



49651 Shenandoah Circle, Canton, MI 48187
www.attorneysforanimals.org

NATURAL RESOURCES COMMISSION MEETING

THURSDAY, FEBRUARY 10, 2022, 9:00AM

LANSING COMMUNITY COLLEGE

LANSING, MICHIGAN 48917

**WILDLIFE CONSERVATION ORDER AMENDMENT NO. 1 OF 2022; AGENDA ITEM VII (c)(i):
OPPOSITION TO PROPOSED ORDER EXPANDING HUNTING SEASON FOR BOBCATS**

February 9, 2022

Via email: nrc@michigan.gov

cc: Dan Eichinger, Director, DNR, via email: EichingerD@michigan.gov; Kara Cook, Senior Advisor on Energy and Environment to Governor Whitmer via email: cookk14@michigan.gov

Chair Rose and members of the Natural Resources Commission:

Attorneys for Animals, Inc. (AFA) is a Michigan non-profit and 501(c)(3) organization of legal professionals and animal advocates. AFA's Board of Directors voted to oppose the proposed Order as it relates to bobcats.

First, the proposed Order is not based on principles of sound science. The population of bobcats is not reliably known because the DNR does not conduct population surveys. Rather, it appears the population is deduced from citizens' reports, and by using Wisconsin data (this Order would apply to those parts of the state that do not border on Wisconsin). The DNR specialist recently said "Over the last decade, we have seen an increase in people reporting sightings of bobcats in the Lower Peninsula. That's very suggestive of a healthy, resilient population."ⁱ

Second, the proposed Order is based on input from "stakeholders." However, the only stakeholders mentioned are the Furtaker User Group, hunters and trappers. This is a very narrow definition of stakeholders, indeed, and excludes all non-consumptive stakeholders. It is at odds with the "Public trust responsibilities" articulated in the Wildlife Division's Guiding Principlesⁱⁱ:

We uphold our responsibilities under the public trust doctrine, that wildlife resources are held in trust by government for the people of Michigan, both now and into the future. As the trust managers, we work to conserve wildlife on the people's behalf, balancing providing short-term benefits with long-term sustainability of our trust resources. The public trust doctrine is the foundation of our work, and we remain accountable to the public in fulfilling our trust obligations.

We urge the Commission to consider the process used by Indiana. In March 2018, the state's DNR proposed a bobcat hunt. It scheduled public hearings before the Natural Resources Commission formally considered the proposal in May 2018.ⁱⁱⁱ At the May NRC meeting, the DNR director, responding to input by the public (ie, "stakeholders"), withdrew the proposed Order before it was even considered.^{iv} We urge the Commission to direct the DNR to consult with more of its stakeholders.

Finally, we encourage the Commission to prioritize establishing hybrid meetings, which we understand is not even under consideration. This is a mistake. As you consider important issues in the upcoming months, you will benefit from hearing a variety of opinions and engaging with people, which can only be meaningfully accomplished when your meetings allow both in person and remote attendance and participation.

Very truly yours,



Beatrice M. Friedlander, JD
Board President

ⁱ Bridge Michigan, "Michigan moves to expand bobcat hunting as other states eye restrictions", Feb. 1, 2022, <https://www.bridgemi.com/michigan-environment-watch/michigan-moves-expand-bobcat-hunting-other-states-eye-restrictions>

ⁱⁱ THE GPS GUIDING PRINCIPLES AND STRATEGIES Michigan Department of Natural Resources Wildlife Division Strategic Plan 2021-2026, https://www.michigan.gov/documents/dnr/Wildlife_GPS_Strategic_Plan_434049_7.pdf at page 9 of 20

ⁱⁱⁱ <https://www.indystar.com/story/news/2018/03/05/indiana-dnr-proposes-allow-hunting-and-trapping-bobcats/386901002/>

^{iv} Indy Star, "DNR Director: 'We heard you,' says no to bobcat hunting and killing nuisance wildlife", IndyStar, May 15, 2018 (updated May 16, 2018), quoting the DNR director, "'As we all know, that is a rather sensitive topic to a number of people and we have heard from you and appreciate the interest and always appreciate people getting involved in the process,' Clark said of his motion to withdraw the rule on bobcat hunting. 'We feel we need to work more with our constituencies on sensitive issues like this.'" <https://www.indystar.com/story/news/2018/05/15/bobcats-raccoons-and-coyotes-saved-dnr-withdraws-controversial-proposals/611312002/>