



# COUNTY OF SANTA CRUZ

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## FISH AND GAME ADVISORY COMMISSION

701 OCEAN STREET, ROOM 312, SANTA CRUZ, CA 95060  
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November 3, 2011

Dear Honorable Supervisors:

Santa Cruz County is blessed by the presence of great biodiversity – including several globally-endangered amphibian species (Santa Cruz long-toed salamander, California Tiger salamander and California red-legged frog). Unfortunately, these amphibians suffer many threats to their continued existence – ranging from disease, pesticides, roadkill, predation, competition and outright destruction of their habitat. One of the primary threats to our native amphibian populations is the American Bullfrog, which is native to the eastern United States. The bullfrogs cause many problems throughout Santa Cruz County and the American West due to their propensity to eat native amphibians and other wildlife, and due to their high rates of infectious disease such as chytridiomycosis, which has driven many amphibian species to complete extinction worldwide in recent years (see Attachment 1 for more details).

Therefore the County Fish and Game Commission is hereby recommending that you approve a ban on the sale, possession, importation and release of American Bullfrogs (see attachment for more details) as both an on-the-ground attempt to start limiting the presence of bullfrogs as well as a vehicle for improving awareness of this problem and the importance of native amphibian conservation in general.

There are wild populations of bullfrogs thriving in the County. While the ban would not directly affect these populations, it would build awareness about their impacts and help reduce the number of people transporting these animals to other waterbodies. Landowners with existing bullfrog populations may become newly aware of the impacts of their population and engage

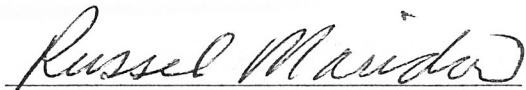
in voluntary eradication efforts, and entities engaged in ESA permitting may have an incentive to support eradication of bullfrogs in addition to other conservation actions. A ban would also help to prevent the continued influx of bullfrogs into the county.

We recognize that it is more appropriate for this regulatory action to occur on the state level. While, the State of California Fish and Game Commission has twice voted to ban the importation and sale of bullfrogs, the Department of Fish and Game still allows it. Therefore - in addition to initiating development of language to ban bullfrog importation and sales in the County - we also encourage the BOS to contact CA Secretary of Natural Resources John Laird to communicate its concerns about this matter and ask that he review the state commission's relative inaction on this matter.

There are only a handful of locations where bullfrogs can be bought in the County, but there are numerous online retailers offering bullfrogs (as well as other non-native amphibians) for sale. We are all too aware of our relative inability to enforce existing regulations, let alone new ones. However, enforcement could occur on an as-needed basis with fine structures that would support costs, or voluntary compliance could be left to market incentives where retailers who abstain from selling bullfrogs could be recognized through "green business" or other similar programs.

Thank you for your consideration. If you have any questions about these matters, please do not hesitate to contact me.

Sincerely,



Russell Maridon - County of Santa Cruz Fish and Game Commission Chair

Attachment - Correspondence Save the Frogs Director Kerry Kriger for the June 2011  
Commission Agenda

cc: Fish and Game Commissioners, Kerry Kriger