



MOUNTAIN LION FOUNDATION

Saving America's Lion

June 3, 2019

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RE: 2019 Amendments to Chapter 4, Wildlife Regulations, Section 037, Mountain Lions; Regarding season dates, permits authorized, shooting hours and areas open.

Dear Commissioners,

The Mountain Lion Foundation asks that you consider the following concerns raised by the 2019 Amendments to Chapter 4, Wildlife Regulations, Section 037, Mountain Lions proposed by Nebraska Game and Parks Commission for mountain lion (*Puma concolor*) hunting in Nebraska.

Mountain lions have only recently begun to recover in Nebraska after they were exterminated in the state. Nebraska Game and Parks' most recent population estimate of 59 mountain lions in the Pine Ridge region represent all ages, including kittens. Of that small population, around 40 adults and sub-adults would be targeted by trophy hunters. The Commission has proposed to allow hunters to kill a total of 8 mountain lions, with a sub-quota of female lions, or approximately 20% of the known adult population. This limit exceeds what experts have established as sustainable (Maletzke et al. 2014).

During the 2018-19 season, hunters killed three males and two females. Additionally, in the past 12 months, six additional mountain lion deaths were reported in the Pine Ridge region. Without knowing how many kittens would be adding to the population, having a current population estimate, or knowledge of how many mountain lions that migrated to or from the area, holding a second hunt would jeopardize the long-term survival of mountain lions in Nebraska.

The Foundation asserts that:

1. Mountain lion hunting should not be permitted in Nebraska.

Nebraska Game and Parks' recently reported a total of 59 mountain lions in the Pine Ridge region prior to last season's hunt. This estimate included kittens. To subject such a small population to hunting could potentially be disastrous.

Studies have shown that mountain lion populations are self-regulating and that killing established adult lions may actually lead to increased conflict with humans as a result

of the disruption of social structure and increased immigration of dispersing individuals (Teichman et al. 2016).

As a result of hunting, mountain lion populations experience reduced kitten survival rates and a younger overall age structure, increasing the likelihood of conflict with humans (Cooley et al. 2009). Conflicts with mountain lions are exceedingly rare. Allowing a hunt will disrupt resident populations, eventually leading to an increase in conflicts with people, pets and livestock. Additionally, reduced kitten survival will potentially result in a greater than anticipated decline in population, thus compromising the long-term survival of mountain lions in Nebraska.

To ensure healthy social structure and territorial behavior mountain lion populations should not be hunted for trophies or recreation. For this reason, we recommend that the Commission reject the proposed mountain lion hunt.

2. If a hunt is approved, the limit should be reduced to far less than 10% of the known population to account for all human-caused mortality.

Of the 59 total mountain lions in Nebraska, roughly 40 of these individuals are adults or sub-adults that could potentially be pursued and killed by trophy hunters. Put simply, approximately 20% of the known population may be killed by hunters. This far exceed the sustainable limit that has been established by researchers.

In order to sustain viable populations of mountain lions, prevent human-wildlife conflict and avoid compromising long-term viability by failing to account for all human-caused sources of mortality, including vehicle strike, incidental snaring or trapping, public safety removal and so on. hunting of adult lion populations should not exceed the intrinsic growth rate of the population of interest (Beausoleil et al. 2013). The intrinsic growth rate for mountain lion populations is established by science to be between 15-17% (Robinson & DeSimone 2011). Setting human-caused mortality limits at 10% or less of the adult population facilitates the maintenance of home ranges and social stability, reducing the likelihood of increased conflict with humans and population decline (Maletzke et al. 2014).

If, despite the best available science, the Commission approves another hunt in Nebraska, we ask that the limit be reduced to far less than 10% of the adult population to account for additional human-cause mortality, and that hunt units be closed immediately once the geographical limit has been reached to avoid overharvesting and to maintain healthy, stable lion populations.

3. If a hunt is approved, hounds should not be permitted at any time.

Hounding is an inhumane and outdated sport that has been banned in two-thirds of the United States. Hounding poses significant risk to the hounds as well as to young wildlife, including dependent kittens and cubs, who may be attacked and killed by hounds (Lindzey et al. 1992, Logan and Sweanor 2001, Elbroch et al. 2013). Hounds also disturb or kill non-target wildlife and trespass onto private lands (see e.g., Hristienko and McDonald 2007). This practice is not fair chase and is highly controversial even among hunters (Teel et al. 2002).

A review of 30 years of records from game managers throughout the western United States found that most hunters could not tell the size and sex of an animal up a tree. Hunters had roughly 50% accuracy when determining sex, the same as if they had determined the sex with a coin toss.

For the reasons outlined above, we ask that the use of hounds to pursue mountain lions not be permitted at any time.

To summarize, we are asking that the Commission reject the proposed mountain lion hunt as the only recently reestablished population is far too small to sustain a hunt. If, despite the best available science,

the Commission should approve a second hunt, we request that the limit be reduced to far less than 10% of the total adult and sub-adult population and that chase by hounds be fully prohibited.

It would be irresponsible to sanction yet another hunt. If permitted, the hunt could seriously threaten the long-term survival of mountain lions in the state.

The majority of Nebraskans value mountain lions as an important part of their heritage and would prefer not to see them hunted to appease a handful of hunters.

Thank you for your consideration. Please make this comment letter a part of the official record regarding this decision.

Respectfully,



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