supported by sufficient reliable scientific data. Protect the Adirondacks asks that the plan not be implemented, that a scientific study of the bobcat population of New York State be conducted, and that the hunting and trapping of bobcats be suspended until such study is completed and a new management plan can be prepared.

On behalf of the Board of Directors of Protect the Adirondacks, please let me express our gratitude for the opportunity to provide these public comments on the draft Bobcat Plan.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Bauer". The signature is fluid and cursive, with a large initial "P" and "B".

Peter Bauer  
Executive Director