

Dear California Fish & Game Commission,

On behalf of SAVE THE FROGS! and our worldwide network of supporters, staff and volunteers, I am writing to submit an official comment related to the Department of Fish & Wildlife's ecologically destructive bullfrog importation policy. Please distribute this letter to all Commissioners prior to the Commission's February 12, 2015 meeting.

SAVE THE FROGS! opposes the importation of live American Bullfrogs into California. The bullfrogs: (1) spread chytridiomycosis, the worst disease in recorded history in terms of biodiversity loss; (2) eat native wildlife; and (3) compete with native wildlife for habitat. SAVE THE FROGS! also questions the legality of California's bullfrog importation program as the bullfrogs threaten federally endangered species and the state has not conducted appropriate CEQA assessments.

SAVE THE FROGS! (www.savethefrogs.com) is the world's leading amphibian conservation organization. Our mission is to protect amphibian populations and to promote a society that respects and appreciates nature and wildlife. Headquartered in Berkeley, we work in California, across the USA, and around the world to prevent the extinction of amphibians, and to create a better planet for humans and wildlife. Since 2008, SAVE THE FROGS! scientists and volunteers have held over 1,400 educational events in 59 countries to educate people about the plight of frogs and teach them ways to protect amphibians.

Amphibian populations have been declining in California and worldwide at unprecedented rates, and nearly one-third of the world's amphibian species are threatened with extinction. Up to 200 species have completely disappeared since 1980, and this is NOT normal: amphibians naturally go extinct at a rate of only about one species every 500 years. Amphibian populations are faced with an array of environmental problems, including pollution, infectious diseases, habitat loss, invasive species, climate change, and over-harvesting for the pet and food trades. Unless we act quickly, amphibian species will continue to disappear, resulting in irreversible consequences to the planet's ecosystems and to humans. Frogs eat mosquitoes; provide us with medical advances; serve as food for birds, fish, mammals and reptiles; and their tadpoles filter our drinking water. Plus frogs look and sound cool, and kids love them -- so there are lots of reasons to protect California's remaining amphibian populations.

Bullfrogs are native to eastern North America, but have established populations throughout the western USA, where they cause massive ecological damage due to their voracious appetites for native wildlife; their propensity to spread deadly diseases; and their role as competitors with native amphibians for limited food resources (www.savethefrogs.com/bullfrogs). Bullfrogs are listed on



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the IUCN's list of 100 worst invasive species. Widespread consensus exists in the scientific community regarding the harm caused to native wildlife by American Bullfrogs and numerous scientific studies exist detailing the ecological damage caused by the bullfrogs. Furthermore, the Department of Fish & Game produces printed literature describing the harms caused by the bullfrogs. In 2010 the CA Fish & Game Commission twice voted to stop the importation of all live non-native frogs and turtles for use as food. In 2012 the City and County of Santa Cruz instituted legislation restricting sales and importation of American Bullfrogs.

The eradication of bullfrogs from critical amphibian habitat is an integral part of the management plans for many threatened amphibian species in the western USA. However, efforts to eradicate bullfrogs will be futile in the long-term so long as bullfrogs are still being imported into the states to which they do not belong, as the frogs inevitably escape into the wild or are intentionally set free. Thus the continued importation of American Bullfrogs into California runs contrary to state and federal Endangered Species Acts and is in the worst interest of the state's ecosystems and native wildlife. The bullfrogs create a massive financial problem for state agencies tasked to control them, and make it difficult for nonprofit organizations to achieve their missions related to wildlife conservation.

SAVE THE FROGS! supports a ban on the importation, sale, release and possession of live American Bullfrogs into and within California. Such a ban has received widespread support from a variety of California-based nonprofit organizations as well as thousands of citizens who have signed our petition to Governor Jerry Brown. Department of Fish & Game's Inland and Anadromous Fisheries Branch Chief Stafford Lehr has personally seen these petition signatures and can attest to their existence. Each Commissioner and all reading this comment can add their name to the electronic petition at:

www.savethefrogs.com/bullfrog-petition

Those who enjoy eating bullfrogs can choose another food to eat or they can eat frozen bullfrogs or another species of frog (though I do not recommend this as both wild-caught and farm-raised frogs cause massive ecological damage). They could also go out into the wild and catch a feral bullfrog, which would help alleviate the state's bullfrog problem. Those who like to jump American Bullfrogs in contests can catch and use feral bullfrogs. Those who like to use bullfrogs as pets can find a different pet species; go catch their own feral bullfrog for a pet; or better yet go outdoors and visit native frogs in their wild habitats in lieu of holding a frog in a tank against its will and without its consent.

The mission of the Department of Fish and Wildlife is to manage California's diverse fish, wildlife, and plant resources, and the habitats upon which they depend, for their ecological values and for their use and enjoyment by the public. The importation of American Bullfrogs provides no benefit to native wildlife, plant resources, or the habitats upon which they depend, and decreases Californians ability to use and enjoy the state's natural resources. Regardless of the Department's

stance on what it is legally required or able to do regarding bullfrog importation permits, as the issuer of the permits, the Department has a moral and ethical obligation to work diligently to prevent further damage to California wildlife caused by American Bullfrogs. As such and to ensure the future of California's native wildlife I urge the Department of Fish & Game and the Fish & Game Commission to immediately implement a plan to bring California's bullfrog importations to a halt.

Please feel free to contact me with any questions regarding any aspect of amphibian conservation or these comments.

Sincerely,

A handwritten signature in cursive script that reads "Kerry Kriger".

Kerry Kriger, Ph.D.

25-January-2015