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footloosemontana.org

E: info@footloosemontana.org | P: 406 544 5727

June 4, 2026

Re: FWP seeking approval for hound hunting of mountain lions on the CMR and ULB refuges
Submitted via: https://fwp.mt.gov/aboutfwp/commission/june-2026-meeting

Dear FWP Commissioners,

Footloose Montana unequivocally opposes FWP's proposal to authorize hound hunting of mountain lions on the Charles M. Russell and UL Bend National Wildlife Refuges.

Between 2008 to 2026, hunters reportedly killed 8,617 mountain lions. Under the banner of "conservation," FWP continues to target mountain lions and other apex predators, including wolves and black bears from September through mid-April—and allows archery and rifle hunting, hound training, and the use of hounds to chase and tree lions before they are shot.

Mountain lions are a native keystone species in Montana and should be preserved. As top predators killed for trophies, mountain lions have sophisticated levels of intelligence, emotion, and sociality (Batavia et al. 2018). Killing mountain lions for sport, recreation, trophies and profit is a morally indefensible practice, constitutes frivolous killing, and commercializes wildlife—a clear violation of the North American Model of Wildlife Conservation.

Trophy hunting is causing social chaos among mountain lions, which none of FWP's population models or number estimate captures, yet it is a harsh reality for these animals. Scientific studies, including FWP's own research acknowledge the fact that trophy hunting disrupts the social fabric of mountain lion society, that killing mother lions exposes kittens to starvation and death by exposure and predation, and that killing older males increases infanticide and can lead to an *increase* in conflicts with humans. In other words, FWP's lethal management of mountain lions destroys sociality of mountain lions and likely causes most, if not all the problems the agency is often using as arguments to justify a hunting season of mountain lions publicly.

Yet, facts do not seem to matter to FWP or its Commission

In 2023, FWP had no mountain lion population estimate for Region 3 and casually applied the population estimate from the NW Region to Region 3 to extrapolate and guesstimate the number of mountain lions to set a quota. Despite the blatant absence of a reliable data, this Commission voted against Susan Brooke's sensible amendment of a more careful, reduced quota in Region 3, and *for* a 40% 'reduction' of the mountain lion population over six years in Region 1 – 4.

By making this decision, the Commission disregarded both the recommendations of the NW and CW Lion Ecoregional Population Objective Committees and the advice of FWP's own biologists. Those biologists identified a widening gap between kill numbers and quotas, especially since 2021, indicating that Montana's mountain lion population cannot sustain this level of hunting pressure and that continued aggressive quotas will intensify mortality in an already declining population.

As a result of the Commission's unscientific and ethically indefensible decision, trophy hunters killed mountain lions at record annual levels, and another 2,491 mountain lions lost their lives between 2021 and 2026. For what? But even this rate of killing spree has not satisfied FWP, which is now seeking to further expand mountain lion killing by proposing an additional hound-hunting season on Montana's largest wildlife refuge, the Charles M. Russell National Wildlife Refuge and the UL Bend national wildlife refuges—"refuges" in name only.

FWP maintains aggressive kill quota, and now wants to increase killing of mountain lions without a statewide population estimate:

In their May 26, 2026 response to Commissioner Susan Brooke, FWP stated: "At this time, we have not yet completed the resampling of any ecoregion, although the Northwest Ecoregion resampling is currently underway. Consequently, the department cannot conclusively state that any targeted reduction has yet been reached …" As in 2023, FWP still lacks a reliable population estimate, yet it is seeking an additional hound-hunting season that would even further increase mountain lion deaths—not only on public lands, but on two national wildlife refuges. The absurd contradiction is hard to overstate: dogs chase a mountain lion to exhaustion until s/he seeks "refuge" in a tree, only to be shot by a trophy hunter.

FWP wants to increase killing of mountain lions even though the agency has no population estimate for the East of MT, including the CMR and ULB wildlife refuges: As stated by FWP's mountain lion monitoring biologist, "We focus our monitoring program in the western three ecoregions where majority of the lion population is found. Trying to estimate using the same methods out east is difficult due to patchy lion habitat that limits our ability to extrapolate for broader abundance estimates."

Once again, FWP is proposing sweeping changes that would increase mountain lion deaths without providing reliable statewide population data. The agency also appears unable to determine how its aggressive kill quotas have affected mountain lion populations in the three western ecoregions, except in Ecoregion 2, where the population is declining. Without the results of the resampling, there remains a high and unacceptable level of uncertainty about how the Commission's 2023 mandate to reduce the mountain lion population by 40 percent over six years has already affected the species statewide. In the absence of reliable data, and especially given the increase in mountain lion poaching reported in Central Montana but likely occurring in all Montana, the precautionary principle should apply, and a moratorium on killing mountain lions should be imposed. Notably, even houndsmen have argued for years that the kill quotas are too high, and FWP's own biologists have warned that mountain lions cannot sustain this level of aggressive killing.

A Refuge in Name Only

A refuge should be a place of safety and protection—a place where vulnerable animals are sheltered from harm. Yet on these two "refuges," wildlife receives little refuge at all. Elk, deer, pronghorn, upland birds, waterfowl, black bears, coyotes, and many other species, including mountain lions, are routinely killed. Trapping also occurs on adjacent public lands throughout the region, a factor FWP generally ignores and specifically fails to account for in its mountain lion population modeling. FWP's incidental capture report shows that between 2012 and 2017, 99 mountain lions were caught in traps and snares set for other species; 67 died, and 32 were released, including some with foot injuries. The report further states that all mountain lions caught in snares died. FWP did not provide a breakdown of how many of the animals caught were females. The number of kittens that died from starvation, exposure, dehydration, or predation after their mothers were trapped or snared is unknown, but nevertheless a reality, e.g., we know anecdotally of an incident where a mountain lion mother in the Bitterroot was found strangled to death in a snare with her two kittens also dead at her feet.

How many female mountain lions nursing are getting shot by trophy hunters? How many kittens die as a result? How many of them will die as a result of FWP's proposal to kill even more mountain lions in 'wildlife refuges'? Who is keeping track? Who is monitoring this madness?

Not Hunters, Not Trappers, But Wildlife First!

The National Wildlife Refuge System was established first and foremost for wildlife conservation. The Charles M. Russell and UL Bend refuges provide essential habitat for pronghorn, mule deer, elk, bighorn sheep, mountain lions, black bears, migratory birds, and many other species. If any place on Montana's public lands should protect wild animals—including predators—from *recreational* killing, it is land designated as a National Wildlife

Refuge. Rather than expanding predator hunting, FWP and refuge managers should prioritize stronger protections for large carnivores and promote wildlife viewing, ecological education, photography, and other nonlethal forms of benign recreation.

There is no legitimate justification for an additional hound-hunting season on Montana's largest wildlife refuge other than killing mountain lions for frivolous reasons such as 'recreation.' Montana is already poised to maximize mountain lion deaths despite scientific evidence, professional expertise, and public opposition to this cruel policy. Disturbingly, the proposal reflects both the federal government's broader trend of handing over wildlife management to the states (a death sentence for the animals involved), and Montana's entrenched agenda of aggressively eliminating large carnivores.

"Stay the course!" Pushing Montana's large carnivores into extinction?

Neither scientific evidence nor public comment appears to influence how FWP and this Commission regard and manage mountain lions and other wildlife. Large carnivores—especially wolves, bears, and mountain lions—are treated less as essential parts of healthy ecosystems and more as obstacles to trophy hunting. Public opposition to trophy hunting and support for stronger wildlife protections likewise seem to carry little weight. What *does* seem to matter is the goal of exterminating Montana's large predators, especially wolves, bears and mountain lions. As 2023 Commissioner and trophy bear hunter, Brian Cebull stated: "… the main pressure was reduction of predators and increase in ungulates. The concept wasn't just targeting lions; it was black bears and wolves. Stay the course…"

The Public Trust

Wildlife belongs to all Americans, not solely to those who enjoy killing wild animals. Mountain lions have intrinsic worth, and their lives matter to them, their mates, and their young. They also provide significant ecological, educational, scientific, and aesthetic benefits. Among the most elusive and extraordinary animals on the North American landscape, mountain lions are valued by many people simply for continuing to exist. Most members of the public would prefer that these animals not be injured or killed, and that dependent kittens not be left to suffer and die after losing their only lifeline—their mother.

This Commission should recognize that wildlife watchers, photographers, hikers, conservationists, and future generations all have a legitimate stake in decisions about the treatment and future of publicly owned wildlife.

We urge the Commission to adopt Alternative B and reject the proposal to authorize hound hunting of mountain lions on the Charles M. Russell and UL Bend National Wildlife Refuges. FWP should also fulfill its stated duty as a steward of fish and wildlife by working with the Commission to end trapping and trophy hunting on Montana's wildlife refuges.

Sincerely,

Anja Heister, PhD

Co-founder & Executive Director of Footloose Montana

E: anja@footloosemontana.org | P: 406 544 5727