

312 IAC Natural Resources Commission

Interim Rule Regulatory Analysis

LSA Document #26-102

I. Description of Rule

a. History, Background, and Scope of the Rule – 312 IAC 9-3-18.1: The General Assembly passed SEA 241 (P.L.32-2024) which required the department to adopt rules to establish a license to take a bobcat not later than July 1, 2025. The first bobcat trapping season began on November 8, 2025, and ended on December 6, 2025, when the season quota was reached.

The bobcat population has expanded during the last two (2) decades. Despite incidental takings having increased with more than one hundred thirty (130) mortalities reported annually since 2010, the department believes the population in the southern part of the state is sufficient to withstand a regulated harvest. There are several reasons to allow regulated bobcat hunting. First, there has been an increase in the number of bobcats accidentally taken in vehicle collisions and traps set for other species, including coyotes and raccoons. Second, the number of landowners requesting a permit to take bobcats that are killing livestock increased from fourteen (14) in 2018 to thirty-four (34) in 2025. Third, there has been an increase in costs for businesses and landowners who have experienced losses from bobcats. At this time, an individual may not keep or use a bobcat accidentally captured in a trap set for another species. Allowing individuals to take bobcats would allow trappers to sell the hide and other parts of the bobcat. Because hide prices average one hundred dollars (\$100) per animal, the proposed rule gives licensed trappers and fur buyers the ability to earn money from the hides.

Illinois, Kentucky, Michigan, and Wisconsin currently have seasons to take bobcats. Additionally, the counties listed in the proposed rule for taking bobcats are the counties where the habitat analysis done by Purdue University shows good coverage of quality habitats that can support a healthy, self-sustaining bobcat population. Department records include regular documentation of bobcats in these counties. The department is proposing to have an open season only in those counties where there is a healthy, reproductive population with habitats shown to be able to support the growing bobcat population. There are counties that have suitable habitats, but fewer documented bobcats. The department considers the counties where there are fewer documented bobcats to be emerging bobcat populations; therefore, the department is not currently proposing to open additional counties.

The department is proposing to prohibit the use of dogs to assist in taking bobcats, with the exception of authorized government agency wildlife management staff, to allow for a more equal opportunity between hunters and trappers. The hours open to hunting are consistent with the hours for deer hunting.

Figure 1 below shows all documented reports of bobcats since 1970, and Figure 2 below shows public reports of bobcats that are confirmed from the Large Mammal Report (2015–2020) and confirmed or credible on the Report-A-Mammal website through March of 2024.

Figure 1

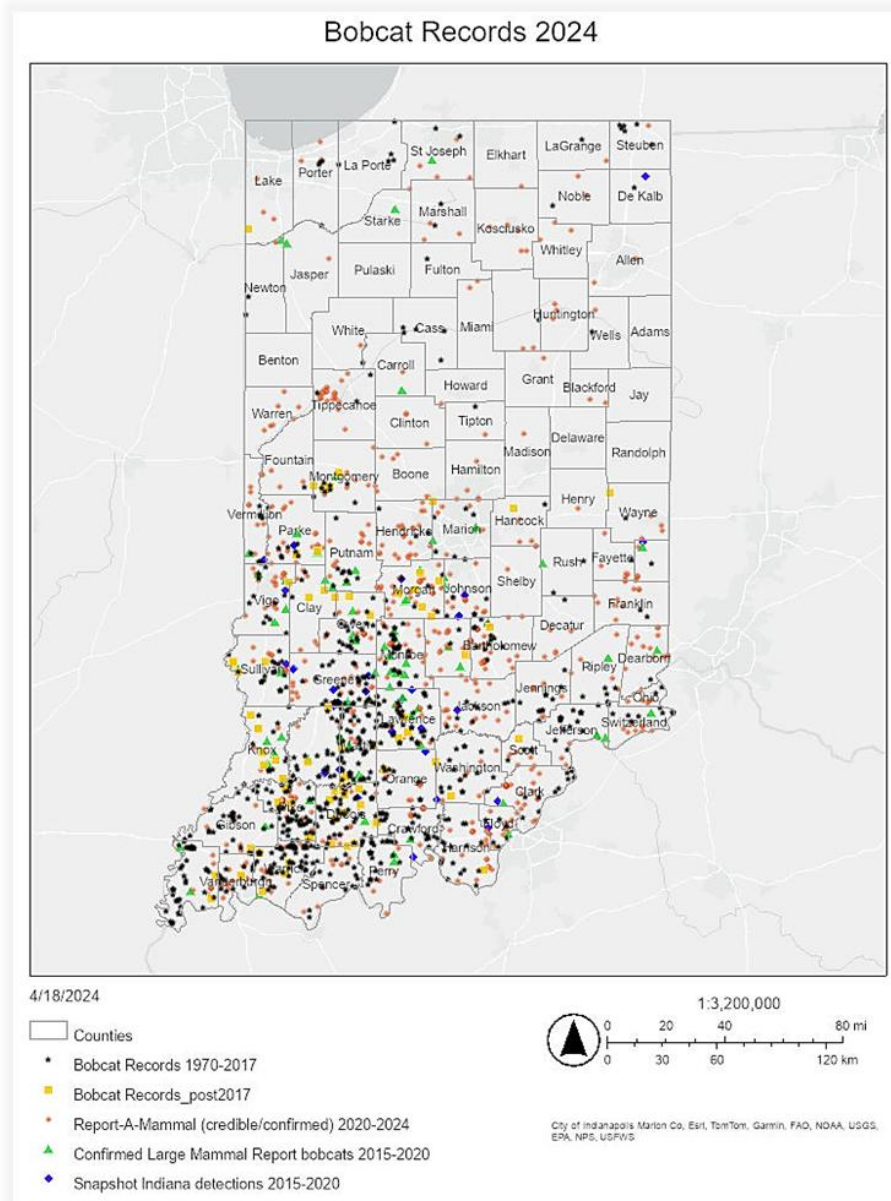
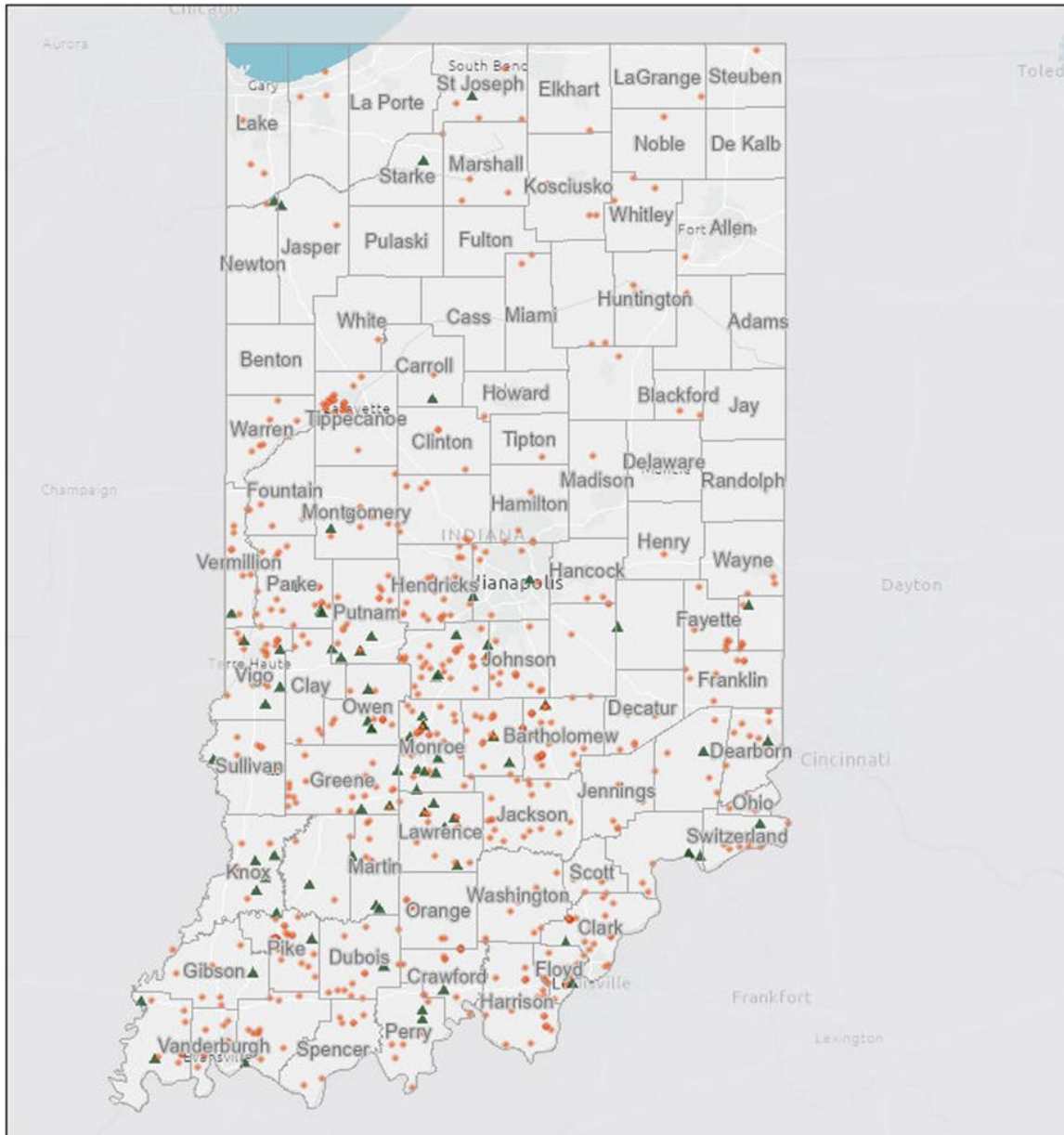


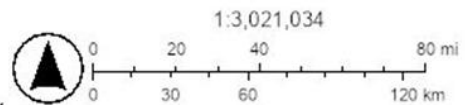
Figure 2

Bobcat Records 2024



4/8/2024

-  Counties
-  Report-A-Mammal (credible/confirmed) through March 2024
-  Confirmed Large Mammal Report bobcats 2015-2020
-  MASK



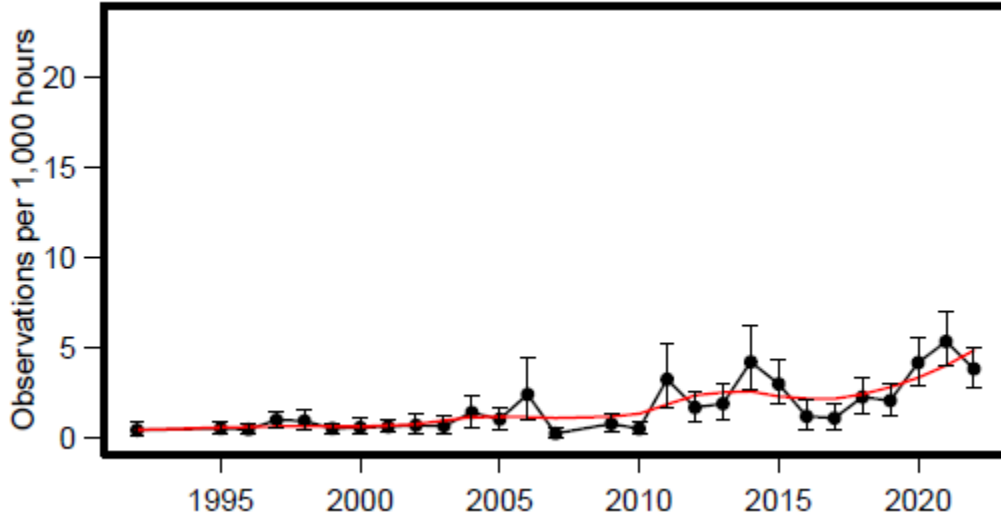
City of Indianapolis Marlon Co, Esri, TomTom, Garmin, FAO, NOAA, USGS, EPA, NPS, USFWS

The public helps the department track possible bobcat expansion into new counties by reporting bobcat sightings. Beginning in 2015, the online Large Mammal Report collected reports of bobcat sightings. In 2021, the revamped Report-A-Mammal online report form began collecting reports of bobcat sightings. The reports are reviewed by department staff and marked as “confirmed” or “unconfirmed” for the Large Mammal Report, and “Unconfirmed”, “Credible”, or “Confirmed” for the Report-A-Mammal online report. Reports are confirmed by photographic or video evidence. Credible reports typically have details in the descriptions to support reliable identification.

The Archer’s Index is a population trend survey the department uses to monitor population trends. Volunteer bowhunters sign up in advance and report the hours, the county, and each species observed while hunting during the October and early November archery season. The survey began in 1992. Typically, at least two thousand (2,000) and not more than four thousand (4,000) days, and at least ten thousand (10,000) and not more than fifteen thousand (15,000) hours hunted are reported by volunteers. Average bobcat observations on the Archer’s Index increased from less than one (1) bobcat seen for each one thousand (1,000) hours hunted in the 1990s, to four (4) bobcats seen for each one thousand (1,000) hours hunted beginning in 2020. The observations on the 2024 Archer’s Index can be found in Figure 3 below.

Figure 3

Statewide

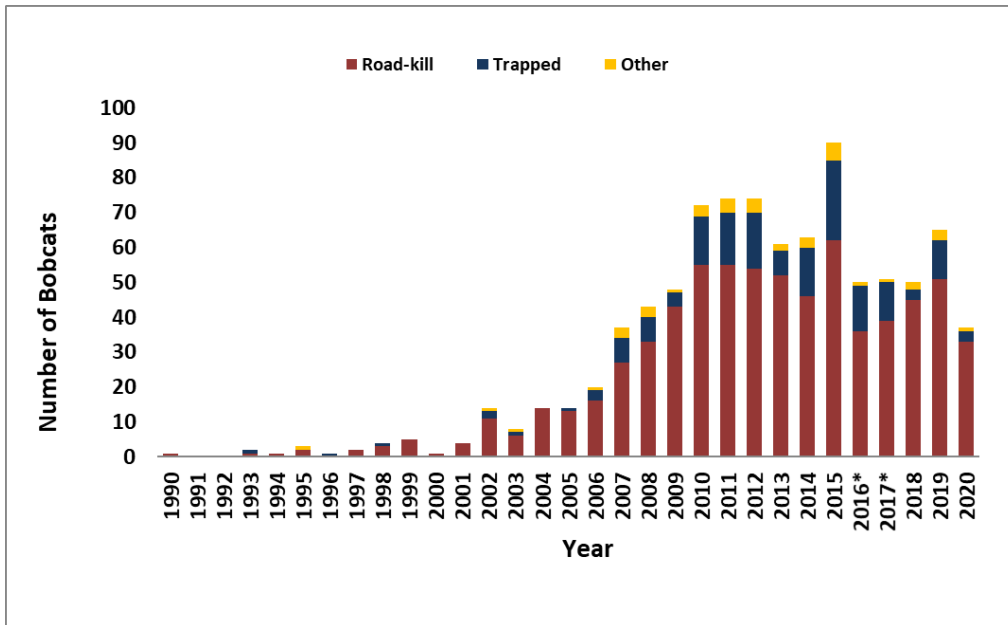


Bobcats in the state were captured in traps and fitted with tracking collars during the late 1990s and early 2000s. Collaring occurred in the southern part of the state, primarily in Daviess, Greene, Lawrence, and Martin Counties. Multiple aspects of bobcat life history were collected, including information about survival and mortality. The information was summarized in an American Midland Naturalist publication in October 2020.

Motor vehicle accidents are the leading cause of death for bobcats collared for research. Fifty-three percent (53%) of bobcats collared for research were taken because the bobcat

was struck by a motor vehicle. The annual bobcat mortality survey, conducted until 2020, found motor vehicle accidents were the leading cause of bobcat mortality in the state and, reflects a similar percentage. See Figure 4.

Figure 4



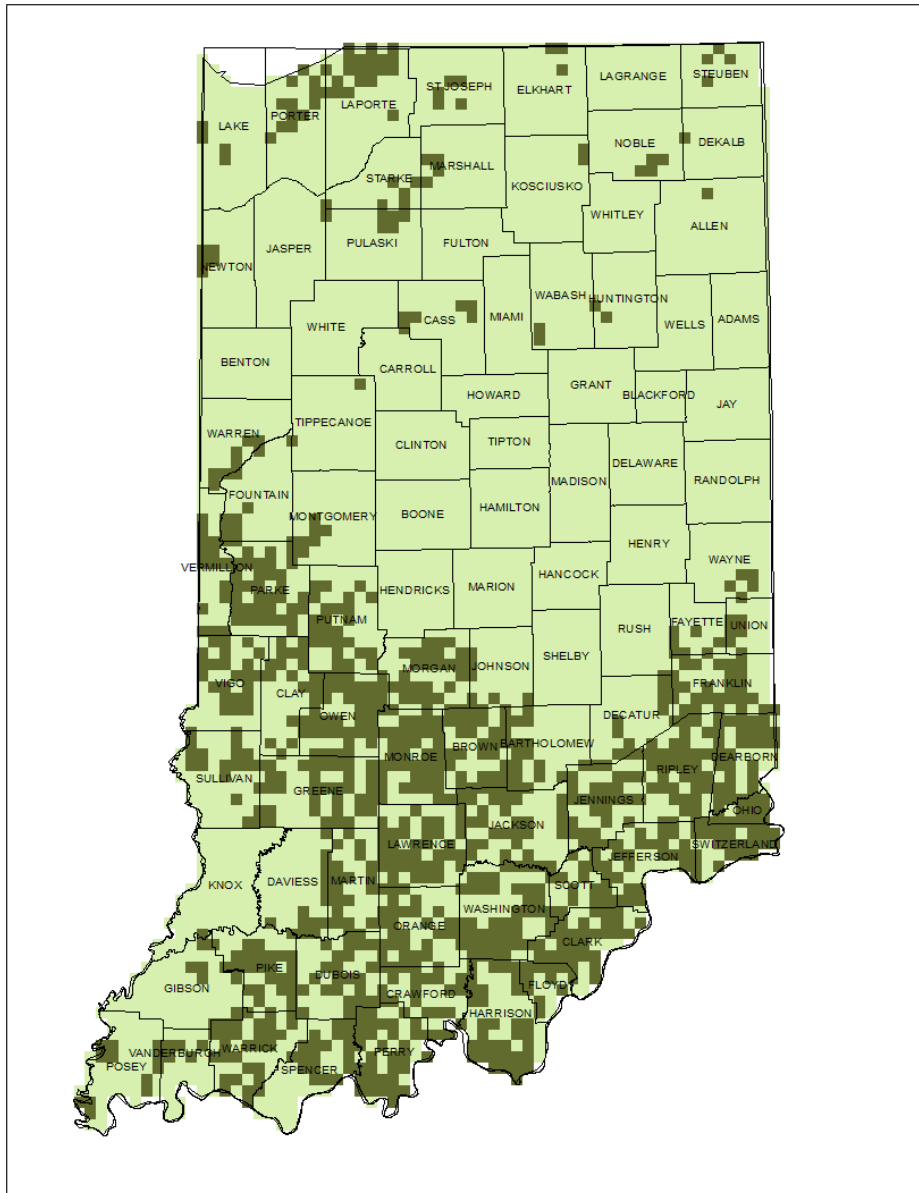
Seventy-five percent (75%) of adult bobcats survived from one (1) year to the next, and ninety-five percent (95%) of bobcats, less than two (2) years of age, survived from one (1) year to the next. The numbers in Figure 4 do not reflect the survival rates of a bobcat less than one (1) year of age, or a bobcat that is at least one (1) year of age and not more than two (2) years of age. Based on the kitten survival rate found in recent scientific literature, the average kitten survival rate is estimated at thirty percent (30%).

Purdue University also determined bobcat habitat selection and home range size from collaring bobcats. Bobcats in the state preferred forest edges and somewhat avoided agriculture when selecting habitats. Adult, female bobcats need approximately nine (9) square miles to successfully raise their young. Male bobcats are not monogamous and do not pair with one (1) female bobcat mate, so male bobcat home ranges typically overlap multiple female bobcat habitats and were an estimated ninety-one (91) square miles. The home range numbers are representative of the time beginning in the early 2000s and ending in the mid-2000s when populations in the southern part of the state were still emerging and growing in many areas. The numbers are likely to shift as bobcat populations and densities change.

From this habitat and home range research, Purdue University made a map of the available bobcat habitats, see Figure 5. Figure 5 shows the calculation of the areas that are suitable for an adult, female bobcat to find nine (9) square miles to successfully raise their young. Figure 5 shows a conservative estimate of bobcat habitats and assumes that

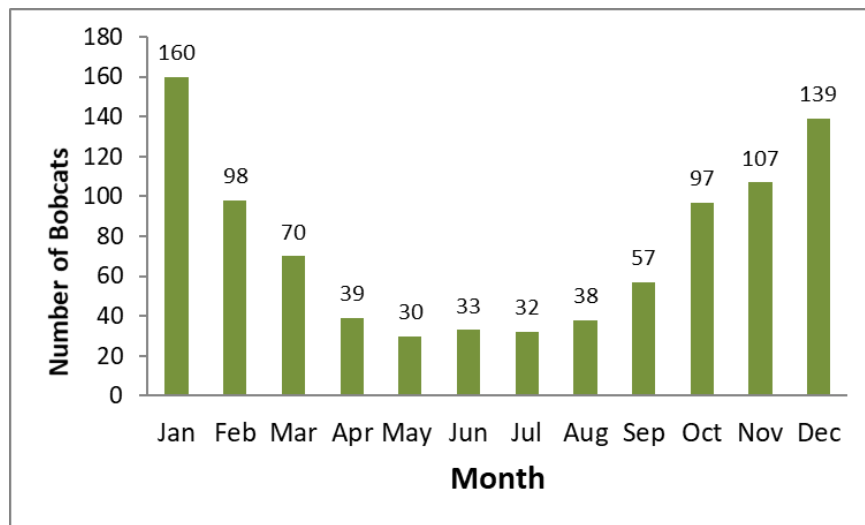
anywhere that does not provide nine (9) square miles of habitat is not a bobcat habitat. This estimate is calculated based on adult female bobcat needs. However, young bobcats will disperse through other habitats, living in the habitats while waiting for territories to be available. Adult female bobcats will also live in habitats that are less than ideal to raise their young when required to do so. This system is a binary yes or no regarding whether a block is suitable for a bobcat and does not account for the possibility of larger or smaller home ranges, male home range needs, or dispersing bobcats. The dark green squares represent quality habitats of blocks of nine (9) square miles with habitats suitable for adult female bobcats to raise their young.

Figure 5



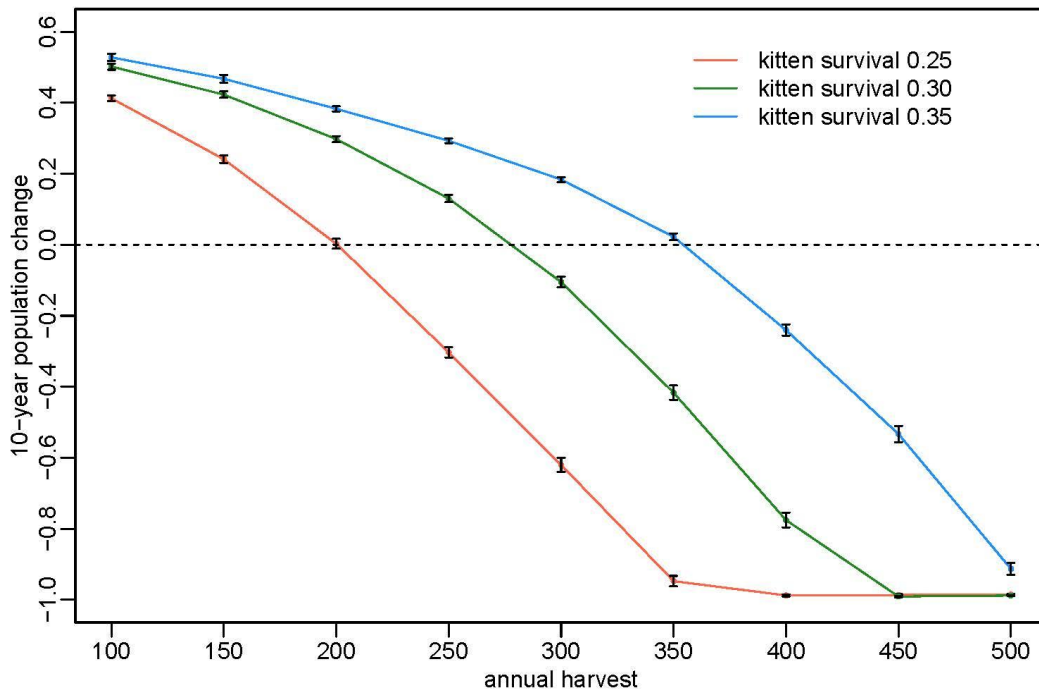
Purdue University researchers developed a population model in the program Net Logo for department staff to use should management of a harvest season be required. The population model incorporates the basic aspects of bobcat life history and simulates bobcat population dynamics in the state. The population model is conservative and assumes adult female bobcats do not raise young in habitats less than nine (9) square miles. The population model also assumes existing mortality sources remain at the same level and harvest mortality is added to those mortalities. Figure 6 shows the months when bobcat mortalities were reported on the Annual Bobcat Mortality Survey, which concluded in 2021. The highest number of mortalities were reported in November, December, and January.

Figure 6



Additionally, Figure 7 illustrates bobcat harvest simulations from the population model at three (3) different levels of kitten (less than one year of age) survival. Any points above the dotted line would show a stable-to-increasing bobcat population. If the points fall below the line, the data suggests there may be a downward trend in the bobcat population over time.

Figure 7



Purdue University is continuing to collaborate with the department regarding habitat models and will continue to improve and build upon the models with additional data as the data becomes available.

b. Statement of Need – The proposed rule is needed to increase the statewide quota from two hundred and fifty (250) to four hundred (400) bobcats and allow opportunities for hunters to take bobcats.

c. Statutory Authority for the Proposed Rule – The department is required to establish a season to take a bobcat under IC 14-22-6-17, and the agency has the statutory authority to establish the methods for taking a wild animal under IC 14-22-2-6. The department is also required to develop rules that are based upon the following under IC 14-22-2-6: “(A) The welfare of the wild animal. (B) The relationship of the wild animal to other animals. (C) The welfare of the people.” “Wild animal” is defined under IC 14-8-2-318 and includes mammals. The Natural Resources Commission (commission), in coordination with the department, has the statutory authority to adopt rules under IC 14-10-2-4.

d. Fees, Fines, and Civil Penalties – The proposed rule does not add or increase a fee, fine, or civil penalty.

II. Fiscal Impact Analysis

a. Anticipated Effective Date of the Rule – The anticipated effective date of the proposed rule is September 1, 2026.

b. Estimated Fiscal Impact on State and Local Government –The department anticipates there will be no fiscal impact on local government. The department sold one thousand six hundred and forty-two (1,642) bobcat licenses in 2025 when the season was only open to trapping. The department reviewed the data for licensed coyote hunters as the basis of bobcat hunting licenses. The department believes these hunters are likely to also want to hunt bobcats. The department expects approximately ten thousand eight hundred (10,800) hunters will purchase a bobcat license. The department assumes that thirty-three percent (33%) of coyote hunters will purchase a license. In 2021, the department estimated that there were thirty-two thousand seven hundred twenty-five (32,725) coyote hunters in Indiana based on a survey of small game license holders. Multiplying thirty-two thousand seven hundred twenty-five (32,725) by thirty-three percent (33%) provides the total of ten thousand eight hundred (10,800) bobcat hunters. If one thousand five hundred (1,500) trappers will continue to purchase a bobcat license, the total number of bobcat license sales would be approximately twelve thousand three hundred (12,300). At a cost of fifteen dollars (\$15) each, the estimated revenue for the department would be one hundred eighty-four thousand five hundred dollars (\$184,500) for the Fish and Wildlife Fund (39745). This is the best estimate based on available data to the department at this time.

It will take department staff approximately five (5) hours of time, costing the department approximately three hundred seventy-two dollars and fifty cents (\$372.50) in the year the changes take effect to incorporate these rule changes into news releases, electronic newsletters, the Indiana Hunting & Trapping Guidebook, and the department's website. An additional three (3) hours of time will be needed in the first year to update the website, season quota, harvest reporting system, and email notifications. This will cost the department an estimated two hundred twenty-three dollars and fifty cents (\$223.50) for that first year. Administrative expenses imposed by the rules will be approximately five hundred ninety-six dollars (\$596) the first year the rules are effective.

c. Sources of Expenditures or Revenues Affected by the Rule – There will be no need for an additional appropriation from the General Assembly, and no changes in the distribution of revenue resulting from the rule changes. The work includes administrative tasks to provide public information about the proposed rule changes to the division of fish and wildlife (division) website, Indiana Hunting & Trapping Guidebook, notices to hunters, harvest reporting system, news releases, and emails. All of this work will be paid for out of the Fish and Wildlife Fund (39745) and is part of normal operating costs and

part of the regular course of business for the department. The anticipated effective date of the proposed rules is September 1, 2026, and the 2026 bobcat season will be impacted.

III. Impacted Parties

The proposed rule will affect approximately one thousand five hundred (1,500) licensed trappers and ten thousand eight hundred hunters (10,800). Landowners and other residents that have experienced damage from bobcats to their livestock will likely be helped indirectly by allowing bobcats to be taken in counties open during the season to take a bobcat.

IV. Changes in Proposed Rule

Subsection	Changes to the Rule	Reason for the Change
312 IAC 9-3-18.1(a)	Adds hunting as a method to take bobcats	Allow additional opportunities for taking bobcats
312 IAC 9-3-18.1(b)	Changes “trap” to “take” and adds lifetime hunting license types	Since hunting is now authorized, it’s a taking season instead of a trapping season and lifetime hunting licenses need to be allowed
312 IAC 9-3-18.1(c)	Adds bobcat license and hunting license types	Since hunting is now authorized, hunting license types need to be added as well as the bobcat license which is required in IC 14-22-12-1(a) to take a bobcat; IC 14-22-11-6 also requires a hunting license when hunting and IC 14-22-11-7 requires a trapping license when trapping.
312 IAC 9-3-18.1(d)	Removes “trapping”	Since hunting is now authorized, it is no longer a trapping season.
312 IAC 9-3-18.1(e)	Corrects reference to subsection for the bag limit	The individual bag limit has been moved to subsection (d)
312 IAC 9-3-18.1(f)	Changes “trap” to “take”	Since hunting is now authorized, the term “trap” needs to be changed to “take”
312 IAC 9-3-18.1(h)	Adds equipment that may be used to hunt a bobcat	Since hunting is now authorized, legal equipment needed to be added and is consistent with legal equipment for deer hunting
312 IAC 9-3-18.1(i)	Adds legal hunting hours	Since hunting is now authorized, legal hunting hours are needed and are the same as those for deer hunting in 312 IAC 9-3-2(t)
312 IAC 9-3-18.1 (j)	Removes the term “trapping” for the season and increases the statewide quota to 400 bobcats	Since hunting is now authorized, the term “trapping” needed to be removed and the number of bobcats is increased to allow for additional opportunities
312 IAC 9-3-18.1(k)	Corrects reference to subsection(l)	Since subsection (i) has been changed to subsection (l)

312 IAC 9-3-18.1(l)	Removes the term “trapping” for the season and changes “deliver” to “show”	Since hunting is now authorized, the term “trapping” needs to be removed. The term “deliver” has been changes since the skinned hide is shown to the department employee or checking station and returned back to the individual after the tag has been issued.
312 IAC 9-3-18.1(m)	Removes the term “trapping” for the season and changes subsection (i) to (l)	Since hunting is now authorized, the term trapping has been removed and subsection (i) has been changed to subsection (l)
312 IAC 9-3-18.1(n)	Removes the reference to federal law	Removes confusion and questions about compliance with federal requirements
312 IAC 9-3-18.1(p)	Changes “trap” to “take” and corrects references to other subsections	Since hunting is now authorized, the terms have been changed to remove the references to a trapping season
312 IAC 9-3-18.1(q)	Removes the reference to a trap that captures and immediately kills the bobcat, removes the word “trapping season” to “take” and corrects a reference to a subsection	Since hunting is now authorized, the reference to a trap and trapping season need to be removed. The subsections have been changed and the correction is needed as a result.
312 IAC 9-3-18.1(t)	Adds the restriction on the use of a dog to take or chase a bobcat	Eliminates concerns about hunters taking a large number of bobcats with the use of a dog before many trappers are able to trap them (provides for more equal opportunities).

312 IAC 9-3-18.1	Direct Effects	Indirect Effect	Fiscal Impact to DNR	Business Impacts
Allows taking a bobcat by hunting (in addition to trapping) and increases the statewide quota to four hundred (400) bobcats	<p>Allows additional opportunities for hunters</p> <p>By increasing the statewide quota, it gives hunters and trappers more opportunities to take a bobcat</p>	<p>Fur buyers may have access to additional bobcat pelts</p> <p>Taxidermists may have more bobcats to work on</p> <p>Landowners and other residents that have experienced damage from bobcats to their livestock will</p>	<p>One hundred eighty-four thousand five hundred dollars (\$184,500) revenue from the sale of licenses</p> <p>Five hundred ninety-six dollars (\$596) administrative costs</p>	<p>Fur buyers may have more bobcat pelts to buy and sell</p> <p>Taxidermists may have more bobcats to work on</p>

		likely be helped indirectly by allowing additional bobcats to be taken and use additional equipment		
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V. Benefit Analysis

a. Estimate of Primary and Direct Benefits of the Rule – The primary and direct benefits of the proposed rule are that hunters may now take bobcats in forty (40) counties in the state and may also sell hides and other parts of the bobcats. Additional bobcats may be taken by hunters or trappers with the increase in the statewide quota, giving hunters and trappers more opportunity to take a bobcat before the statewide quota is reached. A bobcat hide sells for approximately one hundred dollars (\$100) and the price can be higher depending upon the world market for hides. The department believes that most hunters and trappers that harvest their first bobcat in Indiana will keep the pelt (taxidermied or tanned). Based on a recent survey of trappers, thirty-eight percent (38%) sell the hides of wild animals that they trap. Therefore, using \$100 per hide x 152 (38% of the quota) will be sold, bringing in \$15,200 in revenue to hunters and trappers that decide to sell the hides.

b. Estimate of Secondary or Indirect Benefits of the Rule – Licensed fur buyers will be indirectly affected because they buy and sell bobcat hides and, depending on their location, may have more hides to sell. Licensed taxidermists may also see an increase in business. Bobcats legally harvested in other states are already allowed to be taxidermied, and taxidermists will likely see an increase initially when hunters or trappers harvest their first bobcat in the state. Indirect benefits are also to those who have livestock taken by bobcats by allowing additional equipment and allowing more bobcats to be taken. Trapping equipment vendors may see a slight increase in sales from trappers in the counties open to taking a bobcat with the increase in the statewide quota by obtaining some additional equipment and lures or baits to trap bobcats.

c. Estimate of Any Cost Savings to Regulated Industries – There will not be cost savings for hunters or trappers, the regulated industry, due to the proposed rule.

VI. Cost Analysis

The proposed rule changes do not require individuals or businesses to change behaviors. It is a voluntary decision whether to obtain a license to hunt or trap bobcats. The changes should not require regulated entities to purchase new equipment or software, dedicate additional time to completing tasks, hire workers, completing new training, establishing new procedures, providing additional information, or taking additional actions. The

regulations should not make it more difficult to enter the market, and do not increase the price of goods.

- a. Estimate of Compliance Costs for Regulated Entities** – Hunters and trappers who choose to take a bobcat will need a license under IC 14-22-12-1. A resident bobcat license costs fifteen dollars (\$15). Outside of the requirement to purchase a license as required by state law (IC 14-22-6-17), there are no new costs for regulated entities to comply with the proposed rule. Based on the department’s estimated projections for license sales in 2026, total compliance costs for a license for a resident would be approximately fifteen dollars (\$15) plus the cost of a hunting or trapping license (\$20), if necessary, for a total of thirty-five (\$35) per resident adult. Assuming that approximately one thousand five hundred (1,500) licensed trappers and ten thousand eight hundred hunters (10,800) may choose to take a bobcat, the estimated compliance costs to regulated entities equal approximately one hundred eighty-four thousand five hundred dollars to four hundred thirty thousand and five hundred dollars (if they didn’t already have a hunting or trapping license) (\$184,500 to \$430,500) each year. Again, these costs would be voluntarily-incurred and do not count against the rule.
- b. Estimate of Administrative Expenses Imposed by the Rules** – There are expected to be no new administrative expenses imposed by the rule, unless a hunter or trapper chooses to hunt or trap a bobcat, which will require the purchase of a license, a review of the laws to ensure compliance, and the time needed to take the carcass to a department checking station. There are no legal, consulting, reporting, or accounting fees imposed by the requirements of these rules.
- c. The fees, fines, and civil penalties analysis required by IC 4-22-2-19.6** – The proposed rule changes do not add or change a fee, fine, or civil penalty so an analysis is not required under IC 4-22-2-19.6.
- d. If the implementation costs of the proposed rule are expected to exceed the threshold set in IC 4-22-2-22.7(c)(6)** – The proposed rule changes do not have implementation or compliance costs that are expected to be at least one million dollars (\$1,000,000) over any two (2) year period for businesses, units, or individuals. Any costs associated with the proposed rule are expected to be well below the threshold set in IC 4-22-2-22.7(c)(6); between approximately one hundred eighty-four thousand five hundred dollars (\$184,500) and four hundred thirty thousand five hundred dollars (\$430,500).

VII. Sources of Information

- a. Independent Verifications or Studies** – The number of licensed hunters and trappers was obtained from the number of trappers that purchased a bobcat license in 2025, and the number of coyote hunters was obtained from a survey of license holders in 2021. The number of trappers that sold a hide was obtained from the 2024-2025 Indiana Trapper Survey. The bobcat habitat model (Figure 5) was developed by Purdue University.

Additional studies relied upon are as follows:

Jones LR, Johnson SA, Hudson CM, Zollner PA, Swihart RK (2022) Habitat selection in a recovering bobcat (*Lynx rufus*) population. PLoS ONE 17(8): e0269258. <https://doi.org/10.1371/journal.pone.0269258>

Jones, Landon R., Zollner, Patrick A., Swihart, Robert K., Godollei, Emily, Hudson, Cassie M. and Johnson, Scott A. Survival and Mortality Sources in a Recovering Population of Bobcats (*Lynx Rufus*) in South-central Indiana. *The American Midland Naturalist*. 184(2): 222-232

Knick, S. T. 1990. Ecology of bobcats relative to exploitation and a prey decline in southeastern Idaho. *Wildlife Monographs* **108**: 3–42.

Morrison, Erin. 2022. [Reproductive Rates, Kitten Survival, and Den Site Selection of Bobcats \(*Lynx Rufus*\) in the Black Hills, South Dakota](#), West Virginia Repository.

Kobilinsky, Dana. 2021. TWS2021: What affects bobcat kitten survival? *Wildlife News: The Wildlife Society*.

b. Sources Relied Upon in Determining and Calculating Costs and Benefits –

The division of fish and wildlife staff provided the benefits and costs of the interim rule.

VIII. Regulatory Analysis

Indiana Code 14-22-6-17 required the department to adopt rules to establish a season to take a bobcat not later than July 1, 2025. Trappers harvested the season quota of two hundred and fifty (250) bobcats in twenty-eight (28) days during the 2025 trapping season. With the proposed rule, hunters and trappers will be able to harvest up to four hundred (400) bobcats in the state, allowing them to sell their hides and parts.

Landowners and businesses who have experienced loss of domestic animals will continue to benefit from an expected reduction in the bobcat population with the opening of the season to take bobcats by trapping and hunting. The department believes that with the expected benefits for trappers, hunters, taxidermists (seven hundred (700) licensed in Indiana), and fur buyers (fifty (50) licensed in Indiana), additional revenue for the department with few administrative costs, the interim rule is warranted. The total estimated costs of the interim rule change is approximately five hundred ninety-six dollars (\$596) for the department. The benefits of the proposed rule outweigh the costs.

IX. Contact Information of Staff to Answer Substantive Questions

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[Text to be added by the Register]

First Notice of Public Comment Period [link to document with proposed rule]

LSA Document #XX-XXX

Notice of Determination Received: [date]