

Board of Directors

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July 21, 2008

New Mexico Department of Game & Fish  
c/o Wildlife Management Division  
1 Wildlife Way  
Santa Fe, New Mexico 87504

Dear Director,

The Cougar Fund, a national nonprofit dedicated to the conservation of the cougar throughout its present and historic range, works on behalf of its members to ensure that cougar management, as well as management of their prey, are always held to the highest standards of peer-reviewed science. In addition to educating the public about the many issues that surround cougars, we look to balance human interests with healthy cougar populations. With these efforts in mind, the Cougar Fund would like to ask the state of New Mexico to re-evaluate the section of the Big Game Management plan regarding cougars.

The Cougar Fund fails to find scientific evidence that supports increasing harvest limits in section 29, 30 & 31.

As is becoming standard in other states, the Cougar Fund strongly suggests that all cougar mortalities be included in "the quota". If all known human caused cougar mortalities including natural mortalities, accidental deaths and those due to control actions by the Department are not included in filling quotas, then there is an increased potential to substantially reduce newly established cougar populations. Counting all human-caused mortalities towards the quotas appropriately implies a higher degree of accountability on the part of the public and the Department.

Although regulations clearly state that a hunter may not take kittens, your definition of kittens as "lions with visible spots" is not sufficient. Kitten spots fade by 9 months, leaving less discernable marks. Additionally, limiting kills of a female with kittens at side is not enough. It is important to note that mothers often leave their young in the den while they hunt. "Although most states that allow puma hunting attempt to protect mothers by outlawing the killing of females with cubs at their sides" (Logan and Sweanor 2000), this does not prevent their killing. Puma mothers are susceptible to harvest when they are not accompanied by their cubs. Research in Wyoming showed that during the winter hunting season, mothers were away from their cubs about 50% of the time that researchers

with dogs encountered them (Logan 1983). More so, researchers studying pumas in Utah found that cub tracks were found with their mothers only 25% of the time; they concluded that 75% of mothers would not be recognized by hunters (Barnhurst and Linzey 1989). Since as many as three out four adult females may be raising cubs each year, it is possible that roughly 38% – 56% of adult females killed by hunters each year are mothers with dependent cubs.” (Desert Puma, Logan and Sweanor, 2001). The Cougar Fund recommends that NMG&F establish female sub-quotas to protect the new cougar population, and to provide photos of older kittens on your website to avoid further inadvertent kills.

As an immediate step, we recommend NDGF educate hunters so they can identify the sex of a cougar prior to the kill. We readily offer our assistance in this effort with photos and documentation we have already created on our website [www.cougarfund.org](http://www.cougarfund.org). This will save NMG&F time and funding. We also recommend that the Department create an online Cougar Education and Identification course, similar to the one posted on the Colorado Division of Wildlife website located at <http://wildlife.state.co.us/Hunting/HunterEducation/MtnLionEduc/>. Creating this online course would be quick and easy, utilizing the materials already produced by the state of Colorado.

Killing cougars in efforts to increase or maintain human safety is neither productive, nor scientifically justified and regarded by many other western states as an unrealistic and archaic form of game management. Cougars are a self-regulating species, determined by food, habitat and social order. The expansive killing of cougars not only increases the proportion of transient males in the population – an age and gender that has been shown to be disproportionately involved in depredation incidents – but may actually lead to increased litter sizes, since as population numbers decrease, reproductive rates are known to increase.

Sincerely,



Sara L. Carlson  
Director of Programs

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