



06 June 2026

## **Comments in Support of Commissioner Brooke's Proposed Amendment to Montana Mountain Lion Hunting Regulations**

Submitted by:

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### **Support for a Science-Based Approach to Mountain Lion Management**

Wolves of the Rockies supports Commissioner Brooke's proposed amendment to replace predetermined mountain lion population reduction targets with a management framework based on current population modeling, biological data, adaptive management, and public involvement.

In 2023, the Commission directed Montana Fish, Wildlife & Parks to reduce mountain lion populations by as much as 30–35 percent across multiple ecoregions over a six-year period. While these directives were intended to address concerns regarding ungulate populations, recent discussions reveal an important reality: Montana Fish, Wildlife & Parks has acknowledged that it has not yet completed the resampling necessary to conclusively determine whether those reduction targets have been achieved.

This raises an important question. If the Department cannot yet verify whether the Commission's reduction objectives have been met, it is reasonable for the Commission to reconsider whether continued management toward fixed reduction targets remains biologically justified.

### **Science Should Inform Management, Not Follow Predetermined Outcomes**

The Department's response to Commissioner Brooke's amendment contains a statement that deserves careful consideration:

\*"Our data cannot dictate the 'right' number of mountain lions to manage towards within the biological extremes of abundance."\*

We agree.

Science can help us understand population trends, survival rates, reproduction, harvest impacts, and ecosystem conditions. Science can inform management decisions. However, science cannot justify arbitrary population reduction goals established years earlier without continual evaluation of current conditions.

The purpose of wildlife science should be to guide management decisions, not simply to achieve predetermined reductions in carnivore populations.

Commissioner Brooke's amendment appropriately shifts the conversation away from percentage reductions and toward current data, population modeling, adaptive management, and biological reality.

### **Caution Regarding Predator Reduction as a Management Tool**

For many years Montana has pursued increasingly aggressive management of large carnivores, often based on the assumption that reducing predators will significantly improve ungulate populations. However, wildlife populations are influenced by many factors, including habitat quality, drought, severe winters, disease, human development, land access, and hunting pressure.

Mountain lions should not become the default explanation for every ungulate management concern.

While targeted management actions may occasionally be appropriate, broad population reduction objectives should not substitute for comprehensive wildlife management strategies that address the full range of factors affecting elk, deer, and moose populations.

### **Public Wildlife Requires Public Accountability**

We also support Commissioner Brooke's recognition of regional public lion management meetings. Montana's wildlife belongs to all Montanans, not solely to one user group or stakeholder interest.

Meaningful public engagement, transparent decision-making, and reliance on the best available science are essential to maintaining public trust in wildlife management.

We encourage the Commission to ensure that future management decisions consider the perspectives of hunters, landowners, wildlife watchers, photographers, conservation organizations, and the broader public who value healthy mountain lion populations as part of Montana's natural heritage.

### **Conclusion**

Wolves of the Rockies believes Commissioner Brooke's amendment represents a positive step toward more adaptive, transparent, and science-based mountain lion management.

At a minimum, the amendment recognizes that wildlife management should not be driven by predetermined population reduction targets when current data remain incomplete. More importantly, it creates an opportunity to move toward a management framework that relies on verified population information rather than assumptions regarding desired levels of carnivore reduction.

Given the uncertainty acknowledged by the Department regarding whether previous reduction goals have been achieved, we encourage the Commission to adopt Commissioner Brooke's

amendment and direct Montana Fish, Wildlife & Parks to pursue the least amount of harvest necessary to maintain healthy, sustainable mountain lion populations while addressing documented management concerns.

Montana's mountain lions are an important component of our wildlife heritage and deserve management that is guided first by science, transparency, and conservation rather than by predetermined reduction objectives.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Marc Cooke', with a stylized flourish at the end.

Marc Cooke  
President  
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**Nothing Follows**