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footloosemontana.org

Lesley Robinson, Chair
Montana Fish and Wildlife Commission

Brian Wakeling, Game Management Bureau Chief
Montana Fish, Wildlife and Parks
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Submitted via email: fwcomm@mt.gov; brian.wakeling@mt.gov

RE: Proposed reductions of mountain lions in the Northwest Ecoregion 2023 through 2028 and in LMUs 100, 121, 122, 123, 124, 201, 202, 285 and 299.

Dear Chair Robinson, Chief Wakeling, and Members of the Commission:

Thank you for the opportunity to submit a comment on behalf of Footloose Montana and our thousands of supporters in Montana. We strongly oppose all four hunting quota alternatives proposed by FWP, each of which proposes a ‘reduction’ of the mountain lion population in our state. In addition, we reject any further increase of the quotas already in place in LMUs 100, 121—124, 201-202, 285 and 299.

Between 2007 and 2021, hunters have killed a total of nearly 7,000 mountain lions (6,926/4,321 males and 2,605 females). Under the guise of ‘conservation,’ mountain lions and other top predators such as wolves are relentlessly targeted by FWP and killed for recreation, sport, trophies and profit. Montana’s nearly eight-month-long mountain lion hunting season begins in September and ends in mid-April of the following year and includes the shooting of mountain lions with archery and rifles, a hound training season and the use of hounds to chase and tree the 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 may cause most, if not all the problems the agency is using as arguments to justify a hunting season of mountain lions publicly.

Comments:

Significant uncertainties regarding the statewide mountain lion population exist:

FWP refers to a population estimate that ranges between 2,784 to 5,156 animals. This is an estimate from 2010-2012 that is addressed in a 2014 UM research/FWP paper. This is in contrast to at least one scientific analysis of Montana’s habitat areas and known density rates for mountain lions that puts their likely population between 2,112 and 3,258 (Mountain Lion Foundation/Montana).

- FWP possibly overestimates the state’s mountain lion population, at a very minimum, these numbers are outdated, and not representative of the current reality, especially given the risks from climate change (drought, extreme temperatures, flooding, fire, etc. affecting all wildlife). In addition, Montana has experienced significant growth of its human population in recent years, an increase that has reduced habitat availability and quality for many wildlife species, including mountain lions and their prey species.
- The estimate of the mountain lion population in the Northwestern Ecoregion is 1,376 individuals. Even the LEPOC 2022 recognized the problem with this assumed population number and stated:

“There is uncertainty in the lion population estimate. This makes it difficult to precisely prescribe lion harvest rates. There are concerns that snaring of other predators impacts lions (FWP can pull together data, but there is a lot of uncertainty about the level of underreporting)” (p.35)

<https://fwp.mt.gov/binaries/content/assets/fwp/commission/2022/jun-23/mountain-lion-quota/nw-lepoc-2022-final.pdf>

The sentence in parenthesis above implies that FWP does not consider traps and snares as sources of mortality in their modeling of the mountain lion numbers, nor in the modeling of the four alternatives to reduce the mountain lion population in the Northwest Ecoregion/LMUs. Yet, FWP's incidental capture report shows that 99 mountain lions were caught in traps and snares set for other species between 2012 and 2017; 67 mountain lions died, and 32 were released (17% with foot injuries). The report noted that "all mountain lions caught in snares died." FWP did not provide a further breakdown of how many females were affected. The number of kittens that died of starvation, exposure, dehydration, and predation as a consequence of indiscriminate trapping and snaring is unknown, yet it is 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.)

Trophy hunting destroys the social fabric of mountain lion society:

Mountain lions are quite social and live in 'communities' with females sharing carcasses with other females, while male mountain lions may protect their females, kittens, and territory from incoming, competing males. Hunting can cause social chaos within cougar populations by disrupting these communities, which increases intra-species conflicts. Destabilization of mountain lion populations causes increased conflicts with humans, pets, and livestock (Peebles et al. 2013).

FWP's own 2011 study addresses the destructive impacts of hunting on the social structure of mountain lions and notes, "... harvest may disrupt the social structure of males and their ability to define and defend exclusive home ranges" (Robinson and DeSimone, "The Garnet Mountain Lion Study: Characteristics of a hunted population in West-Central Montana," 2011, p. 16). Today, consensus in the scientific literature exists that killing dominant territorial male mountain lions from a population has multiple destructive consequences, including:

- An increase in intra-species competition for mates and territory.
- Provides openings for juveniles and subadults to move into their territory leading to greater aggression between mountain lions and mortalities to females and subsequent infanticide—the killing of unrelated offspring.

For decades, FWP has used the same arguments of population control and decreasing human-lion conflicts (mainly depredation) to justify the alleged need for a hunting season for mountain lions while providing no evidence of its effectiveness to support either. Once again, these claims are contrary to scientific studies that show a positive association between hunting mountain lions and an increase of complaints and depredation, for example:

- Hunting destroys the sex structure and shifts a population towards younger males, who are less experienced and much more likely to engage in conflicts and depredations than mountain lions in a stable population with older mountain lions present. Research by Robert Wielgus has shown that killing adult males increased cougar sightings (often perceived as a ‘conflict’) and also the number of cattle and sheep killed by other mountain lions, as inexperienced younger males moved into the older males’ territory.
- Research by Peebles et al. (2013) has found that,

“... each additional cougar on the landscape increased the odds of a complaint of livestock depredation by about 5 %. However, contrary to expectations, each additional cougar killed on the landscape increased the odds by about 50% ... Very heavy hunting (100% removal of residents adults in 1 year) increased the odds of complaints and depredation in year 2 by 150% to 340% (p. 6).

- A study in Washington state showed that an increase in complaints, including sightings and predations, both of which was assumed to reflect a ‘rapidly growing mountain lion population,’ which prompted an increase in hunting mountain lions was in reality a result of a declining female and increasing male demographic in the population (Robinson et al. 2008 cited in Peebles et al. 2013). Heavy hunting of mountain lions skewed the ratio of young males in the population by causing compensatory immigration and emigration by young male cougars (Teichman et al. 2016).

FWP’s 2019 report notes that mountain lion attacks on humans are extremely rare, with the only fatal attack occurring in 1989. Non-fatal attacks (mostly involving children and pets) are also rare (though one known recent incident involved a dog getting killed by a mountain lion in Missoula’s Rattlesnake Valley in 2022). The same report notes that “Juvenile and subadult mountain lions are responsible for most human-lion conflicts across the western U. S. (Mattson 2007), including Montana” (Montana Mountain Lion: Monitoring, Management and Strategy 2019, p. 24). Once again, FWP’s own research provides further support for the link between trophy hunting of mountain lions causing social chaos and leading to an *increase* in conflicts involving mountain lions. Instead of intensifying the killing of mountain lions, FWP should do a better job in educating the public on safety issues and how to foster respect for living with predators.

Mountain lion females, mothers and kittens are frequent victims of trophy hunters and hounds men.

FWP’s trophy hunting also cruelly affects mountain lion mothers and their kittens. Researchers report that in heavily hunted populations, female mountain lions experience higher levels of intraspecific aggression (fights with other individual lions), resulting in predation on

themselves and their kittens (Stoner et al. 2013). As mountain lions give birth year-round, ‘sportsmen’ kill pregnant mountain lions. In addition, killing mountain lion mothers causes the death of orphaned kittens by starvation, dehydration, exposure to extreme temperatures, and predation (O’Malley et al., Wildlife Society Bulletin, 2018).

Hound hunting lacks the “fair chase” component valued in other types of hunting and is animal cruelty whereby hounds, often mistreated themselves, kill mountain lion kittens, and often get injured or even killed by mountain lions and/or other predators. Hound hunting is not only harmful to dogs but also energetically taxing and stressful to mountain lions (Harlow et al. 1992).

Hunting of mountain lions is unnecessary for ‘population control’:

Mountain lions are a self-regulating species, “which means they control their own population size in balance with the ecosystem without the need for human intervention” (Mountain Lion Foundation). Cougars require large expansive swaths of habitat with individuals maintaining large home ranges (they can range from 25-500 square miles) that overlap with one another; mountain lions occur at low densities relative to their primary prey and must remain at a smaller size relative to their prey’s biomass to survive, thus when prey populations decline so do mountain lion populations.

Hunting detrimentally impacts the ecological function of mountain lions:

Mountain lions are a keystone species and drive the ecosystems in which they live. As top predators, they regulate many of the other species in their communities, including herbivores who then regulate the plant community. Research shows the essential role that cougars play for maintaining biodiversity, e.g., the “trophic cascade effect.” Also, a study in Zion National Park demonstrated that in areas where mountain lion numbers are low, the population of mule deer increases significantly, which limits the growth of cottonwood trees, shrubs, and wildflowers. Subsequently, these plants no longer provide habitat and food for butterflies and other insects, frogs, and lizards (Ripple and Beschta 2006). In addition, mountain lions can help maintain the health and viability of their prey species by preying on the sick ungulates, thereby reducing the risk of spreading diseases. Thus, a reduction of mountain lion populations in Montana could backfire by eliminating the best defense against diseases increasing among ungulates, including chronic wasting disease.

Composition of the Northwest LEPOC is problematic:

FWP represents sportsmen interests and is an agency that must sell mountain lion hunting licenses to help guarantee its relevance and survival. Any ‘problem’ identifications, setting of quotas, and questions regarding how drastically Montana’s mountain lion population should be

reduced stem from this focus and determines FWP's objectives, e.g., "maximizing hunter satisfaction" and "maximize social acceptance of lion hunting" (instead of educating the public about the value of mountain lions and how to manage human-lion conflicts non-lethally).

The members of the LEPOC seemed to have been handpicked by a FWP Team (they were recommended to the director) and couldn't have been less diverse in ethnicity, gender, and values (an overwhelming dominance of white male trophy-hunting and outfitter interests). This 'advisory' group is now recommending a 12.5 percent reduction of the mountain lion population in the Northwest Ecoregion and further reductions in nine LMUs. The 'stable' and 'increase' options quickly discarded, this leaves the public only one 'reduction' alternative to choose from—a 10 percent, 12.5, 20 or 40 percent (!) reduction. Not only is the goal of reducing the mountain lion population self-serving, but the claims by members of the LEPOC to support the alleged need to increase the quotas on mountain lions (which soon will be followed by claims to increase quotas on other predators), are based on pre-determined beliefs and hunting interests, rather than science and the interests of the majority of the public.

FWP continues its relentless and unjustified focus on killing predators in Montana, contradicting the agency's own research findings and conclusion: "Weather and forage availability are more likely than predation to explain chronically low ungulate populations. The influence of these potentially limiting factors should be evaluated before predation [of ungulates] is implicated" (Montana Mountain Lion 2019, p. 17).

And now that a recent Montana study has shown that hunting of mountain lions does not increase elk demographic in the short-term and that in fact, "sustained harvest treatments would be necessary to achieve longer-term elk population demographic responses," (Proffitt et al. 2020), FWP is proposing a multiple-year strategy of increased hunting of mountain lions to achieve the desired increase in elk population. At the same time, FWP's 2022 data on its elk count shows that Region 1 is meeting its objective.

Clearly, hunting presents a major contributor of mortality for ungulates such as mule deer, elk, and deer. Instead of increasing the hunting and quotas of mountain lions, FWP should consider reducing hunting permits and quotas of these ungulates and shift their focus away from their war against predators, starting by eliminating the already excessive trophy hunting of predators such as wolves, bears and mountain lions.

FWP should shift to a holistic approach to ecosystem management with mountain lions as an important, integral part. Most human-caused conflicts with mountain lions, including predation, should be solved with non-lethal methods, and killing individual 'problem' mountain lions should be the last resort. For these and other reasons provided below, we do not support a mountain lion hunting season or any of the proposed quota increases to reduce the number of

mountain lions in the Northwest Ecoregion and LMUs listed above. We believe mountain lions should not be managed exclusively for trophy hunters but on behalf of all Montanans. We call on FWP to end trophy hunting of mountain lions in our state.

Thank you for your consideration.

Sincerely,

Anja Heister, PhD on behalf of the Footloose Montana Board

Literature cited:

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