

MONTANA FISH, WILDLIFE and PARKS
PUBLIC COMMENT
MOUNTAIN LION STRUCTURE

From: [Jeff Herbert](#)
To: commissionerregion1@mtfwp.org; commissionerregion2@mtfwp.org; commissionerregion3@mtfwp.org; KC Walsh; commissionerregion5@mtfwp.org; commissionerregion6@mtfwp.org; commissionerregion7@mtfwp.org
Cc: [FWP Wildlife](#)
Subject: [EXTERNAL] Montana Sportsmen Alliance Comments Lion Hunting Regulations
Date: Friday, March 11, 2022 10:58:25 AM
Attachments: [MSA Comments 2022 Lion Season.docx](#)

Chair Robinson, Vice-Chair Tabor, Commissioners: Byorth, Cebull, Lane, Waller and Walsh,

MSA respectfully submits the attached comments for public record as they relate to the proposed 2022-23 mountain lion hunting regulations. Thank you.

Montana Sportsmen Alliance Leadership Group

Joe Perry - Brady
John Borgreen - Gt Falls
Don Thomas - Lewistown
Doug Krings - Lewistown
Steve Schindler - Glasgow
Andrew McKean - Glasgow
Dale Tribby - Miles City
JW Westman - Park City
Jeff Herbert - Helena
Ray Gross = Dillon
Tim Thier - Eureka

March 10, 2022

Montana Fish & Wildlife Commission
MT FWP
PO Box 200701
Helena, MT 59620

Dear Chair Robinson, Vice-Chair Tabor, Commissioners: Byorth, Cebull, Lane, Waller and Walsh,

Montana Sportsmen Alliance, representing resident hunters, anglers and conservationists, appreciates the opportunity to provide public comment on the proposed 2022 Mountain Lion Hunting Regulations. Unfortunately, that public comment has been significantly constrained by the Department's decision to seek input on only a single option after Commission action endorsed three options for consideration. Furthermore, the way in which the on-line public comment is being solicited provides no opportunity to either oppose the proposal or speak to other options including the current season types. This appears to be another deliberate attempt to reduce public involvement and railroad a decision. In the eyes of the public, the credibility of the Department and the Commission are again being compromised when decisions are made in this fashion. For these reasons, as well as those noted below, MSA opposes the implementation of Option 3 and endorses a continuation of the existing season structures in the different regions.

Houndsmen and hunters consider this large carnivore a challenging species to pursue and highly value those opportunities. In fact, many in that community have worked tirelessly to help develop and tweak regulations appropriate to their region. These groups have included the full spectrum of interested stakeholders and those regulations reflect differences in lion habitat and numbers, hunting pressure and snow conditions. To offer a single statewide season type, albeit a confusing one at best, that ignores local efforts to manage the quality and quantity of the lion harvest is inexcusable. From our conversations with lion hunters across the state, there is very little support for this approach. In fact, to offer a single season type that results in greater commercialization in the harvest of that resource is an obvious conflict of interest and an infringement of the public trust. We can and should do better. This is Montana.

Montana Sportsmen Alliance Leadership Group

From: [BOB WIESNER](#)
To: [FWP Wildlife](#)
Subject: [EXTERNAL] MFWP - Mountain Lion Proposals 3-17-2022
Date: Thursday, March 17, 2022 5:08:53 PM
Attachments: [MFWP Lion Comments for Commission.docx](#)

Attached are my comments for the MFWP Commissioners

Thank you for considering my comments.

Bob Wiesner, Missoula, MT. 406-552-3615

Public Comment: Mountain Lion Proposals 3-17-2022

Bob Wiesner, Missoula, MT bwmsla@msn.com 406-552-3615

To: Montana Fish and Wildlife Commissioners

Thank you for considering my comments.

I began treeing lions in Lolo Creek with a borrowed hound in 1972 and bought my first hound in 1973 – 50 years ago. I have participated in this endeavor as a sport hunter, an outfitter-guide, as a researcher to assist scientists and as a specialist for MFWP managers and biologists. I feel privileged to have worked with mountain lions through this time. The passion I have for mountain lions and their management has not diminished over time. I am currently training a young hound currently and look forward to another season with her when the snow flies. I am trying to become more effective at this craft but the goal keeps moving and hopefully I will too.

In Montana, over the years there have been many changes to the regulations associated with the management of mountain lions. The season structure changes proposed by the current MFWP Commission are the largest I have personally observed. The comments I offer are intended for Region 2 only and represent my own ideas. I do not represent an organization nor agency.

In Region 2, I support the continuation of the present season structure, the status quo, even though there were originally 3 proposals made by the Commission which later changed to the Commission wanting comments on only the 3rd proposal. I feel the present season structure best serves the needs of the sport hunters, outfitters, guides and most importantly the conservation of mountain lions in viable numbers for all consumptive and non-consumptive enthusiasts.

Further comments:

1. I am opposed to a special limited license which makes it valid regardless of harvest status relative to quota. When the quota fills, all harvest should end in that LMU. Quota over-runs are detrimental to the management of lions and offer a foothold for contention of those opposed to the sport hunting of lions.
2. I have concern over “clustering” LMUs and how the management of Special Limited License and the Unlimited License would exist for the management to structure quota numbers and ensure an equitable harvest over each LMU.
3. I support the 10% non-resident quota for non-resident hunters.
4. In Region 2 we have worked hard to create a management scheme which includes the harvest of lions in the early fall with archery, the general firearms season, the early portion of the winter season and the late winter season. This structure also utilizes a quota and sub-quota component which is compatible for the perpetuation of healthy lion populations.

From: [Haley Stewart](#)
To: [FWP Wildlife](#)
Subject: [EXTERNAL] Comments regarding the 2022 mountain lion hunting season structure proposal
Date: Wednesday, March 16, 2022 2:26:21 PM
Attachments: [HSUS 2022 mountain lion hunting proposal 03.22.pdf](#)

Greetings,

I am submitting the attached comments regarding the proposed mountain lion season structure. Please do not hesitate to reach out if you have any questions. Thank you so much for your consideration.

Sincerely,
Haley

Haley Stewart
Program Manager, Wildlife Protection
Pronouns: she/her/hers

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At HSUS we work flexibly. While it suits me to email now, I do not expect a response outside your normal work hours.



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March 16, 2022

Lesley Robinson, Chair
Montana Fish & Wildlife Commission
P.O. Box 200701
Helena, MT 59620-0701

Brian Wakeling, Game Management Bureau Chief
Montana Fish, Wildlife and Parks
P.O. Box 200701
Helena, MT 59620-0701

Submitted via email: fwpwld@mt.gov

RE: 2022 Mountain Lion Hunting Season Structure Proposal

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

On behalf of the Humane Society of the United States (HSUS) and our Montana supporters, I thank you for the opportunity to submit comments on Montana Fish, Wildlife and Parks' (FWP) proposed 2022 mountain lion hunting season structure.

The HSUS is opposed to the use of special limited licenses for mountain lion hunting, as these would allow for the killing of lions even after hunters have reached a region's quota. Quotas set for mountain lions must not exceed sustainable levels, generally thought to be 14% of the adult population.¹ As detailed in the appendix that follows, exceeding a quota can have negative impacts on a mountain lion population as well as on human communities, leading to increased conflicts with humans, pets, and livestock.² In 2020, hunters already killed what could be upwards of 17% of the statewide population,³ a rate that is not considered sustainable by the best available science.⁴

FWP must work to reduce excessive killing of mountain lions. The HSUS is concerned by the high rates of mountain lion offtake in Montana, particularly its high levels of female quotas, as well as FWP's justification for allowing the hunting of mountain lions in order to boost ungulate populations and decrease conflicts. Between 2010 and 2020, hunters have killed 5,385 mountain lions in Montana.

We believe mountain lions should be managed for all Montanans, as Montana's mountain lions are an important component of our natural wild heritage and deserve reasoned management so that their populations are conserved for future generations.⁵ As such, and for the reasons provided in the appendix below, we do not support the 2022 mountain lion hunting season structure proposal and call on FWP to end hunting of mountain lions in Montana. Thank you for your consideration.

Sincerely,

Haley Stewart
Program Manager, Wildlife Protection

Appendix

I. Trophy hunting is harmful to mountain lions and increases conflicts

Trophy hunting is the greatest source of mortality for mountain lions throughout the majority of their range across the western and midwestern United States.⁶ The practice is harmful to more than just the wild cats who are killed. Conservation biologists have derided this practice as unnecessary and wasteful. Batavia et al. (2018) write that compelling evidence shows the animals hunted as trophies have sophisticated levels of “intelligence, emotion and sociality,” which is “profoundly disrupted” by trophy hunting.⁷ For the following reasons, FWP must not allow trophy hunting of mountain lions in our state:

1.) *Trophy hunting is unsustainable and cruel:* Mountain lions are sparsely populated across vast areas, invest in few offspring, provide extended parental care to their young, have a tendency towards infanticide, females limit reproduction and social stability promotes their resiliency.⁸ Human persecution affects their social structure⁹ and harms their persistence.¹⁰

Research shows that trophy hunting and predator control result in additive mortalities, causing total mortalities to far exceed what would occur in nature.¹¹ In fact, the effect of human persecution of large carnivores is “super additive,” meaning that hunter kill rates have a multiplier effect on total mortality over what would occur in nature, due to breeder loss, social disruption and its indirect effects including increased infanticide and decreased recruitment of their young.¹² When trophy hunters and predator-control agents remove the stable adult mountain lions from a population, it encourages subadult males to immigrate, leading to greater aggression between cats and mortalities to adult females and subsequent infanticide.¹³

2.) *Trophy hunting and predator control is particularly harmful to mountain lion kittens and their mothers:* Biologists maintain that females are the most important demographic of a lion population; they ensure the continuation of the species.¹⁴ Unfortunately, female mountain lions are frequent victims of trophy hunting, both directly from the trophy hunter, and indirectly from social chaos.¹⁵ In heavily hunted populations, female mountain lions experience higher levels of intraspecific aggression (fights with other cats) resulting in predation on themselves and their kittens.¹⁶ Over-hunting harms a population’s ability to recruit new members, especially if too many adult females are removed.¹⁷ The loss of adult females ensures the death of orphaned kittens by starvation, dehydration, predation or exposure.¹⁸ Kittens up to 12 months of age are likely incapable of dispatching prey animals on their own.¹⁹ Thus, a trophy hunter or trapper kills more than just the animal in the crosshairs. Trophy hunting causes a sudden disruption in mountain lion social structures that leads to additional mortalities that are never counted in states’ hunting quotas.²⁰

3.) *Trophy hunting harms entire mountain lion communities:* A study on mountain lions in the Teton region of Wyoming shows that mountain lions are quite social and live in “communities,” with females sharing kills with other females and territorial males, while males may protect their females and kittens from incoming, competing males.²¹ Disrupting these communities can cause negative effects and increases conflicts by causing social chaos within their populations.²² Trophy hunting and predator control easily destabilize mountain lion populations, causing increased conflicts with humans, pets and livestock.²³

4.) *Trophy hunting is unnecessary as mountain lions are a self-regulating species:* Mountain lions occur at low densities relative to their primary prey, making them sensitive to bottom-up (prey declines) and top-down (human persecution) influences.²⁴ In order to survive, their populations must stay at a smaller size relative to their prey's biomass or risk starvation.²⁵ They do this by regulating their own numbers.²⁶ When prey populations decline, so do mountain lion populations.²⁷ Mountain lion populations also require expansive habitat, with individual cats maintaining large home ranges that overlap with one another.²⁸

5.) *Trophy hunting increases complaints and livestock depredations:* Data show that mountain lions kill very few cattle and sheep across the country.²⁹ In Montana, mountain lions cause less than 1% of all cattle and sheep mortalities.³⁰ Moreover, only 14.5% of cattle operations reportedly used non-lethal methods to protect their animals from predation.³¹

A Washington state study shows that as mountain lion complaints increased, wildlife officials lengthened seasons and increased bag limits to respond to what they believed was a rapidly growing lion population. However, the public's perception of an increasing population and greater numbers of livestock losses was actually a result of a declining female and increasing male demographic in the population.³² Heavy hunting of lions skewed the ratio of young males in the population by causing compensatory immigration and emigration by young male lions.³³

Study authors found that the sport hunting of mountain lions to reduce complaints and livestock depredations had the opposite effect. Killing lions disrupts their social structure and increases both complaints and livestock depredations.³⁴ Peebles et al. (2013) write:

... 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%, or an order of magnitude higher. By far, hunting of cougars had the greatest effects, but not as expected. Very heavy hunting (100% removal of resident adults in 1 year) increased the odds of complaints and depredations in year 2 by 150% to 340%.³⁵

Hunting disrupts mountain lions' sex-age structure and tilts a population to one that is composed of younger males, who are more likely to engage in livestock losses than animals in a stable, older population.³⁶

6.) *Killing large numbers of mountain lions halts their ability to create trophic cascades in their Montana ecosystems, which benefits a wide range of flora, fauna and people:* Mountain lions serve important ecological roles, including providing a variety of ecosystem services.³⁷ As such, conserving these large cats on the landscape creates a socio-ecological benefit that far offsets any societal costs.³⁸ Their protection and conservation have ripple effects throughout their natural communities. Researchers have found that by modulating deer populations, mountain lions prevented overgrazing near fragile riparian systems, resulting in greater biodiversity.³⁹ Additionally, carrion left from lion kills feeds scavengers, beetles, foxes, bears and other wildlife species, further enhancing biodiversity.⁴⁰

Mountain lions, as with most large carnivores, are also considered a keystone species because they help drive the ecosystems in which they live.⁴¹ As a large predator, mountain lions regulate many of the other species in their communities, including herbivores, who then regulate the plant community.⁴²

Wildlife managers and biologists also consider mountain lions to be an ‘umbrella’ species – by protecting lions and their large habitat, a wide array of additional plants and animals in this habitat will also be protected.⁴³

7.) *Mountain lions remove deer infected with chronic wasting disease:* Mountain lions can help maintain the health and viability of ungulate populations by preying on sick individuals, reducing the spread of disease. For example, in a study in Rocky Mountain National Park, researchers found lions preyed on mule deer infected with chronic wasting disease—which was found in Montana’s wild deer herd in 2017, and just found late last year in Montana’s wild elk herd.⁴⁴ A reduction in the lion population could eliminate one of the best defenses against the spread of this deadly disease. Mountain lions also reduce vehicle collisions with deer, saving drivers \$1.1 million in collision costs annually in South Dakota alone.⁴⁵ They could also help prevent the need for game damage hunts in the winter.⁴⁶

8.) *Mountain lions provide economic benefits through tourism:* Killing mountain lions deprives citizens of their ability to view or photograph wild mountain lions.⁴⁷ Nonconsumptive users are a rapidly growing stakeholder group who provide immense economic contributions to the communities in which they visit.⁴⁸ A 2018 study co-sponsored by the Western Association of Fish and Wildlife Agencies, Manfredo et al. (2018), found that more Montanans value and appreciate wildlife than ever.⁴⁹ Fewer of us Montanans want wildlife, such as grizzly bears, wolves and mountain lions killed for utilitarian purposes.⁵⁰

9.) *Hound hunting harms mountain lion kittens, non-target wildlife and the hounds themselves:* Trophy hunting with hounds is cruel and causes harm to more than just the mountain lions being chased. Hounds kill kittens, and lions often injure or kill hounds.⁵¹ The practice is stressful and energetically taxing to lions.⁵² Hound hunting is not considered “fair chase” hunting by most.⁵³ Additionally, hounds chase non-target wildlife and trespass onto private lands.⁵⁴

If FWP is to continue allowing trophy hunting of mountain lions, it must at the very least ensure that mortality from human persecution not exceed the species’ sustainable rate of growth, thought to be approximately 12% to 14% of the population.⁵⁵ FWP currently allows practically unlimited trophy hunting of mountain lions, despite lacking a statewide population estimate. Even so, the 2020 lion mortality total of 462 cats could be upwards of 17% of the statewide population, based on a modeling study by Robinson et al. (2015), which places the statewide population at 2,784 to 5,156 cats.⁵⁶ This rate is not considered sustainable by the best available science.⁵⁷

II. Killing mountain lions to increase mule deer populations is unlikely to produce positive results.

FWP has repeatedly claimed ungulate predation reduction as a justification for permitting trophy hunting of mountain lions. The most current and best available science on mule deer survival reflects two key points:

1.) *Because ecological systems are complex, heavily persecuting mountain lions will fail to address the underlying malnutrition problems that deer face:* Recent studies demonstrate that predator removal actions “generally had no effect” in the long term on ungulate populations.⁵⁸ Authors found that “both coyote and mountain lion predation was compensatory rather than additive.”⁵⁹ In other

words, if predators had been absent from those ecosystems, the deer would have died from some other cause anyway. In Idaho, study areas where mountain lions and coyotes endured heavy-killing regimens, the massive amounts of native carnivore killing failed to change the population trends for mule deer. Hurley et al. (2011) conclude that the benefits of predator killing are marginal and short term in nature, and more importantly, the killing failed to change the long-term dynamics of the mule deer population.⁶⁰

Bishop et al. (2009), in their long-term, Colorado-based study, found that food limited the deer population, but it was especially influenced by the quality of winter-range habitats.⁶¹ They determined that if deer had access to adequate nutrition that neither mountain lions nor coyotes negatively affected the deer population. They also suggest that mountain lions selected for deer that had poor body condition.⁶² In a follow up, Colorado-based study, Bergman et al. (2014) found that managing winter range for deer, weed control and reseeding benefitted deer greatly.⁶³ While predators are limited by the number of prey,⁶⁴ a new metadata study reveals that an increase in the number of prey does not bring a proportional increase in predators because in crowded ungulate systems, the number of offspring is low. Thus, predator populations stay at a much lower size relative to prey biomass than previously thought.⁶⁵

2.) *Mule deer need adequate nutrition to survive, reproduce, and recruit new members to their population:* Mule deer populations in the western United States have experienced population declines over the latter part of the last century because of myriad factors including habitat loss or fragmentation, changes in forage quality, competition with other ungulates, predation, disease, increased hunting, poaching, stochastic weather events, fire suppression, noxious weeds, overgrazing by livestock, energy development, and changes in hydrology caused by global warming—including changes in snow pack and temperature.⁶⁶

In their review article that surveyed 48 predation studies involving mule deer, Forrester and Wittmer (2013) determined that while predation was the “primary proximate cause of mortality for all age classes” of deer, all of the predator removal studies indicate that “predation is compensatory, particularly at high deer densities, and that nutrition and weather shape population dynamics.”⁶⁷ In other words, some deer are “doomed surplus,” who will die no matter what.⁶⁸ If Montana wants to grow its ungulate population, then FWP must foster survival of adult female ungulates to reduce declines; and it must increase nutritional conditions for mule deer as these factors are the most important for mule deer survival.⁶⁹

The scientific literature is clear that large herbivores are limited by their food resources.⁷⁰ Young animals that have access to fewer nutritional reserves are less likely to survive.⁷¹ Mule deer survival is absolutely reliant on their ability to gain access to adequate nutrition – but that nutrition can be hindered by weather, habitat loss, oil and gas development, fire suppression, and other causes. To underscore, the underpinnings of ungulate population density is their access to nutrition, or what biologist call their “nutritional carrying capacity.”⁷²

Moreover, FWP must acknowledge hunting as a major contributor to ungulate mortality. FWP should seriously consider potential reductions in mule deer and elk hunting quotas rather than increasing the trophy hunting of mountain lions and other native carnivores. Addressing unsustainable hunting of ungulates by increasing trophy hunting of mountain lions is not a suitable wildlife management strategy.

¹ R. A. Beausoleil et al., "Research to Regulation: Cougar Social Behavior as a Guide for Management," *Wildlife Society Bulletin* 37, no. 3 (2013).

² E.g., Kristine J. Teichman, Bogdan Cristescu, and Chris T. Darimont, "Hunting as a Management Tool? Cougar-Human Conflict Is Positively Related to Trophy Hunting," *BMC Ecology* 16, no. 1 (2016); Kaylie A. Peebles et al., "Effects of Remedial Sport Hunting on Cougar Complaints and Livestock Depredations," *Plos One* 8, no. 11 (2013); B.T. Maletzke et al., "Effects of Hunting on Cougar Spatial Organization," *Ecology & Evolution* 4, no. 11 (2014).

³ "Linking Resource Selection and Mortality Modeling for Population Estimation of Mountain Lions in Montana," *Ecological Modelling* 312 (2015).

⁴ Beausoleil et al., "Research to Regulation: Cougar Social Behavior as a Guide for Management."; Logan, "Puma Population Responses to Sport Hunting on the Uncompahgre Plateau, Colorado."; Robinson et al., "A Test of the Compensatory Mortality Hypothesis in Mountain Lions: A Management Experiment in West-Central Montana."

⁵ Cynthia Jacobson et al., "A Conservation Institution for the 21st Century: Implications for State Wildlife Agencies," *Journal of Wildlife Management* 74, no. 2 (2010); Michael P. Nelson et al., "An Inadequate Construct? North American Model: What's Missing, What's Needed," *The Wildlife Professional*, no. Summer 2011 (2011).

⁶ See e.g., The Humane Society of the United States, "State of the Mountain Lion: A Call to End Trophy Hunting of America's Lion."; Cougar Management Guidelines, *Cougar Management Guidelines* (Bainbridge Island, WA: WildFutures, 2005).

⁷ Batavia et al. (2018) write: "...nonhuman animals are not only physically, socially, and emotionally disrupted [by trophy hunters], but also debased by the act of trophy hunting. Commoditized, killed, and dismembered, these individuals are relegated to the sphere of mere things when they are turned into souvenirs, oddities, and collectibles. We argue this is morally indefensible. Nonhuman animals are not mere objects but living beings with interests of their own, to whom we owe at least some basic modicum of respect (Regan, 1983). To transform them into trophies of human conquest is a violation of duty and common decency; and to accept, affirm, and even institutionalize trophy hunting, as the international conservation community seems to have done, is to aid and abet an immoral practice." Authors then argue that trophy hunting cannot be "presumed [to be] integral to conservation success."

⁸ A. D. Wallach et al., "What Is an Apex Predator?" *Oikos* 124, no. 11 (2015); R. B. Wielgus et al., "Effects of Male Trophy Hunting on Female Carnivore Population Growth and Persistence," *Biological Conservation* 167 (2013); D. Stoner, M. , M.L. Wolfe, and D. Choate, "Cougar Exploitation Levels in Utah: Implications for Demographic Structure, Population Recovery, and Metapopulation Dynamics," *Journal of Wildlife Management* 70 (2006); S. Creel et al., "Questionable Policy for Large Carnivore Hunting," *Science* 350, no. 6267 (2015); J. L. Weaver, P. C. Paquet, and L. F. Ruggiero, "Resilience and Conservation of Large Carnivores in the Rocky Mountains," *Conservation Biology* 10, no. 4 (1996).

⁹ Stoner, Wolfe, and Choate, "Cougar Exploitation Levels in Utah: Implications for Demographic Structure, Population Recovery, and Metapopulation Dynamics."; Peebles et al., "Effects of Remedial Sport Hunting on Cougar Complaints and Livestock Depredations."; Wallach et al., "What Is an Apex Predator?"; Heather M. Bryan et al., "Heavily Hunted Wolves Have Higher Stress and Reproductive Steroids Than Wolves with Lower Hunting Pressure," *Functional Ecology* (2014); C. T. Darimont et al., "Human Predators Outpace Other Agents of Trait Change in the Wild," *Proceedings of the National Academy of Sciences of the United States of America* 106, no. 3 (2009); Sterling D. Miller et al., "Trends in Intensive Management of Alaska's Grizzly Bears, 1980-2010," *Journal of Wildlife Management* 75, no. 6 (2011).

¹⁰ Chris T. Darimont et al., "The Unique Ecology of Human Predators," *Science* 349, no. 6250 (2015).

¹¹ J. A. Vucetich, D. W. Smith, and D. R. Stahler, "Influence of Harvest, Climate and Wolf Predation on Yellowstone Elk, 1961-2004," *Oikos* 111, no. 2 (2005); G. J. Wright et al., "Selection of Northern Yellowstone Elk by Gray Wolves and Hunters," *Journal of Wildlife Management* 70, no. 4 (2006); L. L. Eberhardt et al., "A Seventy-Year History of Trends in Yellowstone's Northern Elk Herd," *ibid.* 71, no. 2 (2007); Darimont et al., "The Unique Ecology of Human Predators."

¹² Scott Creel and Jay Rotella, "Meta-Analysis of Relationships between Human Offtake, Total Mortality and Population Dynamics of Gray Wolves (*Canis Lupus*)," *PLoS ONE* 5, no. 9 (2010); D. E. Ausband et al., "Recruitment in a Social Carnivore before and after Harvest," *Animal Conservation* 18, no. 5 (2015); Darimont et al., "The Unique Ecology of Human Predators."

¹³ H. S. Robinson and R. Desimone, "The Garnet Range Mountain Lion Study: Characteristics of a Hunted Population in West-Central Montana: Final Report," *Montana Fish, Wildlife & Parks* (2011); H. S. Robinson et al., "A Test of the Compensatory Mortality Hypothesis in Mountain Lions: A Management Experiment in West-Central Montana," *Journal of Wildlife Management* 78, no. 5 (2014); H. S. Cooley et al., "Does Hunting Regulate Cougar Populations? A Test of the Compensatory Mortality Hypothesis," *Ecology* 90, no. 10 (2009); Wielgus et al., "Effects of Male Trophy Hunting on Female Carnivore Population Growth and Persistence."; C. M. S. Lambert et al., "Cougar Population Dynamics and Viability in the Pacific Northwest," *Journal of Wildlife Management* 70 (2006).

¹⁴ Kenneth A. Logan and Linda L. Swearnor, *Desert Puma: Evolutionary Ecology and Conservation of an Enduring Carnivore* (Washington, DC: Island Press, 2001); D. Barnhurst and F. G. Lindzey, "Detecting Female Mountain Lions with Kittens," *Northwest Science* 63, no. 1 (1989); T. Ruth, K. Murphy, and P. Buiotte, "Presence and Movements of Lactating and Maternal Female Cougars: Implications for State Hunting Regulations" (paper presented at the Seventh Mountain Lion

Workshop, Jackson, Wyoming, 2003); T. P. Hemker, F. G. Lindzey, and B. B. Ackerman, "Population Characteristics and Movement Patterns of Cougars in Southern Utah," *Journal of Wildlife Management* 48, no. 4 (1984).

¹⁵ e.g., Robinson et al., "A Test of the Compensatory Mortality Hypothesis in Mountain Lions: A Management Experiment in West-Central Montana."

¹⁶ D. C. Stoner et al., "Dispersal Behaviour of a Polygynous Carnivore: Do Cougars Puma Concolor Follow Source-Sink Predictions?," *Wildlife Biology* 19, no. 3 (2013); Wielgus et al., "Effects of Male Trophy Hunting on Female Carnivore Population Growth and Persistence."; Stoner et al., "Dispersal Behaviour of a Polygynous Carnivore: Do Cougars Puma Concolor Follow Source-Sink Predictions?."

¹⁷ C. R. Anderson and F. G. Lindzey, "Experimental Evaluation of Population Trend and Harvest Composition in a Wyoming Cougar Population," *Wildlife Society Bulletin* 33, no. 1 (2005).

¹⁸ Stoner, Wolfe, and Choate, "Cougar Exploitation Levels in Utah: Implications for Demographic Structure, Population Recovery, and Metapopulation Dynamics."; Logan and Sweanor, *Desert Puma: Evolutionary Ecology and Conservation of an Enduring Carnivore*; Connor O'Malley et al., "Aligning Mountain Lion Hunting Seasons to Mitigate Orphaning Dependent Kittens," *Wildlife Society Bulletin* 0, no. 0 (2018).

¹⁹ L. M. Elbroch and H. Quigley, "Observations of Wild Cougar (Puma Concolor) Kittens with Live Prey: Implications for Learning and Survival," *Canadian Field-Naturalist* 126, no. 4 (2012); L. Mark Elbroch and Howard Quigley, "Age-Specific Foraging Strategies among Pumas, and Its Implications for Aiding Ungulate Populations through Carnivore Control," 1, no. 4 (2019).

²⁰ Lambert et al., "Cougar Population Dynamics and Viability in the Pacific Northwest."; H. S. Cooley et al., "Source Populations in Carnivore Management: Cougar Demography and Emigration in a Lightly Hunted Population," *Animal Conservation* 12, no. 4 (2009); Cooley et al., "Does Hunting Regulate Cougar Populations? A Test of the Compensatory Mortality Hypothesis."; Robinson and Desimone, "The Garnet Range Mountain Lion Study: Characteristics of a Hunted Population in West-Central Montana: Final Report."; Robinson et al., "A Test of the Compensatory Mortality Hypothesis in Mountain Lions: A Management Experiment in West-Central Montana."; H. S. Robinson et al., "Sink Populations in Carnivore Management: Cougar Demography and Immigration in a Hunted Population," *Ecological Applications* 18, no. 4 (2008); Wielgus et al., "Effects of Male Trophy Hunting on Female Carnivore Population Growth and Persistence."; Beausoleil et al., "Research to Regulation: Cougar Social Behavior as a Guide for Management."; Peebles et al., "Effects of Remedial Sport Hunting on Cougar Complaints and Livestock Depredations."

²¹ L. Mark Elbroch et al., "Adaptive Social Strategies in a Solitary Carnivore," *Science Advances* 3, no. 10 (2017).

²² Robinson and Desimone, "The Garnet Range Mountain Lion Study: Characteristics of a Hunted Population in West-Central Montana: Final Report."; Robinson et al., "A Test of the Compensatory Mortality Hypothesis in Mountain Lions: A Management Experiment in West-Central Montana."; Cooley et al., "Does Hunting Regulate Cougar Populations? A Test of the Compensatory Mortality Hypothesis."; Wielgus et al., "Effects of Male Trophy Hunting on Female Carnivore Population Growth and Persistence."; Lambert et al., "Cougar Population Dynamics and Viability in the Pacific Northwest."; Creel et al., "Questionable Policy for Large Carnivore Hunting."; Ausband et al., "Recruitment in a Social Carnivore before and after Harvest."; Darimont et al., "The Unique Ecology of Human Predators."

²³ Peebles et al., "Effects of Remedial Sport Hunting on Cougar Complaints and Livestock Depredations."

²⁴ Stoner, Wolfe, and Choate, "Cougar Exploitation Levels in Utah: Implications for Demographic Structure, Population Recovery, and Metapopulation Dynamics."

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²⁸ K. Hansen, *Cougar: The American Lion* (Flagstaff, AZ: Northland Publishing, 1992); A. Kitchener, *The Natural History of the Wild Cats* (Ithaca, New York: Cornell University Press, 1991).

²⁹ The Humane Society of the United States, "Government Data Confirm That Cougars Have a Negligible Effect on U.S. Cattle & Sheep Industries," (2019).

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³³ Teichman, Cristescu, and Darimont, "Hunting as a Management Tool? Cougar-Human Conflict Is Positively Related to Trophy Hunting."

³⁴ Peebles et al., "Effects of Remedial Sport Hunting on Cougar Complaints and Livestock Depredations."

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³⁷ e.g., Weaver, Paquet, and Ruggiero, "Resilience and Conservation of Large Carnivores in the Rocky Mountains."; W.J. Ripple and R.L. Beschta, "Linking a Cougar Decline, Trophic Cascade, and Catastrophic Regime Shift in Zion National Park," *Biological Conservation* 133 (2006); J. A. Estes et al., "Trophic Downgrading of Planet Earth," *Science* 333, no. 6040 (2011); L. Mark Elbroch and Heiko U. Wittmer, "Table Scraps: Inter-Trophic Food Provisioning by Pumas," *Biology letters* 8, no. 5 (2012); L. Mark Elbroch et al., "Nowhere to Hide: Pumas, Black Bears, and Competition Refuges," *Behavioral Ecology* 26, no. 1 (2015); L. M. Elbroch et al., "Vertebrate Diversity Benefiting from Carrion Provided by Pumas and Other Subordinate Apex Felids," *Biological Conservation* 215 (2017); Christopher J. O'Bryan et al., "The Contribution of Predators and Scavengers to Human Well-Being," *Nature Ecology & Evolution* 2, no. 2 (2018).

³⁸ Sophie L. Gilbert et al., "Socioeconomic Benefits of Large Carnivore Recolonization through Reduced Wildlife-Vehicle Collisions," *Conservation Letters* (2016); O'Bryan et al., "The Contribution of Predators and Scavengers to Human Well-Being."

³⁹ Ripple and Beschta, "Linking a Cougar Decline, Trophic Cascade, and Catastrophic Regime Shift in Zion National Park."; Elbroch and Wittmer, "Table Scraps: Inter-Trophic Food Provisioning by Pumas."

⁴⁰ Elbroch et al., "Vertebrate Diversity Benefiting from Carrion Provided by Pumas and Other Subordinate Apex Felids." Connor O'Malley et al., "Motion-Triggered Video Cameras Reveal Spatial and Temporal Patterns of Red Fox Foraging on Carrion Provided by Mountain Lions," *PeerJ* 6 (2018); Elbroch and Wittmer, "Table Scraps: Inter-Trophic Food Provisioning by Pumas."

⁴¹ M. E. Soule et al., "Ecological Effectiveness: Conservation Goals for Interactive Species," *Conservation Biology* 17, no. 5 (2003).

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⁴³ Logan and Sweanor, *Desert Puma: Evolutionary Ecology and Conservation of an Enduring Carnivore*.

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⁴⁵ Gilbert et al., "Socioeconomic Benefits of Large Carnivore Recolonization through Reduced Wildlife-Vehicle Collisions."

⁴⁶ FWP allows game damage hunts to control ungulate populations in winter while simultaneously allowing trophy hunting of their natural predators, including mountain lions. Auchly, B. (2018). Game Damage Hunters Seeking Game Damage Hunts. Montana FWP. http://fwp.mt.gov/news/newsReleases/talesAndTrails/nr_0083.html.

⁴⁷ While rarely seen in the wild by the general public, wildlife photographers have brought mountain lions closer to us than ever before. Photographers such as Steve Winter (<https://www.stevewinterphoto.com/>) and Tom Mangelsen (<http://mangelsen.com/>) are helping people understand just how magnificent these iconic wild cats truly are.

⁴⁸ M. L. Elbroch et al., "Contrasting Bobcat Values," *Biodiversity and Conservation* (2017); U.S. Fish and Wildlife Service, "2016 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation: National Overview," ed. U.S. Fish and Wildlife Service (2017).

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⁵⁵ K.A. Logan, "Puma Population Responses to Sport Hunting on the Uncompahgre Plateau, Colorado," ed. Mammals Research (Colorado Parks and Wildlife2014); Robinson et al., "A Test of the Compensatory Mortality Hypothesis in Mountain Lions: A Management Experiment in West-Central Montana."

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- ⁵⁶ "Linking Resource Selection and Mortality Modeling for Population Estimation of Mountain Lions in Montana," *Ecological Modelling* 312 (2015).
- ⁵⁷ Beausoleil et al., "Research to Regulation: Cougar Social Behavior as a Guide for Management."; Logan, "Puma Population Responses to Sport Hunting on the Uncompahgre Plateau, Colorado."; Robinson et al., "A Test of the Compensatory Mortality Hypothesis in Mountain Lions: A Management Experiment in West-Central Montana."
- ⁵⁸ T. D. Forrester and H. U. Wittmer, "A Review of the Population Dynamics of Mule Deer and Black-Tailed Deer *Odocoileus Hemionus* in North America," *Mammal Review* 43, no. 4 (2013), p. 300, p. 300
- ⁵⁹ Ibid., p. 300, p. 300
- ⁶⁰ "Demographic Response of Mule Deer to Experimental Reduction of Coyotes and Mountain Lions in Southeastern Idaho," *Wildlife Monographs*, no. 178 (2011).
- ⁶¹ "Effect of Enhanced Nutrition on Mule Deer Population Rate of Change," ibid., no. 172 (2009).
- ⁶² Ibid.
- ⁶³ "Habitat Management Influences Overwinter Survival of Mule Deer Fawns in Colorado," *Journal of Wildlife Management* 78, no. 3 (2014).
- ⁶⁴ Barbara L. Peckarsky et al., "Revisiting the Classics: Considering Nonconsumptive Effects in Textbook Examples of Predator-Prey Reactions," *Ecological Society of America* 89, no. 9 (2008).
- ⁶⁵ Hatton et al., "The Predator-Prey Power Law: Biomass Scaling across Terrestrial and Aquatic Biomes."
- ⁶⁶ K. L. Monteith et al., "Life-History Characteristics of Mule Deer: Effects of Nutrition in a Variable Environment," *Wildlife Monographs* 186, no. 1 (2014); Forrester and Wittmer, "A Review of the Population Dynamics of Mule Deer and Black-Tailed Deer *Odocoileus Hemionus* in North America."
- ⁶⁷ "A Review of the Population Dynamics of Mule Deer and Black-Tailed Deer *Odocoileus Hemionus* in North America." p. 292
- ⁶⁸ Monteith et al., "Life-History Characteristics of Mule Deer: Effects of Nutrition in a Variable Environment."
- ⁶⁹ Ibid.; Forrester and Wittmer, "A Review of the Population Dynamics of Mule Deer and Black-Tailed Deer *Odocoileus Hemionus* in North America."; K. F. Robinson et al., "Can Managers Compensate for Coyote Predation of White-Tailed Deer?," *Journal of Wildlife Management* 78, no. 4 (2014).
- ⁷⁰ Monteith et al., "Life-History Characteristics of Mule Deer: Effects of Nutrition in a Variable Environment."
- ⁷¹ Ibid.; T. M. Pojar and D. C. Bowden, "Neonatal Mule Deer Fawn Survival in West-Central Colorado," *Journal of Wildlife Management* 68, no. 3 (2004); Bruce Watkins, James Olterman, and Thomas Pojar, "Mule Deer Survival Studies on the Uncompahgre Plateau, Colorado 1997-2001," *Colorado Division of Wildlife* (2002); Bishop et al., "Effect of Enhanced Nutrition on Mule Deer Population Rate of Change."
- ⁷² Monteith et al., "Life-History Characteristics of Mule Deer: Effects of Nutrition in a Variable Environment."

From: tthier@interbel.net
To: [FWP Wildlife](#)
Subject: [EXTERNAL] Comments on Proposed Lion Season.
Date: Sunday, March 13, 2022 9:51:30 PM
Attachments: [Comments 2022 Lion Season.docx](#)

Please forward the attached letter to each of the Commissioners. Thank you.

March 13, 2022

Montana Fish & Wildlife Commission
MT FWP
PO Box 200701
Helena, MT 59620

Dear Commissioners,

I would like to take a moment to comment on the proposed 2022 Mountain Lion Hunting Regulations. It is my extreme hope and desire that each of you will take a moment to actually read and consider what I have to say.

Montana Fish, Wildlife and Parks has spent decades working with the citizens of this state in formulating current season structures for all wildlife. Mountain lions are certainly no exception. In fact, any proposed changes to the lion season structure in R-1 was a guarantee for a full house at our bi-annual meetings. Over the years, various options for lion hunting were implemented and then adjusted, including a quota system that didn't work. For sound biological and ethical reasons, a consensus was finally reached that the current permit-based system with a male subquota made the most sense. I am not aware of anyone that thinks a change is necessary or that there is a problem that needs to be fixed.

It is somewhat of a mystery as to the origin of the current proposal. Can someone please explain exactly what problem it is the Commission is trying to fix? Or is it simply another proposal by Commissioner Taber to cater to outfitters (like himself) and nonresident hunters at the expense of Montana's hunting public and wildlife resources?

I ask that each of you to please be honest with yourselves in answering the above questions and to do the right thing. The public's faith in the Commission has taken a serious turn for the worse and it is time for you to change that.

Sincerely,

Tim Thier
Trego, MT

From: [royaltine](#)
To: [FWP Wildlife](#)
Subject: [EXTERNAL] Question
Date: Monday, March 14, 2022 7:10:13 PM

Seems to me you have to limit non resident licenses or an area could close just with outfitted non resident hunters and the locals aren't going to be ok with that. That's how the whole permit deal came about in the first place.

Cody

From: [Deb Solum](#)
To: [FWP Wildlife](#)
Subject: [EXTERNAL] proposed lion hunting changes
Date: Wednesday, February 9, 2022 4:59:25 PM

I read through all the information and there is a mistake in the unlimited license info. If you can't even get the new info correct, how do you expect comments to be positive? I think this is a really unreasonable proposal. What is wrong with what we have now? I thought the Dept. was trying to simplify regulations and licensing. Now all lion licenses will be limited on where we can hunt either archery/fall no dogs or winter? I don't know why you want to come up with that. I respectfully "vote" against this proposed change.

Deb Solum
Rudyard, MT

From: Scott Belz
To: FWP Wildlife
Subject: [EXTERNAL] New Lion Season Question
Date: Monday, March 14, 2022 6:38:31 PM

Hello,

Can you have a training license and a tag both? Many of us do not necessarily want to fill a tag but we like to chase in a number of different districts and have a tag available for at least some districts.

Over shooting a quota that is supposedly in place based upon science is a complete oxymoron which is exactly what this will do.

The commission and the director were wanting to "simplify" the deer/elk, etc. regs. This is completely counter to that supposed goal.

In the public comment area... we are forced to choose a percentage in order to submit a comment. It seems like this will be used against us as for example, I am against this whole thing entirely but had to pick a percentage to submit my comment. We should be able to clearly state we are opposed to this.

Scott Belz, resident of Region 2



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[\[avast.com\]](http://avast.com)

From: [Dustin Horswill](#)
To: [FWP Wildlife](#)
Subject: [EXTERNAL] Mountain Lion Season Structure Proposal Public Comment
Date: Saturday, March 19, 2022 10:33:11 AM

Good morning,

I realize that this morning is 19 MAR and public comment is due by 18 MAR. Today is the first Saturday after the public comment Zoom meetings. I wanted to make sure that I took the proper time to address the meeting and proposal with clear, concise thoughts and arguments.

Please include my comments into consideration.

During the zoom meetings on 14 and 15 MAR, I listened to FWP Game Management Bureau Chief Mr. Brian Wakeling answer questions from the public. He was professional and did a good job explaining the proposal and how it would work. However, there were questions that he was unable to answer and he stated that those would need to be answered by the commission themselves. For me, these are the questions that were the most important when considering this proposal.

1. What is the intent of this proposal? From a game management prospective, how does this proposal benefit Montana hunters? Mr. Wakeling stated that the intent of the proposal would need to be answered by the commission. This should be standard practice when considering proposals. It is important to talk about how the proposal would work, who would be affected by it, explain the rules, etc. But there should be transparency as to why we are changing the current structure. And who would benefit from the changes. I will expand upon this more later. As for the game management portion of the question, Mr. Wakeling stated that there is no additional benefit for game management with the new proposal. He stated that the current quota system works in order to meet management objectives for mountain lions within the state of Montana. With that analysis, we can therefore assume that the changes the proposal is making is not a science based need, that there are other driving factors behind it. The second part of this question still needs to be answered. If it is not a science based need for better management, how does this proposal benefit **Montana** hunters?

Looking at how the proposal will be implemented and the cause and effect it will have on **Montana** hunters, I do not see the added value that it would bring over the current system in place. Mr. Wakeling did a great job of answering questions, but he did not present any information that would contradict this statement. Currently, if hunters want to pursue mountain lions in an exclusive area and be ultra selective, they can apply for Region 1. If they want first chance at an area, they can apply for Region 2. If they want to hunt multiple areas, help out land owners with predator management in multiple locations or see and run different lion country (the rolling timbered ridges and mountains of Region 3 differ greatly from the steep cliff canyons on the eastern front in Region 4, offering unique challenges for the hunter and hounds in each), they can buy over the counter and hunt anywhere in Regions 3-7, with the ability to fill a tag in any open quota LMU. This system meets the management goals set by FWP for the state and benefits all **Montana** hunters.

The proposal limits **Montana** hunters. It confines hunters to specific LMU's. How that confinement is going to be implemented is yet to be determined. Mr. Wakeling stated that it will more than likely not be by region. And that at first, it will be very conservative to see the effects of this new system, it will be by LMU or a small number of LMU's grouped together.

How do these restrictions benefit **Montana** hunters? There is already an opportunity to apply for limited entry draw tags in Regions 1 and 2. The opportunity is still available to harvest trophy class cats in the other regions as well, if that is the basis. So who stands to benefit from limiting the **Montana** hunter from opportunities to harvest a mountain lion in multiple LMU's, as long as the quota is open?

If the proposal is not science based to improve management and it does not benefit **Montana** hunters, then what is the intent? Looking at the proposal as written, there is one group that stands to benefit the most, with another benefiting greatly. Those groups are outfitters and out of state hunters.

Outfitters are given a certain area or region in which they can conduct business on public ground. They have to apply for a permit or special use license by the governing agency. This makes a lot of sense so you do not have too many outfitters competing for the same resources (game). Outfitters however are still competing with **Montana** hunters for these same areas because they are public ground, open to any **Montana** hunter with the proper licenses. If the normal **Montana** hunter harvests a lion in a LMU that the outfitter has a permit to hunt in, it takes away an opportunity for the outfitter to fill a clients tag. If the quota for the LMU's the outfitter has a permit to hunt in fills, the outfitter can no longer guide clients for mountain lions that year on the public ground that they have a permit for. They can still guide on private ground in any open LMU.

By limiting **Montana** hunters to specific LMU's, the proposal reduces the outfitters' competition to filling the quota. Less **Montana** hunters will be hunting in their areas because they do not have the opportunity to harvest in the LMU, unless they buy that LMU specifically. And if they do hunt the LMU with a hound training license, they are not allowed to harvest there. Outfitters will now be able to sell more hunts because the quota will be open longer. The proposal takes away opportunity from **Montana** hunters and gives it to outfitter clients.

The proposal also does not limit out of state hunters. I think that this is intentional because of the above reason the proposal benefits outfitters. Out of state hunters are limited to 40 hound training licenses. One of these licenses is required, with a valid mountain lion license, to hunt in Montana with your own hounds. Mr. Wakeling stated that only 20 or so of these licenses were given last year. The rest of the out of state hunters must go with a licensed outfitter. And the current proposal has unlimited out of state licenses available to be purchased over the counter. By limiting the opportunity for **Montana** hunters, outfitters will be able to book more out of state hunters.

Game management is not a zero sum game, that is obvious. The limiting resource is going to be the mountain lion. With that in mind, you cannot keep the status quo of the current system and add additional opportunities to outfitters and out of state hunters. You must take from one to give to another, something will need to give, and with this proposal, it is the **Montana** hunter that suffers.

My hope is that the **Montana** FWP Commission takes these comments into consideration and that the proposal is not already a decided course of action. The Commision has a huge responsibility, and I understand it is not an easy job. Decisions made should be at the benefit of all **Montana** hunters and not benefit a certain demographic or select few.

Respectfully,

Dustin Horswill

From: [Clint Nagel](#)
To: [FWP Wildlife](#)
Subject: [EXTERNAL] GWA comments on Proposed Change to Mountain Lion Hunting and Peregrine Falcon Take
Date: Wednesday, March 16, 2022 4:20:44 PM
Attachments: [20220315.GWA comments on mountain lion hunting regs.docx](#)

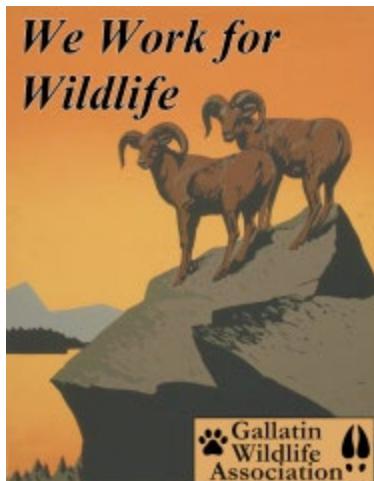
Dear Fish and Wildlife Commissioners and Director of Fish, Wildlife and Parks:

Below in the attached are comments from our organization representing our membership. Please accept them as part of the official record.

Thank you,

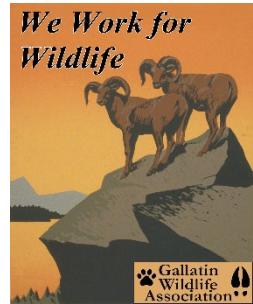
Sincerely,

Clinton Nagel, President
Gallatin Wildlife Association



**GALLATIN WILDLIFE
ASSOCIATION**

P. O. Box 5317
Bozeman, MT 59717
(406) 586-1729
www.gallatinwildlife.org



March 15, 2022

Montana Fish and Wildlife Commission
1420 East Sixth Avenue
P.O. Box 200701
Helena, MT 59620-0701

Dear Fish and Wildlife Commissioners:

The Gallatin Wildlife Association received a letter dated February 8, 2022 from Montana Fish, Wildlife and Parks (MFWP) soliciting comments on two proposed changes to hunting regulations. These changes to current regulations pertain to the harvesting of mountain lions and peregrine falcon. It is based upon that solicitation, that our organization wishes to respond. We would like to briefly state, a few words about our organization.

Gallatin Wildlife Association (GWA) is a local, all volunteer wildlife conservation organization dedicated to the preservation and restoration of wildlife, fisheries, habitat and migration corridors in southwest Montana and the Greater Yellowstone Ecosystem, using science-based decision making. We are a nonprofit 501 (c) (3) organization founded in 1976. GWA recognizes the intense pressures on our wildlife from habitat loss and climate change, and we advocate for science-based management of public lands for diverse public values, including but not limited to hunting and angling.

Our organization must say at the outset, that we don't know what precipitated this initiative to increase the take of mountain lions. An article in the Helena Independent Record by Tom Kuglin states this.

"The new proposal comes from Commissioner Pat Tabor of Whitefish, who works as an outfitter and said the commission has an obligation to provide opportunity for all."

"There can't be just one set of winners and a whole set of losers," he said.

"Under permit-only in Region 1, not all lions available to hunters with permits are killed, he noted as an chance to allow more general license opportunity."

The first thing that comes to mind is the fact that there is a Fish and Wildlife Commissioner sitting on the state-wide commission who has a business as an outfitter. Mr. Tabor is the founder and owner of Swan Mountain Outfitters of northwest Montana. We wonder how is this not considered a "conflict of interest"? We have an outfitter who

sits on the statewide commission making decisions in favor of outfitters. Under what system is this considered transparent and just? Mr. Tabor not only voted on this resolution, but it was his idea if all news accounts are accurate. If this is not true, then the public has a right to know the rationale behind the change.

Our second concern is the lack of scientific reasoning behind this change? What is the justification? According to the news article and others like it, the rationale is to make sure that everyone comes away as a winner. So, the rationale is: we need to make all hunters happy no matter if it is harmful to the overall population of a certain species. Or perhaps in this case, that argument is stronger to make because we are discussing the harvesting of predators. Is this the argument?

GWA is not anti-hunting, but want all applicable state, federal, and tribal agencies to follow and enforce the North American Model of Wildlife Conservation as part of an overall scientific-based management tool. We definitely don't see that here. According to the letter we received, this proposal allows the special limited licensee to hunt throughout the season without limits to quota or harvest at the same time as an unlimited licensees can hunt until a quota is reached. In addition, the special limited hunter can take up to 30% of the harvest. GWA can't help but reach a conclusion that this places an undue amount of pressure on the population. There definitely seems to be a contrary and vindictive sentiment toward predators in this state and this action is just another example of it.

That brings us up to the question, how many mountain lions are prevalent in the state? The answer is: GWA does not believe the state really knows. MFWP estimate the number to be near or perhaps slightly over 5,000. Yet others, including the Mountain Lion Foundation, claim the number to be between 2,100 and 3,258 according to their web page. This sounds all too familiar. Whether it be State House and Senate members or the Fish and Wildlife Commission, there seems to be a rush to change regulations mid-stream before the science and the reality on the ground is truly known.

Before we leave the subject of mountain lions, GWA would like to state for your consideration, the totality of months whereby the mountain lion is under pressure from hunting is eight (8) months. It has been said that this long hunting season places mother lions at risk of being killed themselves with their cubs being orphaned, leaving them to die from either natural or unnatural causes as a result. There just doesn't seem to be a harvesting program that is designed around the biological or ecological rationale. All regulations seem to be directed at making the harvesting of wildlife easier, more efficient, and in today's changes, more financially advantageous.

Concerning the peregrine falcon, GWA will leave our comment resting on a statement in the letter we received. It states the following:

FWP has been urged by the USFWS not to alter the current quota system until USFWS completes an EA that will allow for a decision on normalization or opening of take across the falcon's range. The analysis has been delayed but will hopefully occur during the 2022-23 biennium.

According to the letter, the amount of take of peregrine falcon has been relatively low. We have no reasons to doubt the veracity of that fact. We concur that the MFWP should wait till more information from USFWS is available before regulations are changed.

Conclusion:

GWA doesn't think there is a justification to alter hunting regulations for either species, mountain lions or peregrine falcon at this time. The indication to do so is not based upon scientific reasoning, if it is, it is not presented before the public. But the desire to change hunting regulations seems to be based upon an individual choice of one commissioner. It is time to fulfill these positions with personnel who don't have a financial incentive for the decisions they make. It is time to fulfill these positions with people who take the positions seriously and act accordingly to fulfill the mission of the agency and preserve the trust for all Montanans.

We urge the Montana Fish and Wildlife Commission to use a greater sense of reflection, study and thought to these proposals. We urge you to listen to the biologists, the scientists and other wildlife managers. We believe there is too much personal desire, politics, and outside influence into these proposals. We need to return science back into the equation.

Sincerely,



Clinton Nagel, President
Gallatin Wildlife Association

From: [Steve Platt](#)
To: [FWP Wildlife](#)
Cc: [CommissionerRegion1@mtfwp.org](#); [CommissionerRegion2@mtfwp.org](#); [CommissionerRegion3@mtfwp.org](#); [KC Walsh](#); [CommissionerRegion5@mtfwp.org](#); [CommissionerRegion6@mtfwp.org](#); [CommissionerRegion7@mtfwp.org](#)
Subject: [EXTERNAL] 2022-2023 Mountain Lion Hunting Regulations, Season Structures and Boundaries- Proposed
Date: Wednesday, March 16, 2022 11:15:03 AM
Attachments: [HAAlionregs.docx](#)



2763 Grizzly Gulch Helena, MT 59601

March 16, 2022

RE: 2022-2023 Mountain Lion Hunting Regulations, Season Structures and Boundaries- Proposed

Dear Montana Fish, Wildlife & Parks Commissioners,

Helena Hunters and Anglers (HHAA) is an all-volunteer group dedicated to protecting and restoring fish and wildlife to all suitable habitats, and to conserving all natural resources as a public trust, vital to our general welfare. HHAA promotes the highest standards of ethical conduct and sportsmanship, and promotes outdoor recreation opportunity for all citizens to share equally.

HHAA has two Board members, Doug Powell, and Rod Bullis, with significant experience with Montana mountain lion management and hunting. Doug was the capture team leader for the CMR Mountain Lion Breaks Project (2011-2016) and the wildlife pilot for the Garnet Range Mountain Lion Study (1998-2006). Rod Bullis was actively involved in the Garnet Range Lion Study during the same time period and an avid supporter of mountain lion management and hunting.

We view this proposal as a solution looking for a non-existent problem. Across the state non-commercial Montana houndsmen are generally happy with what they've got in their own regions. For at least 20 years houndsmen from each of

Montana's seven regions have respected the season structure in each other's region; i.e. Region 3 hunters didn't tell Region 2 hunters what to do. Also, each Region has its own unique landscape, prey base, and lion habitat.

There have been three statewide "Options" put forward by the Commission; Options 1 and 2 were presented at the December 14th Commission Meeting. A third Option was introduced at the February 4th Commission meeting.

Mountain Lion season structure has been the topic of great debate in Montana. The current regulations and season structure were implemented based on both biology and hunter input. Before the current season structure was enacted, there were often races to fill tags before lion management units closed, with hunter competition leading to general hunter dissatisfaction. The current season structure addressed these problems and has worked well for the last 20 years. HHAA is adamantly opposed to Option 3.

Limited Special Licenses

It is our understanding that the Commission wants specific comments on the February 4th lion season "motion" (Option 3). We recommend the Commission set aside no more than 10% of the quota of any region or cluster of district Limited Special Licenses, for the purpose of providing a limited quality hunting opportunity not subject to the quota.

Both the Limited Special License and the Unlimited Special License eliminate the opportunity to go to different parts of the state to harvest a lion thus reduces, restricts and constrains opportunity for resident hunters.

Unlimited Special Licenses

Under this proposal there is no limit on non-resident lion hunters. History shows that this type of season produced the past horrible race-to-kill lion situation that our current season structure has largely fixed.

It is HHAA's opinion that there is incredible confusion and frustration about Option 3 among resident houndsmen. Why has this option been proposed and who will it benefit from it? We believe that it opens the door for unlimited non-resident, outfitted lion hunters. It appears that the Commission's focus on Option 3 will mostly benefit the outfitting industry while putting resident lion hunters

back to the long ago days of the race-to-fill lion quotas. Option 3 is likely to lead to unpredictable lion harvest, whereas our current regulations produce predictable lion harvest. We support Montana FWP counting all trapping/snaring lion kills, illegal and overrun mortality in the lion management unit quotas.

We don't know what FWP's lion quotas or permit numbers are going to be at this time but we see no reason to increase either lion quotas or permit numbers above those of the 2021 season. Option 3 is purely social, without the biological justification that has gone into the existing regulations.

In closing HHAA is deeply opposed to Option 3 and its "allocation of harvest between Unlimited Special Licenses that will end when a quota is reached and a Special Limited License that would allow hunts during the same period." As already mentioned we support keeping the existing 2021 Mountain Lion Regulations for the 2022-2023 season. This will preserve existing lion hunting traditions and honor the unique hunting culture of each region.

Thank you for the opportunity to comment.

Sincerely,

Helena Hunters and Anglers:

Rod Bullis
Steve Platt

Cc: FWP Commissioners, FWP Director, FWP Regional Supervisors

From: [Dean Blomquist](#)
To: [FWP Wildlife](#)
Subject: [EXTERNAL] Mountain Lion Regulations
Date: Sunday, March 13, 2022 11:33:15 AM

It appears the new proposals for hunting lions is only focused on and geared toward outfitters. If something smells unhealthy it usually is.

Dean Blomquist

Sent from [Mail \[go.microsoft.com\]](#) for Windows

From: [Scott Belz](#)
To: [FWP Wildlife](#)
Subject: [EXTERNAL] Mountain Lion Proposal
Date: Thursday, March 17, 2022 8:37:34 PM
Attachments: [Dear Commissioners.pdf](#)

Dear Commissioners,

I am a 20+ year resident of the great state of Montana, over half my life. The vastness and endless recreation opportunities were what drew me here and continue to be what keeps me here. Hiking, hunting, fishing, and exploring the backcountry and wildernesses on horseback are what my family and life have been set up around. I distinctly remember when the ALS system came out. My buddy and I were worried we would forget our number that corresponds with our date of birth, so we went to the Region 2 office on Spurgin Rd. before it opened to be sure to get ALS #1. Instead of being an annual or occasional visitor, I am engaged and immersed in the land and community daily. It has been unnerving to experience the rapid changes taking place here recently. FWP once managed the wildlife for opportunity for the residents here, allocating some special areas for trophy opportunity and enabling the ability for outfitters and guides to make a living. This worked out great as I was a guide for 11 years and still have a soft spot for those in the industry.

As with any facet of life the only constant is change. Less game on public land, more on private land. What used to be “just close the gate behind you” is now leased to the highest bidder, resident or nonresident. I can certainly appreciate capitalism and the value of the dollar. Nonresident tags capped at approximately 17,000 to over 50,000 for 2021. Again, the value of the dollar comes into play. Slowly, hunting has been heading down the path of becoming the “sport of kings” and something the average Jane or Joe cannot afford to participate in.

Now the easiest predator to manage is up for bid. The new mountain lion proposal will allow nonresidents to purchase an over-the-counter lion tag and go hunt with an outfitter. Under this proposal outfitters and guides could have the opportunity to race out and close lion quotas at an alarming rate. Who cares about the residents who feed, train, and love their four-legged family members all year, year after year? The residents who’s calendar year begins on Dec.1 and ends on April 14. The residents which are by far the majority of houndsmen and houndswomen compared to the number of outfitters dedicated to the way of life. Taking away the legitimate opportunity of a Montana resident houndsman/houndswoman to fill their tag with their own dogs under a fair quota system is absolutely appalling. This proposal is completely one-sided and self-serving to Pat Tabor and a few outfitters, that is all, and the rest of us are left high and dry. Not to mention the ethical concerns this clearly points to of Pat Tabor using his public service position to advance his personal agenda. Another result of this would be illegal outfitting as nonresidents can purchase an OTC tag and have a resident hound handler take them hunting.

Please take the time to fully analyze this proposal for what it is and do the right thing for the majority of us houndspeople here in Montana. Do the outfitters deserve a piece? Absolutely! But not the whole pie! It is my sincere hope that you as commissioners representing the public interest here in Montana can stop this since it is apparent the Director of FWP and our Governor are not acting on our behalf.

Thank you for your time,

Scott Belz

406-544-5613

scottmbelz@gmail.com



Virus-free. www.avast.com [avast.com]
[avast.com]

From: [Jim Vashro](#)
To: [FWP Wildlife](#)
Subject: [EXTERNAL] Region 1 Mountain Lion Season Proposal
Date: Friday, March 11, 2022 12:43:31 PM
Attachments: [Mountain Lion Season Comments.docx](#)

Please accept the attached comments from Flathead Wildlife, Inc. on the proposed 2022-23 Mountain Lion seasons. Thank you.

Jim Vashro, Flathead Wildlife President
(406) 270-9914 jsjvash@montanasky.us



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avast.com



Flathead Wildlife, Inc. Comments on Proposed FWP Region 1 Mountain Lion Seasons

Flathead Wildlife, Inc. (FWI) has been in existence for more than 65 years with the goals of protecting and enhancing our hunting and fishing heritage and protecting wildlife and wildlife habitat. FWI objects to the proposed 2022-23 Mountain Lion Seasons adopted by the FW Commission which would allow only a “hybrid” permit/quota season or quota only mountain lion season in Region 1.

Twenty years ago Region 1 lion hunting was managed on a quota system. There was extreme interest by hunters and in years when conditions were right, such as fresh snow and good access, the season could close within 24 hours. Even with an emergency closure, harvest could exceed the quota by as much as 200 percent. With the mad scramble hunters, and particularly guided hunters, knew if they passed on a lion they might not get another chance. So many of the lions killed were young and/or females. The system didn’t work for hunters or lions.

Therefore, Region 1 went to a limited entry permit system. Permits did cut opportunity although hunters without permits could still chase lions. But hunters with permits could now have more quality hunting time and be more selective in their harvest. Working folks could time hunts to fit their schedules.

Returning to a quota system is totally unfair to hunters and lions. Mad scrambles would return, too many lions would be harvested. The only ones who would benefit would be nonresidents and guides who could now book in a hunt for the mad scramble. Almost all of our limited harvest hunts for trophy bucks or bulls, moose, sheep, goat, etc. are managed through limited entry permits instead of quotas because quotas create intense competition between hunters, often result in overharvest and decrease the quality of harvested animals.

Likewise, FWI does not see any benefit to the hybrid system. That would also create a mad scramble for that portion of the harvest on a quota. Excess harvest would have to be compensated with reduced quotas and limited permits in future years. Again, the primary benefit seems to be more opportunity for nonresidents and guides.

Flathead Wildlife objects that the existing limited entry lion permits that have worked so well for 20 years were not even included as an option. We urge the FW Commission to stay with the existing mountain lion limited entry permit system for Region 1.

The Board of Flathead Wildlife, Inc.

Jim Vashro, President

From: [Marcus Strange](#)
To: [FWP Wildlife](#)
Subject: [EXTERNAL] MWF Comments - 2022 and 2023 Mountain Lion Regulations
Date: Thursday, March 17, 2022 11:49:52 AM
Attachments: [Comments - PROPOSED 2022-2023 MOUNTAIN LION REGULATIONS.pdf](#)

To whom it may concern,

Please find the attached comment letter from the Montana Wildlife Federation regarding **2022-2023 MOUNTAIN LION HUNTING REGULATIONS, SEASON STRUCTURES AND BOUNDARIES**. Please confirm receipt of this email and thank you for the opportunity to comment.

Best regards,



Marcus Strange (He/Him)
Director of State Policy and Government Relations
Montana Wildlife Federation

-
- (406) 916-2585
 - mstrange@mtwf.org
 - www.montanawildlife.org
[montanawildlife.org]
 - PO Box 1175, Helena, MT, 59624

[Become a Wildlife Advocate](#)

[\[montanawildlife.org\]](http://montanawildlife.org)

I gratefully acknowledge I live, work, hunt, fish, and grow in the homeland of the Niitsípiis-stahkoii and Salish Kootenai. Visit <https://native-land.ca/> to learn more about the Indigenous land where you live.



Protecting Montana's wildlife, land, waters, and hunting & fishing heritage for future generations.

18 March 2022

Wildlife Division
Montana Fish, Wildlife & Parks
PO Box 200701
Helena, MT 59620

RE: MWF Proposed 2022-2023 Mountain Lion Regulations Comments

To whom it may concern,

The Montana Wildlife Federation (MWF) is the state's largest hunter advocacy organization consisting of thousands of Montanans who value sound wildlife management and our storied hunting and outdoor legacy. Together with our 18 affiliate clubs, we ensure that conservation dollars are efficiently spent on only wildlife conservation-related activities, promote sound biology in managing our state's wildlife, and safeguard our hunting heritage.

The hunting of mountain lions is not only one of our most important management tools, but is also a cherished aspect of our hunting heritage as Montanans. In this context, we express our gratitude to the Department of Fish, Wildlife, and Parks (FWP or Department) and the FWP Commission for the opportunity to comment on the proposed changes to the 2022-2023 mountain lion hunting regulations.

While not expressly given as an alternative, MWF strongly recommends that the unlisted alternative of "no change" be adopted by FWP based on the following justifications:

- 1. There is no biological need to make these changes.** As a state, Montana is already getting the harvest of mountain lions we need for biological diversity and sustainability. Nothing in this proposal from the commission addresses a biological need for these changes. We respectfully request that, at a minimum, the Department provide data to support making these changes.
- 2. There is no sociological need to make these changes.** Hunters and houndsmen have spoken out repeatedly against these changes. The vast majority of Montanans oppose these changes for various reasons, not the least of which is the unnecessary complexity this new system would create. Our current system, which functions effectively, was developed over decades of collaboration and scientific study. If the Department sincerely

wishes to simplify hunting regulations, this is one area where what they have brought forward will do the opposite of the desired outcome.

3. **Montana has already tried quota-style hunts in the past**, and there have been poor results both in terms of management results and quality of hunter experience. In some areas, the harvest was at 200% of the quota within 24 hours, with nonresident harvest accounting for well over the traditional 10% cap intended to prioritize the resident, do it yourself Montana hunters. As stated in our state's constitution, Montana's wildlife should be primarily managed for the benefit of her citizens, and experience has shown that quota-style hunts primarily benefit nonresidents and have an adverse effect on management objectives.
4. **This proposal was pushed by a tiny minority and was not asked for by the public.** Local stakeholders have spoken up early and often during this process and expressed united and overwhelming opposition to this proposal. The only individuals who would benefit are outfitters and their clients and a small number of nonresident hunters, at the expense of the Montana hunter.

In closing, MWF strongly recommends FWP adopt the unlisted alternation of "no change" until such time as there is a biological need to reenvision our mountain lion management strategy, combined with robust support from Montana's hunter conservationists.

Sincerely,



Marcus Strange
Montana Wildlife Federation
Director of State Policy and Government Relations

From: [FWP General](#)
To: [FWP Wildlife](#)
Subject: FW: [EXTERNAL] Limited Special Lion License comment
Date: Wednesday, March 9, 2022 12:02:50 PM

From: Darwin Reynolds <rnldz@itstriangle.com>
Sent: Wednesday, March 9, 2022 10:22 AM
To: FWP General <fwpgen@mt.gov>
Subject: [EXTERNAL] Limited Special Lion License comment

Please forward to the appropriate comments office or individual, thank you

This comment is in regards to the "proposed" Limited Special Lion License: that would allow lions to be taken in addition after the quota is reached in an area.

Your comment section associated with this proposal only allows one to pick which options that are listed, ie 10, 20, or 30 percent allocation of tags and which combination of units. It does not have a section for pro or con answers. This sounds like the decision is already made???

My comment is this: This Limited Special Lion License: proposal is nothing more than catering to the outfitter/guide industry that seems to be the main focus of recent FWP decisions. I am a rancher in the Snowy Mtns. with a fair population of lions. However, I for one don't care if you kill them all but am getting tired of special regulations that benefit the **paid hunting industry**. If you have a **quota** for an area, would that not be supported by sound game management analysis. Why deviate from that management goal?

There should **not** be any "Limited Special Lion License:" implemented.

Darwin Reynolds 406-899-8293

3 Smokes Ranch

2258 east dry creek road

Buffalo, Mt 59418

From: [Andrea Zaccardi](#)
To: [FWP Wildlife](#)
Subject: [EXTERNAL] CBD Comments re Mountain Lion Season Setting
Date: Wednesday, March 16, 2022 12:25:52 PM
Attachments: [CBD Comment Opposing Special Licenses wo Quota \(March 2022\).pdf](#)

Please see attached the Center for Biological Diversity's comments regarding Montana's season setting proposals for mountain lions.

Thank you,
Andrea Zaccardi

Andrea Zaccardi
Carnivore Conservation Legal Director
Center for Biological Diversity
P.O. Box 469
Victor, ID 83455
(303) 854-7748



March 16, 2022

Montana Fish, Wildlife & Parks
Wildlife Division
1420 East Sixth Avenue
P.O. Box 200701
Helena, MT 59620-0701
Tel: (406) 444-2612
Email: fwpwld@mt.gov

Re: Mountain Lion Hunting Season Structure Proposal

To Montana Fish and Wildlife Commission,

On behalf of the Center for Biological Diversity (“Center”), I submit the following comments opposing the current proposal to allow special limited licenses that would allow the hunter to hunt throughout the season without limitation by quota. The Center is a non-profit conservation organization dedicated to the protection of native species and their habitats through science, policy and environmental law. The Center has more than 1.7 million members and supporters dedicated to the protection and restoration of various species and the wild places they inhabit, including more than 5,700 members and supporters in Montana. The Center has worked for many years to protect exploited wildlife including top predators such as mountain lions. As a general matter the Center does not support the trophy hunting of mountain lions but offers the following comments in recognition that Montana still permits mountain lion hunting.

For several years Montana has been in the process of developing a new mountain lion management plan. This process is ongoing and not yet complete. Nevertheless, without the guidance of a current management plan, the Commission is now considering a proposal that would allow special limited licenses allowing hunters to kill mountain lions throughout the season without any quota limitation. The Commission is considering whether the allocation to special license hunters should range anywhere from 10-30%, and whether the licenses should be valid for an entire region or only for a subset of Lion Management Units.

There are several issues with this proposed approach.

First, it is difficult to comprehend the purpose of setting regional hunting district quotas if 10-30% of hunting licenses are not restricted to those quotas. This could lead to large numbers of mountain lions being taken from one or two hunting districts, causing location-specific declines or even localized eradication of the species. This would not only have negative impacts to the

local ecosystem but also would make it significantly more difficult for hunters in the years following to successfully hunt a mountain lion.

Second, currently different hunting districts have different hunting seasons, with some hunting units closing before others. It is unclear under the new proposal whether those hunting seasons would change, which would be even more complicated if special licenses are not limited to a specified hunting district.

Third, most hunting districts in Montana set separate quotas for males and females and a few hunting districts do not. The female quotas put in place are important to protect females. The protection of females is important because female survival and mortality rates drive the population trend and because killing a single female may mean the mortality of several mountain lions. If a hunter kills a nursing female mountain lion, her young kittens will die from starvation or dehydration. Additionally, when hunters remove stable adult mountain lions from a population, it attracts young male mountain lions to these vacancies. The immigrating young males often times will kill the kittens from the previous male so they sire their own. In the process, however, females defending their kittens are also frequently killed as well. It is not just the one mountain lion in the hunter's crosshairs who dies: hunting causes a harmful domino effect in mountain lion populations.

Fourth, it is unclear how special license holders will be determined. Will there be a separate lottery or will special licenses just pay more to earn more time to kill mountain lions? Similarly, the motive is also unclear. The most recent science regarding using sport hunting as a management tool for mountain lions finds that hunting these animals doesn't produce the management outcomes sought by state agencies, but instead solely provides a sport hunting opportunity. (Laundré and Papouchis 2020). Specifically, this study found no support for the idea that sport hunting decreases conflict with humans or livestock, and in some cases found that higher kill rates of mountain lions correlate with increased livestock conflict. Finally, the study found no correlation between the use of mountain lion hunting as a management tool and an increased deer population.

This is by no means the first study that has brought these issues to light. Other science exists supporting the idea that sport hunting of mountain lions does not result in a higher ungulate population (Ballard et al. 2001; Hurley et al. 2011). In fact, several studies show that sport hunting as a management tool worsens the very problem it is meant to solve by increasing the rate of mountain lion interactions with both people and livestock. (Lambert et al. 2006; Treves et al. 2016; Peebles et. al 2013).

Finally, it is important that the Commission use current population estimates prior to setting hunting unit quotas and considering the allowance of special licenses unlimited by the quotas set. A recent article in Montana Outdoors described new DNA and computer modeling methods that are being used by MFWP biologists to estimate mountain lion populations (Castle 2021). This same article noted that in the past, FWP had set quotas too high and mountain lion hunters demanded that FWP reduce the annual harvest to increase the population. The Commission

should be wary of raising the quotas and permitting special licenses, which may result in a steep decline in the population which nobody wants, including hunters.

For these reasons, we oppose the proposal to allow special licenses allowing hunters to kill mountain lions throughout the season without quota limitations, at least until a mountain lion management plan in Montana is complete. To the extent that the Commission prematurely approves this proposal, we request that special licenses are extremely limited in number and limited as to location where they can be used.

Sincerely,



Andrea Zaccardi
Legal Director, Carnivore Conservation Program
Center for Biological Diversity
Tel: (303) 854-7748
Email: azaccardi@biologicaldiversity.org

REFERENCE LITERATURE

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Knudsen, Austin

From: Bill Wood <bill@treedupoutfitters.com>
Sent: Friday, March 11, 2022 4:45 PM
To: Knudsen, Austin
Subject: [EXTERNAL] FWP Proposal

FWP is proposing a change to the current mountain lion license structure. Currently region 3 runs off a quota system per LMU(lion management unit). When the quota fills, no more cats can get harvested in that LMU. With this system, as long as a quota is open a cat can get harvested. My permit with the Forest Service allows me to guide in 6 different LMU's so if one is closed we move to another LMU. This plan FWP is proposing to the commission would make hunters specify which LMU they would harvest a cat in so if the LMU their tag is good for closes, they would not be able to go to a different open unit and harvest a lion. This limits hunting but for a resident is not the end of the world. Here is where it gets sticky for me.....

In this proposal, say I book 5 clients for the lion season. Lets just look at client #1, he purchases a license for \$350 and pays me \$6000 to come hunt a mountain lion on December 15th. He designates LMU 320 as his unit to harvest in. Unfortunately for hunter #1, LMU 320 quota fills on December 14th and even though I am permitted in 5 other open LMUs he cannot harvest a lion in any of those so I have to refund his money and he has to cancel his plane and motel reservations. Then hunter #2 is booked for December 20th but on the day he arrives, the unit he has chosen closes. Even though my permit allows me to guide in 4 other open LMUs, he is shit out of luck and has to fly home without hunting and I have to refund his money. Oh and by the way, I have hired a guide for each of these clients that had to apply for time off to guide this week and I have to pay him. I am sure you see the pattern I am getting at.

So what is the solution? I guess I better book every hunter I have for the first week of the season and kill every cat we tree regardless of size and sex just so I can make sure that I am not refunding money that my business and guides are depending on. My only hope is the commission realizes how detrimental this proposal is.

Thank you for taking the time to read this. Let me know if you have any questions.

Bill Wood
Treed Up Outfitters
406-596-7618

From: [Kevin Farron](#)
To: [FWP Wildlife](#)
Subject: [EXTERNAL] Montana BHA comments on PROPOSED 2022/23 Mountain Lion Hunting
Date: Wednesday, March 16, 2022 3:03:51 PM
Attachments: [Montana BHA comments on PROPOSED 2022-2023 MOUNTAIN LION REGULATIONS.pdf](#)

To whom it may concern:

Since the online comment portal is only asking about two parts of the proposed mountain lion changes, there seemed to be no good place to submit these broader comments online.

Instead, we're emailing them here.

Please see attached comments on behalf of the Montana Chapter of Backcountry Hunters & Anglers re: the PROPOSED 2022/23 Mountain Lion Hunting Regulations.

Thank you for your careful consideration,

--

Kevin Farron | Montana Chapter Coordinator

Backcountry Hunters & Anglers

Phone: 406-540-3956

www.backcountryhunters.org [backcountryhunters.org]

The Voice for Our Wild Public Lands, Waters and Wildlife

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**BACKCOUNTRY
HUNTERS & ANGLERS
MONTANA**

March 16, 2022

Wildlife Division
Montana Fish, Wildlife & Parks
PO Box 200701
Helena, MT 59620-0701
fwpwld@mt.gov

Re: Comments on Proposed 2022-23 Mountain Lion Regulations

The Montana Chapter of Backcountry Hunters & Anglers (Montana BHA) represents roughly 3,000 dues-paying sportsmen and women in Montana who value quality recreational opportunities and ethical conduct in the outdoors. Our Chapter values the opportunity to hunt mountain lions in quality habitats and strives to pass our fair-chase traditions to the next generation of responsible hunters. We appreciate the chance to comment.

We oppose the adoption of the Fish and Wildlife Commission's tentative proposal to create a new and overly complex lion hunting season that would split hunters between special permit holders and general license holders.

We stand in opposition as our state is once again looking at an upheaval of our traditional hunting seasons at the expense of our shared and valued lion resource; to the detriment of resident hunters; to the erosion of established and locally attuned hunting practices; and to the sole benefit of none other than the outfitting industry set on allocating our public wildlife to high-paying nonresidents by making Montana the playground for the nation's wealthy elite.



We are confident the current statewide lion seasons are highly effective and broadly supported in meeting lion and hunting management purposes. We see no reason to deviate from what is working well in the state's various regions under careful science-based management and extensive public input. In fact, resident lion hunters from around the state have been vocal in their support, favoring the current regulations over the proposed seasons. Moreover, local interest groups who have a vested interest have not been consulted in developing any of this. The proposal is simply unnecessary, top-down, and runs counter to sound wildlife management including healthy public involvement.

This proposal – following on the heels of other statewide proposals to manage lions floated by FWP in late January – is a solution in search of a problem as the issue it aims to address is poorly defined, let alone justified. It appears to be aimed at overturning the existing hunting season in northwest Montana's region which currently requires a limited-draw permit to hunt lions with a set cap of 10% on nonresident hunters. Thinly disguised under the veil of creating the opportunity to kill more lions as currently achieved, it appears that Fish and Wildlife Commission Pat Tabor of Whitefish - himself an outfitter offering guided mountain lion hunts to nonresidents - is single-handedly ramrodding this proposal. Stripped to its core, the proposal would benefit no one other than nonresident hunters who would be able to easily purchase an unlimited lion license and who disproportionately solicit outfitters' services. Commissioner Tabor has a vested interest in creating more opportunity in his backyard, especially for those high-paying clients itching to hunt in the Treasure State. An outfitted lion hunt can easily fetch upwards of \$5,000 per hunter; Commissioner Tabor's outfitting business, Swan Mountain Outfitters, sells these for \$6,550 per hunter.

History tends to repeat itself, and the lesson learned in Montana is that a quota system with unlimited licenses can be a recipe for disaster, both for the lion population and the hunting public. In areas with good snow and access conditions, such as in northwestern Montana, a quota system with unlimited licenses can lead to fierce competition among



hunters to get to a lion first, with outfitted hunters typically having a stiff upper hand. The harvest quotas are often met on the first day of the season and quota overruns are not uncommon. Moreover, an important factor in mountain lion hunting, this pressured hunt scenario often forces hunters to shoot the first lion they tree, knowing the season may close quickly. In practice, this means more female and younger lions are killed than wildlife managers and resident houndsmen like to see. Favoring quantity over quality to facilitate the financial exploitation of a finite resource is an unwise scheme. This proposal fosters the wrong incentive structure which, in turn, is then used to dictate management decisions.

In summary, we favor the current season structure that evolved over time by creating equitable and fair opportunities for all to a quality lion hunt and by putting the resource first in a principled and justified manner based on sound management of a public trust resource. For some to gain financially at the expense of a devalued opportunity for others is a poor justification to change what is working just fine across the state.

Sincerely,

Thomas Baumeister, Helena, MT
Board Vice Chair & Capital Leader
Montana Chapter of Backcountry Hunters & Anglers

Molly VandeVoort, Columbia Falls, MT
Flathead Board Member
Montana Chapter of Backcountry Hunters & Anglers



From: [Gary Wolfe](#)
To: [FWP Wildlife](#)
Subject: [EXTERNAL] Comment on Proposed 2022-2023 Mountain Lion Regulations
Date: Sunday, March 13, 2022 5:23:00 PM

I am writing in opposition to the proposed new mountain lion season structure which “would allocate harvest between unlimited licenses that will end when a quota is reached and a special limited license that would allow hunts during the same period.”

Mountain lion season structure has long been a subject of intense debate in Montana. The current season structures in place for Regions 1 and Regions 2 were devised to address both biological and social issues. From a biological/wildlife management standpoint, unlimited licenses combined with Lion Management Unit (LMU) quotas historically led to female and male quota overruns in consistent snow areas of R1 and R2 due to the “race” to fill tags before the LMU harvest quotas were filled and the season closed. From a social standpoint, that old system resulted in overcrowding, high levels of competition between hunters, conflicts in the field, and a reduced quality of hunt.

Region 1 went to a permit-only system, while Region 2 adopted a hybrid system—combining both permits and an open season if LMU harvest quotas were not filled by a prescribed date. **Both of those season structures were much better than the old system—improving both lion management and hunt quality.**

I recommend leaving the Region 1 “permit-only” season structure as is, and implementing an identical “permit-only” season structure for Region 2. Due to the fact that lions often move between LMUs, especially when being hunted, I like the idea of allowing permits to be valid in more than one LMU within a Region. The particular aggregation of LMUs would depend upon a variety of topographical and biological factors, and should be recommended by FWP staff during the season setting process.

My recommendations are specific to Regions 1 and 2. I am not familiar enough with the issues and conditions in other Regions to offer recommendations for those Regions.

Thank you for the opportunity to comment on the proposed mountain lion regulations.

Gary J. Wolfe
Former District 1 (R1 and R2) Commissioner

From: wildcountry@jeffb.net
To: FWP Wildlife
Subject: [EXTERNAL] Comment: Lion Management Changes
Date: Monday, March 14, 2022 5:50:19 AM

Commissioners all, (Chair: Leslie Robinson, Patric Tabor, Janna Walter, Pat Byorth, KC Walsh, Brian Cebull, William Lane)

Thank you all for your efforts to bolster our outdoor opportunities in the great state of Montana.

I am a native Montanan 65 years young who has been very active as a hounds man for 30 years. I have been highly involved in the quota system we employ in district 3 and feel the need to comment on the proposed changes put forth. Before I do , I would like to thank Commissioner Byorth for taking the time to attend the district 3 lion meeting in Three Forks.

At the meeting were numerous hounds men, biologists and at least one outfitter /guide. I heard only one positive comment toward these changes all night. With only one person commenting favorably toward permitting a portion of the quota and approximately 20 plus in favor of leaving the quota system as it is, I can see no reason for these proposed changes. In fact, I asked what the "Perceived" benefits of these proposed changes were and received absolutely "no" reply.

There are many questions with these proposed changes. For example, why change a system that has been working well for 30 years (district 3 management)? Why limit a hounds man from hunting anywhere in the state he or she chooses? (After all, Hounds men are the driving force in lion management)? Why the proposed permit system? Do we really want to convert the entire state into the management nightmare of district 2???? Do we want the same number of hounds men competing for even fewer lions after the permit deductions? I could go on and on.

I have a very difficult time finding even one positive aspect of these proposed changes, and feel the best public opportunity is within the current quota system employed outside of districts one and two.

I am a builder, a butcher, a taxidermist, a farmer, and above all a very conscientious outdoors man and hounds man, and thank you all for taking the time to read this.

Josh Pallister
District 3 within the Elkhorn unit
406-431-8142

From: Cole Hage
To: FWP Wildlife
Subject: [EXTERNAL] Mountain Lion Proposal
Date: Tuesday, March 15, 2022 7:29:15 PM

Good afternoon,

I watched the Mountain Lion Season Structure Proposal meeting on 3-15-2022 and would like to share my comments. I believe this proposal would greatly increase the number of nonresident hunters and guides in every unit across the state. Having the Special Unlimited License would allow as many nonresidents to purchase the tag, hire and outfitter, and hunt lions for that given year giving guides and nonresidents more hunting opportunity's, I believe this would make quotas fill faster and allow less opportunity for the residents throughout the state. I think adding a cap of some sort to the amount of nonresident licenses available or amount of guided hunts allowed in a unit would be very beneficial and give resident hunters a better chance to fill a tag and not have to compete as much with outfitters. I also believe the Missoula Management area serves an important purpose in managing lion populations that are close to high people populations while also providing good hunting opportunity's to residents.

Thanks,

Cole Hage

From: [Cody Carestia](#)
To: [FWP Wildlife](#)
Subject: [EXTERNAL] mountain lion proposal comment
Date: Wednesday, February 9, 2022 5:15:30 PM

I'm fine with the proposed changes except for limiting the unlimited lion licenses to a specific area. I feel this is pointless and serves no purpose for any area that provides an unlimited license quota regulated harvest.

I do not see any viable reason to take away hunting opportunity from Montana residents by implementing this. The same number of lions are getting killed via quota regulation in these areas regardless, so management will remain controlled and consistent. Montana is about promoting hunter opportunity and has the best hunter opportunity in the country, why limit that when over harvest is not an issue?

If you want to limit nonresident unlimited tags to a specific area I'm fine with.

I personally live on the edge of Reg 3 and 4 so I regularly hunt lions in both, I can literally turn my dogs loose in Reg 3 and be treed in Reg 4.

Consider our youth hunters, limiting them to only one area when it already requires so much free time away from school, luck and work to kill a lion as is, will not help keep their interest in the sport if they can never get the opportunity to harvest a lion. I own hounds and have run lions the majority of the winter for 20 years and my son did not kill a lion until he was 14 due to school, sports, weather and quotas filling etc etc, it wasn't for lack of trying. We had to travel to a different region when we finally were able to get him one.

Montanans should be able to recreate and hunt in the whole state they pay taxes in and not be forced to choose when there is no over harvest concern.

Cody Carestia
406-490-0973

From: [Robert Brown](#)
To: [FWP Wildlife](#)
Subject: [EXTERNAL] Mountain lion hunting proposals - Region 6
Date: Thursday, March 17, 2022 8:44:16 PM

To the members of the Commission for Montana Fish Wildlife and Parks:

My name is Robert Brown, I reside just south of Havre. Since the year 2000, I have shared many experiences and enjoyed the opportunity we have available hunting mountain lions with my hounds in Region Six as well as other Regions around the state.

I recently had the opportunity to attend a public meeting as well as two web-ex meetings hosted by region six officials and others from Helena explaining the mountain lion harvest season structure proposed by MFWP. I truly appreciate the opportunity MFWP has provided to gain understanding of the proposals that are on the table.

Results from both meetings led me to believe that “Option 2” or “Option 3” would most likely be the management plan that we will abide by in the near future. I have many concerns, especially regarding “Option 3”. My understanding is that the Special Licenses could potentially allow 30% of the established harvest quota. Of that 30%, licenses will be allowed to harvest either male or female mountain lions. With the current sub quota set at two females in HD 690, potentially this could allow for a harvest of up to five females. In regards, HD 690 will not sustain that magnitude of female harvest and continue to allow opportunity that we have had over the past ten years.

On, or around 2008, MFWP established the current management plan that we currently have. For HD 690 a female sub quota was set at 2 female mountain lions. I feel this has been a sustainable and practical plan for HD 690.

It has been stated that “special license holders will hold on to their chance to harvest a trophy mountain lion”. This is speculation, and in small areas within HD 690 and the remainder of region six, the lion population is limited and opportunity to harvest varies based on weather conditions and hunter access. Recent mountain lion harvest history has shown that hunting in HD 690 is opportunist, the houndsmen hunting HD 690 and the remainder of Region 6 are not all “self regulating”. I feel the results of this management plan will only limit my, and others opportunity as a houndsman.

State wide, I am certain that most houndsmen, that are hunting for sport, and that understand the details of this management structure plan will agree that it is not a feasible option for mountain lion hunting opportunity within our state. I would ask that the commission please allow more review and consideration before implementing this proposal into regulation for region six.

Thank you for your time.

Regards,

Robert Brown
406 390 3362

From: [leelaeupple](#)
To: [FWP Wildlife](#)
Subject: [EXTERNAL] Mountain lion hunt. Our cats come out of Canada in North Hill County district 600 where the Milk River comes into the USA.The season closes before we can get a chance at them. I've watched them take calf elk in the past and this year they g...
Date: Wednesday, February 9, 2022 9:19:26 PM

From: [Nancy Ostlie](#)
To: [FWP Wildlife](#)
Subject: [EXTERNAL] Mountain lion and peregrine falcon take
Date: Thursday, February 10, 2022 7:14:02 AM

As a citizen of Montana, entitled to the benefits of a clean and healthful environment guaranteed by the Montana Constitution, I register my objection to any hunting of either mountain lions, an apex predator that we need to control chronic wasting disease in ungulates, or peregrine falcons, which are no doubt threatened like most other native birds by the ongoing Sixth Mass Extinction.

At some point in the near future, the effects of drought and climate warming will stress all wildlife populations to an extent we can't know. My view is that the 'right' to harvest 'game' and other animals in Montana needs to be reviewed in view of the latest science that could help us understand the likely demise of wildlife populations. I recall that the governor and director of FWP have said the agency will no longer do any new science, that we have 'done' science enough already, but that is an inexcusable position to take.

Sincerely,
Nancy Ostlie
Bozeman MT

From: [Trent Sullivan](#)
To: [FWP Wildlife](#)
Subject: [EXTERNAL] Lions
Date: Tuesday, March 15, 2022 5:09:15 PM

Please keep region 2,3,4,5,6,7 all the same with no change. If there are some districts in region 1 that need address do them separately.

Thanks

Trent Sullivan

Sent from my iPhone

From: sawilson1@q.com
To: [FWP Wildlife](#)
Subject: [EXTERNAL] Lions
Date: Thursday, February 10, 2022 6:01:35 PM

To all commissioners: Please remember, lions are the number one Apex ambush predator. After the extensive Lion study in the upper Bitterroots, it was found that we had over 160 lions in hunting districts 250 and [https://urldefense.com/v3/_http://270.It_;!GaaboA!_tceml-W7eqsu0lVC3bqMSYSVOX-Q-B-0GugvK_Ui3ve9P5oiGmtzO9oALNUtWc\\$](https://urldefense.com/v3/_http://270.It_;!GaaboA!_tceml-W7eqsu0lVC3bqMSYSVOX-Q-B-0GugvK_Ui3ve9P5oiGmtzO9oALNUtWc$) was recommended that we increase the lion quotas by 30%. For 3 years. Mike Thompson did that for one year, Shortly after that we met with Mike and ask why we went back to the original 30 lion quota for all Hunting districts in the Bitterroot. That same year Mike testified before the commission, saying, On the order of magnitude a number to large to ignore we have to reduce the lion quota back to the original numbers because the incidentals in the bitterroots had reached 35. He was right but that was for six years not one. We recently went to a three week season to increase the number of mule deer in many hunting districts, at this time we need to liberalize the lion season anyway you can, and increase the lion quotas In all hunting districts in the Bitterroots. If growing more mule deer is truly your objective, this will certainly help.

Thank You. Steve Wilson

Sent from my iPhone

From: [Dan Mahoney](#)
To: [FWP Wildlife](#)
Subject: [EXTERNAL] Lion Proposal Comment
Date: Friday, March 18, 2022 10:10:18 AM
Attachments: [image001.png](#)

Dear Commissioners,

I am reaching out today to express concern for the most recent Mountain Lion proposal. Specifically, I am concerned with the vagueness of language in this proposal, which opens the door for bad actor outfitters and private hunters to take advantage of, and will likely severely limit the areas resident hunters can hunt.

One of the many unique aspects of Montana is the vastness, varied terrain, and areas we can pursue game. This proposal essentially turns each district into a trophy unit, going against Montana's historical status as an opportunity state.

The swiftness and intensity of recent changes at FWP are a little unnerving to say the least.

Hopefully since you as commissioners represent the public here in Montana, you have reached out and have listened to your respective communities to get a well-rounded view of the matters at hand. Until potential ramifications of this proposal are fully understood, I recommend voting against it.

Thank you for your consideration, and for representing us every day Montanans.

Sincerely,

-Dan Mahoney



Daniel Mahoney

Broker

Mobile [406.360.7373](tel:4063607373)

Email dan@livewaterproperties.com

Website www.LiveWaterProperties.com
[\[livewaterproperties.com\]](http://livewaterproperties.com)

From: [walkerhound80](#)
To: FWP Wildlife
Subject: [EXTERNAL] Lion proposal
Date: Wednesday, March 16, 2022 9:24:00 PM

Hello my name is Josh Smith and I am a houndsman in region 6 but also do some running in other regions. I am concerned with the lion proposal option 3 the way the current proposal reads. If option 3 is the direction that the commission should decide to go I feel it is absolutely necessary that it be subject to the female sub quotas for both limited and unlimited special lion licenses. In region 6 where we have small islands of lion habitat and don't have an abundance of lions in the first place to replace resident females that are harvested. I strongly believe that if we do not stick to the sub quota any over harvest on females is going to be detrimental to our population overall. This being said I would prefer to not change our season structure, but if we do I strongly feel we need the limited or drawn tags to be subject to the female sub quota and also need to be specific to the lion management unit not region wide. I also don't think we should have any more than 10% of the tags allocated to the draw.

Thank you very much for your consideration of my comments.

Josh

From: CFirestone@whitefishcu.com
To: [FWP Wildlife](#)
Subject: [EXTERNAL] Mountain Lion Proposal Comment
Date: Tuesday, March 15, 2022 1:30:28 PM
Attachments: [wf_2a371f5f-2b8b-4838-9031-069e1ad85141.png](#)

Good Day!

As a resident mountain lion hunter in Region 1 for 15 years, I'd like to see the Special Limited licenses allocated at the 30% proposal and valid for the entire region. It is very hard to draw a tag now under the current system. It would not be fair to the hunter who has applied for years and acquired bonus points to reduce his chances to 10% draw odds.

I do support changing the tags to region wide vs. the unit system used right now. I've had situations in the past where a cat track crossed a border road from one hunt unit into another. This prevented me from going after the cat and wasting time trying to find another track somewhere else in the draw unit. Snow conditions are not what they used to be and opening the tag to region wide would help a hunter on limited time because of work or school

Thank you for considering my input



Casey Firestone

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