



MOUNTAIN LION FOUNDATION

Saving America's Lion

Our mission is to ensure America's lion survives and flourishes in the wild.

The Office of Gov. Spencer J. Cox

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P.O. Box 142220

Salt Lake City, UT 84114-2220

RE: HB0469

March 16, 2023

Dear Governor Cox,

On behalf of our Utah members and concerned supporters nationwide, the Mountain Lion Foundation is asking that you veto HB0469^[1] due to the last-minute amendment made on March 1 — without the opportunity for public hearing and debate. HB0469 allows year-round hunting and trapping of cougars without any mentioned limitations to protect the cougar populations in Utah. This bill will fail to follow the values set by the North American Model for Wildlife Conservation; take management of cougars away from the Utah Division of Wildlife Resources without any notice or comment opportunity being given to the public; allow trapping in Utah for the first time since the bounty period; degrade the cougar populations and ecosystems in Utah; and increase potential public safety risks and livestock losses to cougars.

Under the North American Model of Wildlife Conservation, wildlife is held in public trust with laws and delegations developed by the people, and with management duties being delegated to a wildlife specific state agency — the Division of Wildlife Resources in the case of Utah. Among the model's tenets is that best available science should form the basis for management decisions, that wildlife should only be killed with a legitimate purpose, and that wildlife is an international resource.^[2] HB0469 fails to comply with the tenets of the North American Model by not following the best available science on cougar management, by allowing the excessive and illegitimate killing of cougars — where skinned carcasses may be wasted,^[3] and by potentially degrading the populations shared with surrounding states.

The current status of cougars in Utah allows for the DWR to respond to recent scientific evidence and respond to changing population demographics of wildlife species promptly. The ability to respond promptly to the needs of wildlife in Utah is critical to ensuring healthy and biodiverse ecosystems for generations to come. HB0469 takes this necessary management for cougars away from the DWR, leaving their population susceptible to overharvest — and

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prohibiting the DWR from intervening. Utah DWR routinely seeks public input regarding cougar management and conflict with livestock operators to provide hunting opportunity and support the agricultural community. Additionally, the DWR is conducting research to inform the best management practices for cougars in the state.^[4] As the Utah DWR has evolved over the years, they will continue to improve cougar management in Utah over time — but only if they are allowed to do so.

HB0469 opens up the trapping of cougars, creating a great deal of ethical concerns, with current regulations only requiring traps to be checked every two days, meaning that a cougar may be stuck in a trap for two days.^[6] Due to the size of traps needed to trap cougars, these traps also pose a risk to pets and people. This bill does not provide any guidelines on trapping regulations for cougars, leaving serious safety issues unaddressed.

Hunting deaths do not replace normal mortality causes and can cause mortality rates to dramatically exceed what is needed for population stability. Cougar hunting is additive mortality for cougar population, as it is not in their ecology to be consistent prey for other species. Chief mortality causes for un hunted populations include vehicle strikes, intraspecific conflict, and starvation. Cougar populations subjected to high levels of hunting exhibited increased immigration, reduced kitten survival, a skew towards males in the population, and younger age structures.^[7] The increase of young male cougars into populations specifically causes human-conflict issues as these young males are also more likely to attack livestock. Current evidence strongly suggests that killing more cougars leads to increased levels of conflict in subsequent years.^{[8],[9]}

Increased hunting leaves many cougar kittens orphaned, such as when female cougars are killed when they are not near their kittens. Cougar kittens are supported by their mother often until 18 months of age, and during this support period, juveniles develop the hunting skills necessary to take down deer on their own, while their mother supports them. When kittens are orphaned before they have learned to hunt deer effectively, they run the risk of starvation.^[10] Orphaned juveniles are more likely to seek easy prey in the form of livestock and pets.^[11] The most recent cougar attacks in the United States on children were juvenile cougars in poor condition. The orphaning of these cougar kittens poses a considerable risk to the cougars themselves as well as to public safety.^[12]

HB0469 leaves cougars vulnerable to dramatic overhunting in Utah, and with their decline comes a loss to the considerable ecosystem services that they provide. The carrion provided by cougar kills was shown to provide food for hundreds of species, supporting the entire ecosystem.^[13] Additionally, carnivores prevent competitive exclusion by regulating the populations of species that would otherwise outcompete less competitive species.^[14] Thus, a greater diversity of animals can coexist in the same space. A well-known example of this includes what was seen in Yellowstone after the reintroduction of wolves: The changes in elk behavior in response to wolves allowed for extensive vegetation regrowth, riverbank stabilization, and increased biodiversity.^[15] The positive impacts of large carnivores are often

taken for granted, but the biodiversity that includes cougars is an incredible asset for Utah that should not be taken lightly

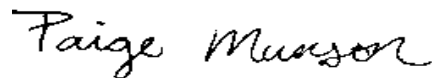
The amendments to HB0469 are opposed by many organizations that support the use of science-based evidence for managing wildlife including the Utah Houndsmen Association, the Utah Wildlife Federation, Heal Utah, Panthera, Center for Biological Diversity, the Humane Society of the United States, the Western Wildlife Conservancy, Wildlife for All, Save our Foothills, Cougar Fund, and the Wild Felid Association, among others. The opposition for this bill is broad, stemming from its failure to abide to the North American Model for Wildlife Conservation, the lack of public engagement, the ethical implications of trapping, the removal of the DWR from cougar management, the severe damage that may be caused to Utah cougar populations, potential public safety and conflict issues that may result from this bill's implementation, the devaluing of the ecological significance of the cougar species, and the damage and disruption to Utah's ecosystems and wild landscapes this bill will cause. Allowing unlimited hunting of cougars won't help other wildlife or the ecosystem as a whole, it won't keep people safe, it won't save livestock, and it won't make hunters and conservationists happy. This bill will help no one. It will jeopardize the public trust of wildlife in Utah, and it will cater to misconceptions about these cats that many cherish sharing their state with.

Please support wildlife in Utah by vetoing HB0469 until the language that removes cougar management capabilities from the Utah DWR is removed.

Sincerely,



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