

After viewing the 2020–21 bobcat and furbearer proposals by Darren Deblois: I support the proposals

Do you have any additional comments about these proposals? Rac members, any way we could make purchase of bobcat tags for Houndsmen to pursue and harvest bobcats without having to buy the furbears license?

After viewing the 2020–21 cougar recommendations by Darren Deblois: I oppose the proposals

Do you have any additional comments about the recommendations? Please take a different look at the numbers of cougar tags as an Houndsmen in the field the cougar population isn't the reason for decline in big game we don't need to keep killing the lions hoping to restore the big game numbers. We have plenty of other factors bears, vehicles, poaching, diseases, management. Thanks for your time

After viewing the 2020–21 bobcat and furbearer proposals by Darren Debloois: I oppose the proposals

Do you have any additional comments about these proposals? THEY ARE OVER REACHING AND WILL END UP HARMING THE NATURAL BALANCE OF THE ENVIRONMENTS THEY TARGETING IN AREAS THAT ARE ALREADY UNDER THE STRAIN OF GLOBAL WARMING

After viewing the 2020–21 cougar recommendations by Darren Debloois: I oppose the proposals

Do you have any additional comments about the recommendations? THEY ARE OVER REACHING AND WILL END UP HARMING THE NATURAL BALANCE OF THE ENVIRONMENTS THEY TARGETING IN AREAS THAT ARE ALREADY UNDER THE STRAIN OF GLOBAL WARMING

Form Name:
Submission Time:

July/August 2020 RAC & Board Feedback Form
July 21, 2020 1:46 pm

After viewing the 2020–21 bobcat and furbearer proposals by Darren Deblois: I support the proposals

After viewing the 2020–21 cougar recommendations by Darren Deblois: I oppose the proposals

Do you have any additional comments about the recommendations?

Dear RAC members,

My name is Cory Huntsman, I am writing this letter on behalf of the Utah Houndsmen Association. We understand the urgent need to work together towards a win/win solution in order to help the recovery of our states suffering deer herds. As houndsmen we recognize that predator populations lag that of their prey and currently the deer numbers have dramatically reduced while lion numbers have remained somewhat consistent. A reduction in these predator numbers will assist in a quicker deer recovery which will translate into healthy lion populations. While the majority of our members are deer hunters too we as well desire to have healthy herd numbers and understand a balance between the predator/prey relationship is required in order to have the best experience in both deer and lion hunting opportunities. With that being said, the UHA supports the overall Division's cougar proposal with a few suggestions that may assist in achieving the goal of reducing lion populations in focused areas quicker. This will aid in a faster recovery of deer population while maintaining the overall respect that this majestic animal deserves. Our membership look forward to the day in which the deer herds return and the focus switches from recovering these herds to recovering lion populations. It is recognized that significant increases in lion harvests could not be accomplished with out the utilization of the skills our membership possess. These suggestions include:

Not supporting the suggestion of multiple lion tags per hunter and reasoning behind this recommendation.

Suggestions on how to focus the hound hunter into the specific area that are in need of immediate lion population reductions.

Maintaining minimal but specific areas for trophy purposes. Very similar to sheep units. This will give the public the opportunity to draw a trophy permit which will maintain the legitimacy of the bonus points system by providing the potential of trophy experiences within the State of Utah.

We do not support the two lion per hunter rule change. While it is doubtful that this population control method will yield a significant increase to the lion harvests numbers, we do believe it will portray a negative perception about the majestic species. It potentially portrays this animal as a vermin to be tossed aside and not to be respected as a managed big game species. It also promotes an increased opportunity for unethical killing of a protected game animal managed by the state DWR. The demand for cougar hunts by legitimate sportsmen is high enough the harvest objectives can be met, if the populations lions exist, by targeting the trophy hunter that will actually use the carcass for a trophy mount and/or process the meat we will maintain the integrity and respect for the species. We do not feel at this point it is necessary to promote wasting Utah game animals by allowing people to kill two cats per year. We can still easily reach our desired quotas without diminishing an ethical hunt.

The next discussion topic is more of a suggestion for the division, board and RAC's to consider more than opposition to a recommendation. There

are 27 units that are either in the Deer or Sheep Predator Management plan this year. If our top concern is getting the cougar numbers in check on our Mule Deer Predator Management units then it seems imperative that we strategically create increased opportunities for these units over other units. One easy way to ensure a strategic plan to assist these units is to take our 8 Harvest Objective units not in a predator management program & convert them into Split Units. The split units do not open to Harvest Objective until February 27th. This strategy would encourage and create opportunity for outfitters and hound hunters to hunt open unlimited units that are in the Mule Deer Predator Management Plan and in need of additional harvest for the first four months of the season (November-February 22).

The last proposal that we oppose is eliminating all of our Limited Entry cougar units. Utah has always had four LE cougar units, this year the Division is recommending eliminating them all. Due to devastating low deer numbers on two of those units we do agree with removing a couple. However, cougars are still considered a trophy game animal and sportsmen have accumulated upwards of 18 preference points. From our understanding, the main reasons for eliminating the LE units is due to the season dates of the associated conservation and draw permits. If left in a LE unit The Divisions concerns are if the winter deer counts came in alarmingly low, they would not have the ability to do mid year emergency tag increase. We feel one simple solution to this would be to put a disclaimer in the Guide Book and/or Permit that states in the event of winter deer counts coming in below the desired threshold, this unit is subject to a mid year emergency tag increase and open to harvest objective beginning February 27th (or whatever the date is for the split season opener for that current year). The two units that we would like to see remain as LE units are Wasatch Strawberry and Oquirrh/Stansbury East. We feel the same amount of cats will be killed on both units, but will give sportsmen a more quality hunt, which they should have with 18 preference points or a \$6000 Conservation permit.

Thank you for your consideration and thank you for your service on the RAC,
Cory Huntsman
Utah Houndsmen Association - President
801-875-5367

After viewing the 2020–21 bobcat and furbearer proposals by Darren Deblois: I oppose the proposals

Do you have any additional comments about these proposals? The UWGA does not want to see bobcat permit numbers decrease or the season shortened.

After viewing the 2020–21 cougar recommendations by Darren Deblois: I support the proposals

Do you have any additional comments about the recommendations? The Utah Wool Growers Association is supporting the DWR's recommendations for increasing cougar tags and implementing 27 additional permits in hunting units that aren't implementing predator management plans. The UWGA would fully support a statewide unlimited quota. Our producers spend 365 days a year on the range observing nature and what we have seen is the rapid increase in predators, especially cougars, and the decline of the deer population. We find that wildlife and agriculture mirror each other. When the sheep move on, the deer experience heavy predation. Frankly, it is our opinion that there should be unlimited tags and unlimited quota until we get the predators in check. The UWGA also supports the DWR recommendation to increase the harvest limit from one to two cougars between July 1 and June 30, 2021.

Form Name:
Submission Time:

July/August 2020 RAC & Board Feedback Form
July 21, 2020 2:25 pm

After viewing the 2020–21 bobcat and furbearer proposals by Darren Debloois: I support the proposals

After viewing the 2020–21 cougar recommendations by Darren Debloois: I support the proposals

Do you have any additional comments about the recommendations? We here at Mule Deer Foundation, UT fully support the Divisions proposal on cougar recommendations.
Jeremy Anderson, Regional Director MDF, UT

After viewing the 2020–21 bobcat and furbearer proposals by Darren Debloois:

I am neutral on the proposals

After viewing the 2020–21 cougar recommendations by Darren Debloois:

I oppose the proposals

Do you have any additional comments about the recommendations?

have reached out to other state the past couple of day regarding lion population. Several states biologist had said the 2 lion tag will not help utah deer numbers. Arizona did this same tag idea a few years back and did NOT work. I talk with Idaho biologists about the lion population and how it affects the deer number. His exact words where killing a the lion will NOT help deer number and Idaho does not have problems with lion number affecting deer numbers. I have put my best effort to reach out with other state get info regarding predators/ pray and how they coordinate with each other. I wish utah DNR would have a better out look toward lion and how they are good thing for wildlife. Please reconsider all of these changes. also like to mention im a big game hunter and enjoy hunt deer,elk and antelope just as much as the next guy,But we need to hit the brakes on these lion increases. Taking out all the lion will help deer herds I repeat will NOT help deer herds. The DNR need to stop taking advice from individuals and who they work with (SFW) that have A complete hatred towards bears and mountain lions. I hope this reaches somebody and they take the time to read it. Thank you concerned outdoorsman

Form Name:
Submission Time:

July/August 2020 RAC & Board Feedback Form
July 22, 2020 9:02 am

After viewing the 2020–21 bobcat and furbearer proposals by Darren Deblois: I oppose the proposals

After viewing the 2020–21 cougar recommendations by Darren Deblois: I oppose the proposals

Do you have any additional comments about the recommendations?

I am a graduate student at Utah State University studying Wildlife Management and Ecology. I care deeply about the sustainability and health of Utah's wildlife populations and ecosystems, and I am writing today to express my opposition to the proposed cougar 2020-2021 cougar recommendations.

Due to Utah Code 23-16-10, the predator management policies newly enacted on many cougar hunt units are out of line with the previously established Cougar Management Plan, now allowing for increased and unlimited cougar harvest from these units. However, the aforementioned Cougar Management Plan directs for decreased or maintained harvest quotas in many of these targeted units, following the two well-established management targets (<40% females in the harvest and >15% of >5yrs in the harvest.) The impacts of this increased and aggressive harvest will likely be damaging to cougar populations statewide, and may have unexpected population repercussions, especially in units where the PMPs are in direct conflict with the previous CMP targets. Attempting to quickly and drastically reduce cougar densities not only impacts the health of the population, it also reduces the opportunity for future sustainable and judicious hunting opportunities for the public.

1) Therefore, I oppose the proposal to Utah Administrative Rule R657-10 to change the season bag limit from one cougar per person to two cougars per person. This change would encourage increased pursuit and harvest in many units which are already heavily hunted, such as the Book Cliffs, Cache, Central Mountains (both Nebo and Northwest), Nine Mile, and Ogden units. These units will already be directly impacted by the new unlimited harvest allowance of the predator management policy. These, and many other units, have often met or exceeded their harvest objective goals in prior years. Thus, increasing the per-person limit to two cougars is an unnecessary and inappropriate method to achieve cougar management goals. In combination with the drastic changes already set in place by the new Predator Management Policy, increasing the season bag limit to 2 cougars per person will negatively impact social structure and stability of local populations that already experience heavy hunting and pursuit pressure. Instead of reducing cougar density as intended, heavy hunting pressure has been shown in previous studies to increase cougar immigration and recruitment in the local populations, shift population structure to younger animals (which are more likely to cause human-wildlife conflict), and allow for higher densities of individuals with smaller home ranges, thus completely failing to obtain the goal of reducing overall cougar densities (Robinson et al. 2008). Additionally, UDWR currently lacks sufficient data on any of these hunt units to support the claim that cougar populations are limiting deer abundance, and thus lacks the proper motivation to support these aggressive measures to reduce cougar density. Until UDWR has collected sufficient data to determine cougar demographic parameters and source-sink patterns in local populations, aggressive harvest is unwarranted and will likely trigger unexpected consequences to population structure and stability. Thus, the two-cougar bag limit should be rejected.

2) As a Wildlife and Ecology graduate student at USU, I understand the

importance of capturing and maintaining a viable sample of study individuals from which to collect data to address research objectives. I am aware of the ongoing Utah Cougar Study being conducted by USU, UDWR, and USDA, which involves collaring and monitoring mountain lions across the state. Regarding R657-10-23 subsection 4, I request that the taking of GPS- or radio-collared cougars from any unit currently in the USU-UDWR Cougar Ecology study be prohibited by law and be prosecutable as a wildlife violation. As a graduate student myself, I understand firsthand the time, cost, and energy involved in capturing animals and collecting sufficient research data, and I believe that UDWR's failure to protect these study animals from harvest during the ongoing capture effort is a waste of time and public resources. If the UDWR is devoting state funding to support a large-scale research study for any managed game species, it should mandate that the animals involved in said study will be protected from take while the capture and monitoring efforts are ongoing. Thus, I encourage this RAC to change the wording in subsection 4 of R657-10-23 to prohibit by law the take of any GPS- or radio-collared cougar in the following cougar units: Cache; Ogden; Morgan-South Rich; Central Mountains-Northwest, Northeast, Southwest, and Southeast; Book Cliffs, East; and Book Cliffs, Rattlesnake Canyon/Nine Mile, South. This change is necessary to ensure that sufficient high-quality data can be collected for addressing the research goals that UDWR and USU have agreed upon.

3) I oppose the removal of the wording "or any cougar accompanied by an adult" from subsection 3 of R657-10-23. I propose that the wording be instead changed to "or any kitten or subadult cougar accompanied by an adult". This subsection of the cougar harvest rule is intended to protect both adult females with dependent young and dependent young themselves from harvest. However, with this line removed, the rule would only protect young kittens with spots and adult females with spotted young. Thus, it would fail to protect larger kittens, between 6-12 months, which are still dependent on their mother for food but have already lost their markings. In the Cougar Guidebook, UDWR defines a kitten as "a cougar less than one year of age, or a cougar accompanied by an adult." Therefore, this line should be modified and retained within the written rule to extend the protection to "large" kittens between 6-12 months of age, which are still wholly dependent on their mother. Cougar age identification between juveniles and adults can easily be incorporated into the provided Cougar Orientation Course so hunters can confidently determine if a treed cougar is a kitten and thus protected from harvest.

4) Finally, I am pleased and proud to live in a state with amazing natural resources and a historically powerful conservation ethic. Like many people in Utah, my family has lived in the West for generations. I do not oppose hunting on principle; I support responsible harvest, ethical sportsmanship, and science-based wildlife management. I am disappointed to see those things I value are not represented in the new predator management policy.

Thank you for considering these requests and comments during future relevant RAC and Wildlife Board meetings.

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Submission Time:

July/August 2020 RAC & Board Feedback Form
July 22, 2020 1:50 pm

**After viewing the 2020–21 bobcat and
furbearer proposals by Darren Deblois:** I support the proposals

**After viewing the 2020–21 cougar
recommendations by Darren Deblois:** I oppose the proposals

Do you have any additional comments about the recommendations?

Regarding R657-10-23 subsection 4, I request that the taking of GPS- or radio-collared cougars from any unit currently in the USU-UDWR Cougar Ecology study be prohibited by law and be prosecutable as a wildlife violation. Significant time, cost, and energy is involved in capturing these animals to collect sufficient research data. Not only are many volunteer houndsmen across Utah putting forth immense effort, cost, time, and risk to help us collar and study these animals, but UDWR employees are also lending their time, vehicles, and on-the-ground support. I believe that failure to protect these study animals from harvest during the ongoing capture and research effort permits a waste of our limited time and public resources. If a state agency is devoting a significant amount of funding to support large-scale research for a managed game species, the agency should mandate that the animals involved in said study will be protected from take while the capture and monitoring efforts are ongoing. This will help ensure the success of the research. That is, however, unless the harvest survival rate of these animals is a specified target objective of the study. In this case, the harvest survival of adult cougars in Utah is not a target goal of the study. My goals, as laid out by USU and UDWR, are to understand the emigration and immigration, seasonal migration patterns, reproductive capacity, predation behavior, and the competitive interactions with scavenging black bears of Utah's mountain lions. I cannot address these goals in a statistically significant way to provide data to UDWR without having a sufficient sample of study animals in all study sites. Due to the high harvest pressure on the major study regions, failure to protect collared study animals from harvest will drastically reduce our ability to maintain a sufficient number of operational collars on the ground for research. With considerable effort, we were able to collar 38 female cougars over the past two winter capture seasons. However, only 17 of the 38 (45%) are still alive and contributing to the study. We have been unable to ever reach our goal of having 30 female cougars collared at one time. This goal was set to provide us with sufficient high-quality data for statistically rigorous analysis and balanced sampling over the three regions of the study. It is clear that capturing and collaring cougars for research is a significant challenge, and we are working extremely hard to keep this viable sample size.

Thus, I encourage the Wildlife Board to change the wording in subsection 4 of R657-10-23 to prohibit by law the take of any GPS- or radio-collared cougar in the following cougar units: Cache; Ogden; Morgan-South Rich; Central Mountains-Northwest, Northeast, Southwest, and Southeast; Book Cliffs, East; and Book Cliffs, Rattlesnake Canyon/Nine Mile, South. This change is necessary to ensure that we can collect sufficient high-quality data to address the research goals that UDWR and USU have agreed upon. Collecting sufficient data is vital to understanding cougar ecology in the state more thoroughly, which will aid in managing cougars throughout Utah at a healthy, sustainable, and biologically-appropriate level for years to come.

I also oppose the proposed change in bag limit from 1 to 2 cougars per person. The changes already in place from the newly-enacted Predator

Management Policies will allow for unrestricted year-round harvest of lions from 25 units. Separately, UDWR has proposed an increase in harvest tags for many other units of the state. Together, these measures will inevitably cause a vast increase in cougar harvest across the state, with the goal of reducing cougar densities. However, increasing the cougar bag limit from 1 to 2 cougars per person is an unnecessary step to achieve these goals of increased harvest, and aggressive overharvest can cause lasting damage to these populations. This would not only destroy the natural and God-given predator-prey balance from our wild lands, but also damage the future opportunity for hound hunters to sustainably hunt and enjoy their chosen sport. Research has shown that aggressive harvest of predators is not likely to reduce densities of predators in populations where extensive immigration occurs, and we do not yet have the data to support making these aggressive changes at this time. In previous studies, aggressive harvest has been linked to a shift in predator demographics to younger age classes (which are more likely to cause human-wildlife conflict), increased immigration as territories open, and higher abundance in a given management space due to smaller individual home ranges. These unintended results would clearly fail to achieve the goals of the policy. Since we do not yet have enough data about Utah cougar's immigration and emigration rates, ignoring the potential source-sink population dynamics of cougars in Utah will render predator control ineffective overall, likely with unintended consequences.

Lastly, I oppose the removal of the wording "or any cougar accompanied by an adult" from subsection 3 of R657-10-23. I propose that the wording be instead changed to "or any kitten or subadult cougar accompanied by an adult". This subsection of the cougar harvest rule is intended to protect both adult females with dependent young and dependent young themselves from harvest. However, with this line removed, the rule would only protect young kittens with spots and adult females with spotted young. Thus, it would fail to protect larger kittens, between 6-12 months, which are still dependent on their mother for food but have already lost their spots. In the Cougar Guidebook, UDWR defines a kitten as "a cougar less than one year of age, or a cougar accompanied by an adult." Therefore, this line should be modified and retained within the written rule to extend the protection to "large" kittens between 6-12 months of age, which are still wholly dependent on their mother. Cougar age identification between juveniles and adults can easily be incorporated into the provided Cougar Orientation Course so hunters can confidently determine if a treed cougar is a kitten and thus protected from harvest.

Thank you for considering these requests and comments.

After viewing the 2020–21 bobcat and furbearer proposals by Darren Debloois:

I support the proposals

Do you have any additional comments about these proposals?

In general, I support the proposals. However, I would like to see overall bobcat quotas significantly reduced.

After viewing the 2020–21 cougar recommendations by Darren Debloois:

I oppose the proposals

Do you have any additional comments about the recommendations?

As a Utah resident and wildlife stakeholder, I am vehemently opposed by the proposals put forth by the Division. They are reminiscent of the days when there was a bounty on our cougars and they were treated as vermin. This is not ethical hunting, nor is it supported by science.

I am asking that the RAC members oppose specifically the increase of 27 permits in non-predator management plan units. I would also like hunter allowance to be restricted to one cougar per hunter rather than the two cat per hunter limit recommended by the DWR. I also ask that predator management plan units have quotas rather than being unlimited. Lastly, I would like to support Mr. Debloois' request that hunters not be permitted to kill collared cougars.

I would like to note that both the current and recommended quotas, while in line with Utah's Cougar Management Plan, are not supported by current research and science and often fail to achieve the desired management outcomes. For example, current research is finding that overhunting cougars, as we are doing in Utah, will likely lead to an increase in conflicts with cougars, people, and domestic animals. Additionally, current research does not support killing cougars to boost game species like mule deer. Instead, it is finding that overhunting may likely be having the opposite effect, instead harming our deer numbers.

Last but not least, Utah residents have been telling the DWR for years that they do not want to see quotas increased. It's time to listen to the desires of the public.

Thank you.

After viewing the 2020–21 bobcat and furbearer proposals by Darren Deblois:

I am neutral on the proposals

After viewing the 2020–21 cougar recommendations by Darren Deblois:

I support the proposals

Do you have any additional comments about the recommendations?

We operate a CWMU in the southeast region and our deer herd has been decimated by lions. A recent university deer study in our area confirmed this. For those of us that spend months on the ground we see a lion track for every heard of deer. We completely support the DWR having the authority to act quickly to manage the lion population in areas of need. Arizona has been issuing over the counter year long licenses for years and his done great things to keep a healthy big game population. This should be made a permanent change to the lion harvesting in Utah.

Form Name:
Submission Time:

July/August 2020 RAC & Board Feedback Form
July 24, 2020 12:08 pm

After viewing the 2020–21 bobcat and furbearer proposals by Darren Deblois: I support the proposals

After viewing the 2020–21 cougar recommendations by Darren Deblois: I oppose the proposals

Do you have any additional comments about the recommendations?

Dear Chairman Hedin and Regional Advisory Council members,

The Mountain Lion Foundation provides the following comments on cougar hunting in Utah for the 2020-21 season. We represent over 8,000 supporters nationwide.

The Utah Division of Wildlife Resources (DWR)'s cougar hunting recommendations for the 2020-21 season are overly aggressive and not based on scientific fact or reason. We urge you to advise the Utah Wildlife Board to suspend or significantly reduce the hunting of cougars, especially females, in Utah.

- Hunting cougars does not lead to management objectives of increasing deer and elk numbers.
- Female cougars contribute disproportionately to the population and should not be hunted.
- Cougar hunting season should be delayed to December 1st to reduce kitten mortality.
- No credible scientific evidence supports the notion that the indiscriminate killing of cougars serves any genuine interest in managing the species and likely leads to increased conflicts with humans and livestock.

I. Hunting cougars does not lead to management objectives of increasing deer and elk numbers.

Hunting cougars has long been thought to bolster populations of game species like deer, while reducing competition for this shared resource. However, recent studies that evaluated the impacts that heavy hunting of cougars has on deer and elk found that hunting cougars does not increase deer populations. In many cases, the hunting activity of cougars is actually beneficial to prey animal populations, like deer and elk. Cougars often prey on sick or weak animals because they require less energy expenditure to capture. This helps to remove diseased animals and weaker genes from the breeding population.

One study, published in February of this year, looked at cougar effects on deer populations using data from California, where cougar hunting has been prohibited since 1972, as a control and compared this data to cougar data from other state and federal agencies where cougar hunting is permitted. They tested the hypothesis that sport hunting of cougars should reduce cougar populations and result in an increase in deer and elk population numbers. The study found no evidence to support the hypothesis with deer densities, and fluctuations thereof, being similar between California and states where cougar hunting is permitted.

Another study, conducted in Yellowstone National Park, found that heavy hunting pressure on cougars had the opposite effect on mule deer populations. As trophy hunters often target the large, dominant male, they inadvertently reduce the age structure of cougar populations leaving younger, less experienced cougars on the landscape. The study found that

these younger predators typically selected for mule deer instead of larger prey species like elk. As a result, the researchers noted that, despite increased survival of fawns and females, the removal of cougars did not yield a growth in the mule deer population. Instead, they suggested that hunting cougars may actually be increasing the number of cougars that target deer.

On the East Coast of the United States, it has become clear that when cougars are extirpated, deer populations do increase. However, it is not true that simply decreasing the number of cougars will cause deer populations to increase or remain healthy over the long term. Cougars and deer have co-evolved to create a natural balance. Availability of suitable habitat, connectivity, and changes in climate (e.g. harsh winters) will continue to determine deer numbers and lion numbers will fluctuate in response, unless cougars are nearly extirpated. In other words, an agency cannot adjust prey numbers by reducing predators without risking extirpation of the predator population.

We urge you to advise the Utah Wildlife Board that a reduction in deer numbers is likely a proximate cause of the harsh winter and not due to increased cougar predation. Advise the Board not to implement predator management plans, which persecute cougars. Hunting cougars year-round under the guise of a "predator management plan" is unsustainable and unethical. We also ask you to urge DWR Director Fowlks to repeal the spot-and-stalk hunt he approved for this year from August 1, 2020 - December 31, 2020.

II. Female Cougars contribute disproportionately to the population and should not be hunted.

Cougars are a long-lived, k-selected species in which females contribute disproportionately to the population. Female mortality can have disproportionate negative influences on population stability and growth. If too many females are removed from a population, the population can become unstable and collapse. Removing more than 20% of adult females (natural mortality and hunter harvest) from any given population is likely to lead to population instability. Therefore, total hunter harvest of adult females should not exceed 15-20% to account for natural mortality. The Utah Cougar Management Plan V.3 2015-2025 aims for a female harvest of 40% of the estimated population. This is not sustainable and does not account for natural mortality. If female harvest continues at this rate, there could be devastating effects to Utah's cougar populations. Female harvest should not exceed 15-20% of the estimated population size.

We urge you to advise the Utah Wildlife Board to amend the current cougar management plan and stop female harvest or to reduce the number to 15-20% of the estimated population.

III. All cougar hunting seasons should be delayed to December 1st to

reduce kitten mortality.

Cougar kitten survival rates are low by nature. Hunting of cougars only leads to an increase in kitten mortality in heavily hunted populations. Killing an adult female with kittens or cubs results in the death of her dependent young by dehydration, malnutrition, predation and exposure; even those who are at least six months to a year old. Removing too many adult females can impact a population's ability to recruit new members making the population less resilient to hunting and other human- and natural-caused mortality.

While it is not permitted in Utah to kill any females accompanied by spotted kittens, dependent young, especially during the denning period, are not always in the presence of their mother. Without kittens in her presence, a hunter may not be aware that a female has offspring and may kill her. As cougar kittens are dependent on their mothers for survival up to 18 months of age, the loss of their mother prior to reaching adulthood would likely result in the death of her young, even if they are around a year old.

A recent study showed that delaying the start of hunting seasons until December 1st could protect up to 91% of kittens from dying as a result of being orphaned by hunters. By better aligning any hunting seasons with denning periods, hunters will have the best opportunity to identify females with dependent young and reduce the likelihood of orphaning kittens.

We ask you to advise the Utah Wildlife Board to delay any hunting season to December 1st of each year.

IV. Hunting cougars is an ineffective management strategy because populations are self-regulating.

Except in rare instances, cougar populations do not require management to control growth because their populations are self-regulating. This is driven by cougar social structure, territoriality, the abundance of prey, and the carrying capacity of the land to support those populations. Human encroachment on wild land leads to habitat loss and reduced connectivity, resulting in a lower carrying capacity for predator and prey species.

Cougars occur at low densities relative to their primary prey. Like most large carnivores, they maintain large territories to defend resources necessary for survival and reproduction, such as access to food, water, shelter and mates. Therefore, when prey populations and suitable habitat decline, so do cougar populations. Because of these predator-prey and population dynamics, cougar populations do not need to be managed by humans and should not be hunted for sport.

Even though it is an ineffective management tool, hunting is unfortunately still the greatest source of mortality for cougars throughout the majority of their range in the United States. Hunting cougars results in additive

mortality - rates that far exceed what would happen in nature - and can lead to population instability and decline.⁵

In order to sustain viable populations of cougars, prevent human-wildlife conflict, and avoid compromising the long-term viability of cougar populations by failing to account for all human-caused sources of mortality, hunting of adult lion populations should not exceed the intrinsic growth rate of the population of interest.

The intrinsic growth rate for cougar populations is established by researchers to be between 15-17%. Assuring that human-caused mortality is limited to well below this threshold facilitates the maintenance of home ranges and social stability, reducing the likelihood of increased conflict with humans and population decline.

Any quota established by DWR must not exceed the widely accepted sustainable threshold of 12-14% for total anthropogenic loss within a population.

Based on the information in this letter, the Mountain Lion Foundation respectfully insists that the Central Region RAC members consider the following concerns and urge the Utah Wildlife Board to make the changes below:

- Repeal the spot-and-stalk hunt (August 1, 2020 - December 31, 2020) implemented by Director Fowlks.
- Stop current predator management plans throughout the state as these will not achieve the management objective of increasing deer population numbers.
- Stop female harvest or reduce female harvest to 15-20% of the estimated population size and retire the current 40% objective which is unsustainable.
- Delay the start of all cougar hunting seasons in all areas until December 1st each year to protect dependent kittens from being orphaned by hunters.
- Require that any quota established by the Utah Wildlife Board not exceed 12-14% for total anthropogenic loss within a population, based on the current population estimate.

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

Respectfully,

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Debra Chase

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These comments will be submitted via email as well.

After viewing the 2020–21 bobcat and furbearer proposals by Darren Debloois:

I am neutral on the proposals

After viewing the 2020–21 cougar recommendations by Darren Debloois:

I oppose the proposals

Do you have any additional comments about the recommendations?

The UWGA does not support the prohibition of harvesting collared lions. We strongly believe that the status quo should be maintained that, while it is discouraged to harvest any collared wildlife, it should not be illegal, and we should stick with biologists recommendations against any restrictions. We understand that lions are collared to facilitate data collection in different studies statewide, and there is a cost associated with capturing and collaring the lions. However, we strongly believe that by limiting the harvest of collared lions it will skew the data about the lion population which in turn biases the study and has the potential to invalidate the findings. The data needs to reflect that some lions are taken by sportsmen, some are hit by cars, some are taken under depredation tags etc. It is systematically flawed to cherry pick data. Lions are hard to kill in the summer when they are primarily killing sheep. Those depredating lions are, more often than not, harvested in the winter long after the sheep have gone and they are now killing deer. That doesn't change their need for removal. A collar doesn't make a lion any more valuable and it would be wrong to exempt them from removal. Livestock producers desperately need sportsmen to facilitate these harvests.
