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May 12, 2010

Montana Fish, Wildlife & Parks Department, Wildlife Bureau
Attn: Public Comment
Post Office Box 200701
Helena, MT 59620-0701

Dear MFW&P Commissioners,

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 comment on proposed changes to the 2010 Mountain Lion quotas adopted by the FWP Commission at its April 8, 2010 meeting. Overall, the Cougar Fund fails to find scientific evidence that supports the need for the proposed increase in quota.

We are extremely concerned to see an exceptionally high quota increase that is not evenly distributed across the state – specifically a 72% increase in Hunting Region 2. In addition, we believe that not including all mortalities in the quota increases the potential to substantially alter populations. Including all mortalities increases accountability on the part of the public, as well as the Department, and is becoming the trend in states that use progressive and modern management techniques.

Looking at the history of cougar management in the state of Montana, we have seen what happens when a population is over-hunted, which is why we must insist on seeing more scientific evidence to support a quota increase. FWP biologists have been studying mountain lions in Montana for over ten-years. We believe it is time this information was used to develop a better quality management plan for the state.

Research conducted in the state of Montana has shown that hunted cougar populations tend to be younger, have fewer males and take longer to recover from declines than once thought. To ensure healthy populations in the state, we would like to see data on how

many animals inhabit a hunting area and whether numbers are rising, falling, or remaining stable from year to year. We would also like to see data that reflect hunter and houndsmen observations. With this data we hope to better understand Montana cougar population density and trends. Lastly we would like to see statistical analysis and comprehensive peer review of that data.

If the state's reasons for increasing the quota are because cougars are seen as a threat to public safety, or threaten hunting opportunities for other species, we ask you to keep in mind that enacting the following would be a better alternative to the State spending valuable resources on a reactionary policy. We recommend that the state increase, or continue to:

- *Increase public awareness and education about living in cougar country.*
- *Encourage appropriate land-use planning.*
- *Promote improved animal husbandry techniques.*
- *Hold farmers and ranchers accountable for ignoring ways to reduce or prevent predation.*

The Cougar Fund would also like to reiterate that killing mountain lions to increase or maintain human and livestock safety not scientifically proven, productive and regarded by many other western states as an unrealistic and archaic form of game management.

As I'm sure you are well aware of, 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 young males in the population – an age and gender that has been shown to be disproportionately involved in depredation incidents.

Thank you for considering these comments and the Cougar Fund is always available to answer questions or provide data.

Sincerely,

Sara L. Carlson
Director of Programs