

Form Name:  
Submission Time:

July/August 2021 RAC Feedback  
July 15, 2021 4:52 pm

**Which best describes your position regarding the 2021–22 furbearer recommendations?** Strongly disagree

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**Do you have any additional comments about these recommendations?** Allowing hunting in Utah makes this state look bad.

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**Which best describes your position regarding the 2021–22 cougar recommendations?** Strongly disagree

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**Do you have any additional comments about these recommendations?** Why does Utah have to be a hunting state? To accommodate stupid people?

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Form Name:  
Submission Time:

July/August 2021 RAC Feedback  
July 16, 2021 9:09 am

**Which best describes your position regarding the 2021–22 cougar recommendations?**

Strongly agree

**Do you have any additional comments about these recommendations?**

First, I'm glad the DWR is increasing cougar tags but it doesn't seem like the increase is enough to help the struggling deer herds recover.

Second, \$30 for the spot and stalk is way over priced. This hunt will have a .01% harvest and about the same number of hunters will buy the tag for that price. Reduce the tag to \$10 and it increase tag sales exponentially. The harvest rate wont change much but it will keep some from illegally shooting a cougar and buying a tag after.

Form Name:  
Submission Time:

July/August 2021 RAC Feedback  
July 16, 2021 10:15 am

**Which best describes your position regarding the 2021–22 furbearer recommendations?** Strongly disagree

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**Do you have any additional comments about these recommendations?** Yes I do Stop the murder of these beautiful animals..wth you even kill them they have every right to exist in the wild,STOP!!!!

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**Which best describes your position regarding the 2021–22 cougar recommendations?** Strongly disagree

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**Do you have any additional comments about these recommendations?** Quite why you even have a hunt?,stop and leave them alone it's their right just as anyone else.ranchers,sport hunters and their dogs?? I take it.typical for Utah cruelest state I've ever seen!?

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**Which best describes your position regarding the 2021–22 furbearer recommendations?**

Strongly disagree

**Do you have any additional comments about these recommendations?**

I strongly oppose proposals to lengthen the Bobcat hunting/trapping season, and I strongly oppose increasing the number of permits per person. With the megadrought affecting Utah and several consecutive years of damaging wildfire season, the bobcat and other furbearing animal population should allow for an increase in numbers as a buffer against the current harsh conditions. Moreover, while I come from a hunting family, trapping is a cruel and indiscriminate killing method and should be abolished, certainly not expanded in any way. Thank you.

**Which best describes your position regarding the 2021–22 cougar recommendations?**

Strongly disagree

**Do you have any additional comments about these recommendations?**

I strongly disagree with the many unlimited kill (harvest) objectives for cougars recommended in these proposals, and that these proposals are to be continued for three years. Drought, habitat loss, wildfire and road accidents are greatly affecting prey population decline. I often travel from Salt Lake to Cache Valley and the deer killed on the highways are constant and many. Sometimes three deer at once have been hit and killed. I believe it was a DWR study on mule deer populations that showed drought and habitat destruction - partly from increasing road access- were the greatest factors in the decline of mule deer. Chronic wasting disease is out of control. A Colorado study showed cougars take out deer with CWD. Hunters don't. Where is the study that shows what percentage of prey are killed by cougars? In short these harvest objectives are flawed and shortsighted and will not help the prey population rebound, only kill majestic and ecologically essential predators.

**Which best describes your position regarding the 2021–22 furbearer recommendations?**

Strongly disagree

**Do you have any additional comments about these recommendations?**

Trapping is a cruel and dishonorable method of killing animals. When applied to bobcats, it isn't even being employed to provide a food source. Rather a taxidermy trophy. Trapping also frequently harms a s kills animals (and sometimes people) other than its intended target. Without empirical data showing an overpopulation of bobcat and negative fallout for other species directly due to it- there is no good reason to increase the permits available for these majestic and ecologically important creatures.

**Which best describes your position regarding the 2021–22 cougar recommendations?**

Strongly disagree

**Do you have any additional comments about these recommendations?**

The legislation passed in 2020 regarding predator control and predator management is in violation of the DWR mandate to maintain healthy cougar populations for the enjoyment of various user groups including non-hunters. As a non-hunter I demand that my feedback be taken into consideration in the management plan, as well as any other policy documents or proposed changes to the 2021-22 cougar harvest. Current management strategies and policies are heavily biased toward hunters and are not in compliance with the agency's mandate. The DWR is required to solicit and give weighty consideration to the feedback and interests of non-hunters and other groups advocating for cougar protection. As it currently stands, the DWR is almost exclusively serving the special interest of hunters, not the entire user group the DWR is mandated to serve. Predators such as cougars are under severely pressure at this time due to drought, wildfire, over-hunting and a limited prey base. Further protection for this wildlife species needs to be enacted, not further over-harvesting. Cougars cannot maintain any resemblance of a healthy genetically diverse population if the over-harvesting that took place last year, is maintained at the same level or increased as noted in the proposed changes. The DWR is responsible for managing for all Utahans and must not adopt or approve of these changes to policy. I strongly object to last year's legislation, as well as the actions of the Director to further reduce the already frighteningly low numbers of cougars in our state. Do not enact these heavily biased, illegal and grossly negligent changes in policy or management strategy. Revise your management plan to reflect a more balanced approach that more equitably represents the needs of non-hunters.

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**Which best describes your position regarding the 2021–22 furbearer recommendations?**

Strongly disagree

**Do you have any additional comments about these recommendations?**

I strongly object to adopting the proposed recommendations for bobcat harvest next year increasing the harvest of bobcats. The proposed changes are based on a short-term analysis and are without scientific merit. Unforeseen environmental challenges for these animals have arisen including severe drought and wildfires, which have resulted in adverse impacts to bobcat habitat. Bobcats need more time to reach stable healthy populations before any policy changes are proposed that would decrease their numbers. Do not increase the bobcat season or adopts any changes that would add to the take of bobcats in the state when these animals are already up against such overwhelming environmental obstacles.

Form Name:  
Submission Time:

July/August 2021 RAC Feedback  
August 1, 2021 10:15 am

**Which best describes your position regarding the 2021–22 furbearer recommendations?** Strongly disagree

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**Do you have any additional comments about these recommendations?** The government must buy more open space to make up for loss of wildlife habitat to developers. These creatures were here long before us and deserve to thrive and coexist with humans.

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**Which best describes your position regarding the 2021–22 cougar recommendations?** Somewhat disagree

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**Do you have any additional comments about these recommendations?** The government must buy more open space to make up for loss of wildlife habitat to developers. These creatures were here long before us and deserve to thrive and coexist with humans.

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**Which best describes your position regarding the 2021–22 furbearer recommendations?** Strongly disagree

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**Do you have any additional comments about these recommendations?** No science to back the target numbers. Utah is far behind in how other states are managing wildlife. Utah continues establish targets based on the needs of special interest groups (trappers, hunters and the livestock industry) and not proven science. Futhermore, trapping is cruel (research also backs this) and outdated method of wildlife management (killing)that serves no purpose other than inflicting pain and suffering for entertainment.

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**Which best describes your position regarding the 2021–22 cougar recommendations?** Strongly disagree

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**Do you have any additional comments about these recommendations?** No science to back the target numbers. Utah is far behind in how other states are managing wildlife. Utah continues establish targets based on the needs of special interest groups (trappers, hunters and the livestock industry) and not proven science.

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Form Name:  
Submission Time:

July/August 2021 RAC Feedback  
August 5, 2021 4:28 pm

**Which best describes your position regarding the 2021–22 furbearer recommendations?** Strongly disagree

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**Which best describes your position regarding the 2021–22 cougar recommendations?** Strongly disagree

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Form Name:  
Submission Time:

July/August 2021 RAC Feedback  
August 5, 2021 11:18 pm

**Which best describes your position regarding the 2021–22 cougar recommendations?**

Somewhat disagree

**Do you have any additional comments about these recommendations?**

Hello, while I respect hunters and ranchers, I believe the permits for hunting cougars should be drastically lowered, as they are an important part of the ecosystem. Thank you.

Form Name:  
Submission Time:

July/August 2021 RAC Feedback  
August 6, 2021 9:02 am

**Which best describes your position regarding the 2021–22 furbearer recommendations?** Strongly disagree

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**Which best describes your position regarding the 2021–22 cougar recommendations?** Strongly disagree

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Form Name:  
Submission Time:

July/August 2021 RAC Feedback  
August 10, 2021 10:16 am

**Which best describes your position regarding the 2021–22 furbearer recommendations?** Strongly disagree

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**Do you have any additional comments about these recommendations?** Do not remove the cap for number of permits given out, and keep the number per permit at 4. If we are still in the bottom of the range then increasing these numbers will only encourage trophy hunting and place us back below the healthy range of this already fragile population.

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**Which best describes your position regarding the 2021–22 cougar recommendations?** Strongly disagree

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**Do you have any additional comments about these recommendations?** Research has shown that trophy hunting cougars does not boost big game populations. Moreso, it often invites conflict with humans, pets and livestock.

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Form Name:  
Submission Time:

July/August 2021 RAC Feedback  
August 10, 2021 10:26 am

**Which best describes your position regarding the 2021–22 furbearer recommendations?** Strongly disagree

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**Which best describes your position regarding the 2021–22 cougar recommendations?** Strongly disagree

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Form Name:  
Submission Time:

July/August 2021 RAC Feedback  
August 10, 2021 10:32 am

**Which best describes your position regarding the 2021–22 furbearer recommendations?** Strongly disagree

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**Do you have any additional comments about these recommendations?** I don't agree with trophy hunting, but even if I did the numbers don't show a good enough come back to warrant more permits and a longer season. Utah needs more wildlife, including predators not less.

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**Which best describes your position regarding the 2021–22 cougar recommendations?** Strongly disagree

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**Do you have any additional comments about these recommendations?** Mortality rates are up and as with the other native wildlife, we need more not less, including predator species.

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Form Name:  
Submission Time:

July/August 2021 RAC Feedback  
August 10, 2021 10:36 am

**Which best describes your position regarding the 2021–22 cougar recommendations?** Strongly disagree

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**Do you have any additional comments about these recommendations?** Animal abusers and those retarded idiots that condone such insane behavior should be locked up in a mental institution.

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Form Name:  
Submission Time:

July/August 2021 RAC Feedback  
August 10, 2021 10:38 am

**Which best describes your position regarding the 2021–22 furbearer recommendations?**

Strongly disagree

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**Do you have any additional comments about these recommendations?**

Animal abusers and those retarded idiots that condone such insane behavior should be locked up in a mental institution.

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Form Name:  
Submission Time:

July/August 2021 RAC Feedback  
August 10, 2021 10:39 am

**Which best describes your position regarding the 2021–22 furbearer recommendations?** Strongly disagree

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**Which best describes your position regarding the 2021–22 cougar recommendations?** Strongly disagree

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Form Name:  
Submission Time:

July/August 2021 RAC Feedback  
August 10, 2021 10:47 am

**Which best describes your position regarding the 2021–22 furbearer recommendations?** Strongly disagree

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**Which best describes your position regarding the 2021–22 cougar recommendations?** Strongly disagree

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Form Name:  
Submission Time:

July/August 2021 RAC Feedback  
August 10, 2021 10:49 am

**Which best describes your position regarding the 2021–22 furbearer recommendations?** Strongly disagree

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**Do you have any additional comments about these recommendations?** you shouldnt kill anything but your yahoo hunters that are kill happy  
Maybe their heads should be hung on a wall

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**Which best describes your position regarding the 2021–22 cougar recommendations?** Strongly disagree

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**Do you have any additional comments about these recommendations?** if you are so concerned about mule deer populations why doesnt the state have a buffer zone around National Forest and Parks for wildlife. Tell your senators and reps to quit handing out building permits and catering to the developers and tell the fake gov to quit bending over for big corps and tax benefits to come in and squander off what was once a beautiful state. Quit breeding and pay attention to the big picture. Our wild life in in huge trouble and you yahoos just want to go kill stuff, You all make me sick!

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Form Name:  
Submission Time:

July/August 2021 RAC Feedback  
August 10, 2021 11:03 am

**Which best describes your position regarding the 2021–22 furbearer recommendations?** Strongly disagree

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**Which best describes your position regarding the 2021–22 cougar recommendations?** Strongly disagree

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Form Name:  
Submission Time:

July/August 2021 RAC Feedback  
August 10, 2021 11:03 am

**Which best describes your position regarding the 2021–22 furbearer recommendations?** Strongly disagree

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**Which best describes your position regarding the 2021–22 cougar recommendations?** Strongly disagree

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Form Name:  
Submission Time:

July/August 2021 RAC Feedback  
August 10, 2021 11:10 am

**Which best describes your position regarding the 2021–22 furbearer recommendations?**

Strongly disagree

**Do you have any additional comments about these recommendations?**

All trapping and "harvesting" of living beings is cruel and I believe totally unnecessary. We share this planet with other creatures. Other than helping to stop preventable diseases, we should respect the lives of these creatures. After all, they share this world and this land was their home long before it became ours.

**Which best describes your position regarding the 2021–22 furbearer recommendations?** Strongly disagree

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**Do you have any additional comments about these recommendations?** I strongly oppose bobcat trophy hunting. The target numbers you present are barely within range and only for two of the targets. Increasing the season length and number of permits does not make sense.

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**Which best describes your position regarding the 2021–22 cougar recommendations?** Strongly disagree

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**Do you have any additional comments about these recommendations?** I strongly oppose cougar trophy hunting. The data trends suggest that the predator population is already decreasing and increasing harvest rates seems inappropriate.

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**Which best describes your position regarding the 2021–22 furbearer recommendations?** Strongly disagree

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**Do you have any additional comments about these recommendations?** Killing is not conservation. I live in an area that is a high risk for wildfires. Traps present a huge hazard to domestic and wild animals attempting to flee fires and are a safety concern for our firefighters. Traps should be forbidden and managing wildlife by killing should be illegal.

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**Which best describes your position regarding the 2021–22 cougar recommendations?** Strongly disagree

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**Do you have any additional comments about these recommendations?** Killing is not conservation. I live in an area that is a high risk for wildfires. Traps present a huge hazard to domestic and wild animals attempting to flee fires and are a safety concern for our firefighters. Traps should be forbidden and managing wildlife by killing should be illegal.

---

**Which best describes your position regarding the 2021–22 furbearer recommendations?**

Strongly disagree

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**Do you have any additional comments about these recommendations?**

The goal of this proposal is to diminish the state's native carnivore population in the hope of boosting deer and bighorn sheep populations so hunters can kill these animals themselves. However, research shows trophy hunting cougars does not boost big game populations and invites conflict with humans, pets, and livestock. Trophy hunting is not only unnecessary, but it is also incredibly cruel. Hunters may utilize hounds to hunt cougars, and bobcats are often left severely injured in traps for days before the trapper comes to kill them.

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**Which best describes your position regarding the 2021–22 cougar recommendations?**

Strongly disagree

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**Do you have any additional comments about these recommendations?**

The goal of this proposal is to diminish the state's native carnivore population in the hope of boosting deer and bighorn sheep populations so hunters can kill these animals themselves. However, research shows trophy hunting cougars does not boost big game populations and invites conflict with humans, pets, and livestock. Trophy hunting is not only unnecessary, but it is also incredibly cruel. Hunters may utilize hounds to hunt cougars, and bobcats are often left severely injured in traps for days before the trapper comes to kill them.

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**Which best describes your position regarding the 2021–22 furbearer recommendations?** Strongly disagree

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**Do you have any additional comments about these recommendations?**

The goal of this proposal is to diminish the state's native carnivore population in the hope of boosting deer and bighorn sheep populations so hunters can kill these animals themselves. However, research shows trophy hunting cougars does not boost big game populations and invites conflict with humans, pets and livestock. Trophy hunting is not only unnecessary, it is also incredibly cruel. Hunters may utilize hounds to hunt cougars, and bobcats are often left severely injured in traps for days before the trapper comes to kill them.

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**Which best describes your position regarding the 2021–22 cougar recommendations?** Strongly disagree

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**Do you have any additional comments about these recommendations?**

Research shows trophy hunting cougars does not boost big game populations and invites conflict with humans, pets and livestock.

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Form Name:  
Submission Time:

July/August 2021 RAC Feedback  
August 10, 2021 11:35 am

**Which best describes your position regarding the 2021–22 furbearer recommendations?** Strongly disagree

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**Which best describes your position regarding the 2021–22 cougar recommendations?** Strongly disagree

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**Which best describes your position regarding the 2021–22 cougar recommendations?**

Somewhat disagree

**Do you have any additional comments about these recommendations?**

Utah's cougar population is roughly 1,600 animals and declining due to increased trophy hunting and more than likely, habitat loss (I know of 2 cougars that DWR killed in the Heber Valley last year because the cougars had the audacity to walk through a brand new neighborhood that used to be farmer's fields at 3am and every resident there caught it on their ring cameras and had a meltdown that the cougars were going to kill their children.). You took 702 cougars last hunting season. Why are you trying to cut this population in 1/2? I know it is partly due to having enough deer and elk for hunters to kill, but, I think we are ignoring other issues that are affecting deer and elk populations. Approximately 6,000 - 10,000 deer are killed by cars each year. We are also in the midst of a terrible drought (since 2018-ish), last year we saw 329,732 acres burn and had an extremely harsh winter in 2019. Utah also had more than 1,000 animals (that we know of) poached last year. And, we have chronic wasting disease, since October of 2020, 118 deer and 2 elk tested positive for chronic wasting disease. Don't you think some of this could also be part of the cause of deer and elk numbers declining? I do not support cougar hunting numbers increasing.

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Form Name:  
Submission Time:

July/August 2021 RAC Feedback  
August 10, 2021 11:53 am

**Which best describes your position regarding the 2021–22 furbearer recommendations?** Strongly disagree

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**Do you have any additional comments about these recommendations?** Nature does a better job in balancing prey and predator populations.

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**Which best describes your position regarding the 2021–22 cougar recommendations?** Strongly disagree

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**Do you have any additional comments about these recommendations?** Nature does a better job in balancing prey and predator populations.

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Form Name:  
Submission Time:

July/August 2021 RAC Feedback  
August 10, 2021 12:05 pm

**Which best describes your position regarding the 2021–22 furbearer recommendations?** Strongly disagree

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**Which best describes your position regarding the 2021–22 cougar recommendations?** Strongly disagree

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Form Name:  
Submission Time:

July/August 2021 RAC Feedback  
August 10, 2021 12:33 pm

**Which best describes your position regarding the 2021–22 furbearer recommendations?** Somewhat disagree

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**Do you have any additional comments about these recommendations?** They were here first and by Not allowing mother nature to take the natural course we rec the natural ecosystem

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**Which best describes your position regarding the 2021–22 cougar recommendations?** Somewhat disagree

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**Do you have any additional comments about these recommendations?** They were here first and we need to let mother nature regulate so that we don't destroy our own ecosystem

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**Which best describes your position regarding the 2021–22 furbearer recommendations?** Strongly disagree

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**Do you have any additional comments about these recommendations?** Trophy hunting is not only unnecessary, it is also incredibly cruel. Hunters may utilize hounds to hunt cougars, and bobcats are often left severely injured in traps for days before the trapper comes to kill them. This is inhumane and needs to stop they are creatures of the creator and deserve life just like we do

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**Which best describes your position regarding the 2021–22 cougar recommendations?** Strongly disagree

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**Do you have any additional comments about these recommendations?** Trophy hunting is not only unnecessary, it is also incredibly cruel. Hunters may utilize hounds to hunt cougars, and bobcats are often left severely injured in traps for days before the trapper comes to kill them. They are creatures of life and deserve life just like we do in fact they were here before we were

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Form Name:  
Submission Time:

July/August 2021 RAC Feedback  
August 10, 2021 12:46 pm

**Which best describes your position regarding the 2021–22 furbearer recommendations?**

Strongly disagree

**Do you have any additional comments about these recommendations?**

I do not consent. Who gives you the right to place a lower value on the lives of these animals.

Apparently, you're just out to make a buck off of deer hunting, etc. Who gave you the right choose who shall live and who shall die. Communism at its best. It is apparent that if it doesn't serve you, you seek to destroy it. Are you only concerned about your pocket book and deer season. It's been a rough year for everyone, including the wildlife. I believe they should be left alone. I believe there should be no licenses to kill these animals. You speak of "harvest" as if it's a good thing. It's never been a good thing.

**Which best describes your position regarding the 2021–22 cougar recommendations?**

Strongly disagree

**Do you have any additional comments about these recommendations?**

I do not consent. Who gives you the right to place a lower value on the lives of these animals.

Apparently, you're just out to make a buck off of deer hunting, etc. Who gave you the right to choose who shall live and who shall die. Communism at its best. It is apparent that if it doesn't serve you, you seek to destroy it. Are you only concerned about your pocket book and deer season? It's been a rough year for everyone, including the wildlife. I believe they should be left alone. I believe there should be no licenses to kill these animals. You speak of "harvest" as if it's a good thing. It's never been a good thing.

**Which best describes your position regarding the 2021–22 furbearer recommendations?**

Strongly agree

**Do you have any additional comments about these recommendations?**

Many times females are killed leaving orphaned baby cougars. There is no proof whatsoever that shows cougar hunting is beneficial to our ecosystem. Sport hunting of cougars should end.

As a 40 year Utah resident, I continue to be ashamed that the Utah Division of Wildlife Resources still supports such a barbaric and unnecessary hunt. Even the terminology using words such as "game" and "harvest," objectify the cougar into a mere money making object, with the Utah Division of Wildlife Resources as the ring master of cougar killing, showing their true greed-based motivation. Money.

Form Name:  
Submission Time:

July/August 2021 RAC Feedback  
August 10, 2021 2:40 pm

Form Name:  
Submission Time:

July/August 2021 RAC Feedback  
August 10, 2021 2:44 pm

**Which best describes your position regarding the 2021–22 furbearer recommendations?** Strongly agree

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**Do you have any additional comments about these recommendations?** As always, Utah's approach to wildlife management: "Kill it!". Please stop favoring the hunters, and be more compassionate for the wildlife, and for those of us that like seeing the wildlife ALIVE.

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**Which best describes your position regarding the 2021–22 cougar recommendations?** Strongly agree

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**Do you have any additional comments about these recommendations?** As always, Utah's approach to wildlife management: "Kill it!". Please stop favoring the hunters, and be more compassionate for the wildlife, and for those of us that like seeing the wildlife ALIVE.

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Form Name:  
Submission Time:

July/August 2021 RAC Feedback  
August 10, 2021 2:45 pm

**Which best describes your position regarding the 2021–22 furbearer recommendations?** Strongly disagree

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**Which best describes your position regarding the 2021–22 cougar recommendations?** Strongly disagree

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Form Name:  
Submission Time:

July/August 2021 RAC Feedback  
August 10, 2021 3:14 pm

**Which best describes your position regarding the 2021–22 cougar recommendations?** Strongly disagree

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**Do you have any additional comments about these recommendations?** You are going to have way too many hooved animals by messing up the Cougar & Bobcat populations. Your recs seem very, very high!!! And unnecessary.

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Form Name:  
Submission Time:

July/August 2021 RAC Feedback  
August 10, 2021 4:13 pm

**Which best describes your position regarding the 2021–22 furbearer recommendations?** Strongly disagree

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**Which best describes your position regarding the 2021–22 cougar recommendations?** Strongly disagree

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Form Name:  
Submission Time:

July/August 2021 RAC Feedback  
August 10, 2021 4:20 pm

**Which best describes your position regarding the 2021–22 furbearer recommendations?** Strongly disagree

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**Do you have any additional comments about these recommendations?** I strongly disagree with the proposal to allow year round killing of cougars and bobcats just so deer and big horn sheep populations can be added to this killing field. It has been shown that trophy hunting DOES NOT boost big game populations!! Trophy hunting is incredibly cruel leaving wounded animals to suffer for days in traps .

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**Which best describes your position regarding the 2021–22 cougar recommendations?** Strongly disagree

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**Do you have any additional comments about these recommendations?** See above comments!!!

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Form Name:  
Submission Time:

July/August 2021 RAC Feedback  
August 10, 2021 4:45 pm

**Which best describes your position regarding the 2021–22 furbearer recommendations?**

Strongly disagree

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**Do you have any additional comments about these recommendations?**

I am a Resident..and a Big volunteer with PETA AND HUMANE SOCIETY...unless you Want us ..stampeding on your doorstep..STOP THIS INSANITY..WHY is humans solution to almost Everything...Oh..JUST KILL IT..YOU all give me a giant headache...And...Heartache

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Form Name:  
Submission Time:

July/August 2021 RAC Feedback  
August 10, 2021 5:25 pm

**Which best describes your position regarding the 2021–22 furbearer recommendations?** Strongly disagree

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**Do you have any additional comments about these recommendations?** Allowing trophy hunting of cougars to boost deer populations is not supported by research, is ineffective, and cruel. Stop cow tailing to hunters and let these already fragile populations be.

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**Which best describes your position regarding the 2021–22 cougar recommendations?** Strongly disagree

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Form Name:  
Submission Time:

July/August 2021 RAC Feedback  
August 10, 2021 9:22 pm

**Which best describes your position regarding the 2021–22 furbearer recommendations?** Strongly disagree

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**Which best describes your position regarding the 2021–22 cougar recommendations?** Strongly disagree

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Form Name:  
Submission Time:

July/August 2021 RAC Feedback  
August 10, 2021 9:49 pm

**Which best describes your position regarding the 2021–22 furbearer recommendations?** Strongly disagree

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**Do you have any additional comments about these recommendations?** These animals are doing well. Why would we not allow them to continue to thrive? There is no need to hunt and barbarically kill them.

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**Which best describes your position regarding the 2021–22 cougar recommendations?** Strongly disagree

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**Do you have any additional comments about these recommendations?** If big game populations are down, why not reduce the number of permits for those species instead of killing more predators?

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Form Name:  
Submission Time:

July/August 2021 RAC Feedback  
August 10, 2021 10:08 pm

**Which best describes your position regarding the 2021–22 furbearer recommendations?** Strongly disagree

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**Which best describes your position regarding the 2021–22 cougar recommendations?** Strongly disagree

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Form Name:  
Submission Time:

July/August 2021 RAC Feedback  
August 11, 2021 10:32 am

**Which best describes your position regarding the 2021–22 furbearer recommendations?** Strongly disagree

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**Which best describes your position regarding the 2021–22 cougar recommendations?** Strongly disagree

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Form Name:  
Submission Time:

July/August 2021 RAC Feedback  
August 11, 2021 5:21 pm

**Which best describes your position regarding the 2021–22 furbearer recommendations?** Strongly disagree

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**Which best describes your position regarding the 2021–22 cougar recommendations?** Strongly disagree

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Form Name:  
Submission Time:

July/August 2021 RAC Feedback  
August 11, 2021 9:40 pm

**Which best describes your position regarding the 2021–22 furbearer recommendations?** Strongly disagree

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**Which best describes your position regarding the 2021–22 cougar recommendations?** Strongly disagree

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Form Name:  
Submission Time:

July/August 2021 RAC Feedback  
August 12, 2021 10:47 am

**Which best describes your position regarding the 2021–22 furbearer recommendations?** Strongly disagree

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**Which best describes your position regarding the 2021–22 cougar recommendations?** Somewhat disagree

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Form Name:  
Submission Time:

July/August 2021 RAC Feedback  
August 16, 2021 6:15 pm

**Which best describes your position regarding the 2021–22 furbearer recommendations?** Strongly disagree

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**Which best describes your position regarding the 2021–22 cougar recommendations?** Strongly disagree

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Form Name:  
Submission Time:

July/August 2021 RAC Feedback  
August 18, 2021 3:43 pm

**Which best describes your position** Strongly disagree  
**regarding the 2021–22 furbearer**  
**recommendations?**

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**Do you have any additional comments about these recommendations?**

On behalf of the Humane Society of the United States and our supporters in Utah, I am writing to express our strong opposition to the Utah Division of Wildlife Resources' ("DWR") 2021-2022 furbearer recommendations ("Recommendations") that increase the number of bobcat permits to six permits per person, lift the permit cap, and extend the bobcat hunting season by an additional week. DWR's Recommendations will likely result in significant jeopardy to Utah's bobcats and are not supported by the majority of Utahns. Recent polling shows that the majority of Utahns (64%) do not support the recreational hunting and trapping of bobcats (1).

DWR's data show that hunters cause most bobcat mortalities in Utah, primarily through trapping, with hunters killing an average 1,772 bobcats annually from 2010 to 2020 (2). Moreover, DWR's data show a declining trend in bobcats killed by hunters and trappers (3). As such, and for the reasons that follow, we are concerned with DWR's recommendation to increase bobcat hunting permits and lengthening the season and recommend the Commission oppose the proposed changes.

If not persecuted, wild bobcats can live up to 15 years in the wild (4). Yet bobcats face a variety of threats - most from people, including from hunters, trappers, poachers, vehicle collisions (5), and predator-control agents (for perceived or real livestock losses) (6). Bobcats caught in live traps likely die painfully and cruelly by strangulation so that their pelts are not damaged.

While female bobcats are sexually mature at about one year of age, they do not breed until after they are two years old (7). Males can start to mate at two years of age-but most do not until they become territorial residents-after they are about three years old (8).

Bobcats can reproduce year-round but typically breed during winter and spring, with most young born during the spring and summer months (9). Females prefer secluded den sites to raise their litter of one to six kittens (the average is three kittens per litter), and will often move their kittens around between multiple den sites to prevent detection from other predators (10). Birth intervals vary, with some bobcats having one litter per year or even one litter every two years (11).

Hunting of bobcats orphans dependent kittens, leaving them to starve or vulnerable to predation or exposure. Bobcat kittens depend on their mothers for survival for eight to ten months (12). They are weaned at approximately two to three months of age, after which they follow their mothers on daily hunts to master the craft of survival. By wintertime, kittens make their own kills (13). When kittens are self-sufficient, typically between nine and twenty-four (9 to 24) months of age, these subadult transients disperse from their natal areas (the area where they were born) in an attempt to find their own home range and mates. Dispersal distances vary widely among young bobcats (14).

Because their habitats and corridors are in decline, bobcats should not have to face indiscriminate hunting and trapping regimes. Bobcats prefer undisturbed, connected natural habitats, which are vanishing in Utah. Their ability to adapt to many different natural habitats increases their survival. Bobcats have a wide habitat tolerance and can live in almost any natural habitat that provides cover, which they require in order to hunt. However, bobcats are sensitive to human activities (15), including human development and disturbance (16).

Bobcats avoid urban and exurban (that is, low density housing in formerly pristine areas) lands (17), agricultural lands (18) and deep snow (19). Alarmingly, exurban areas are gobbling up wildlife habitats and are many times greater in size than all suburban and urban areas combined (20). Studies show that adult females avoid urban areas and fragmented habitats (21).

Subadult bobcat transients need safe passages in order to find new habitats and establish home ranges. Yet bobcats are threatened by habitat fragmentation and can become locally extinct in habitats that are highly fragmented (22). A bobcat's home range is a fixed area that includes necessary resources for life, such as sufficient prey, water resources, and denning sites where mothers can rear their kittens (23). Male and female bobcats establish home ranges with considerable overlap. Male bobcats generally occupy larger home ranges than females - typically two to three times the size (24). The average range size for a female bobcat is from 1 km<sup>2</sup> to 86 km<sup>2</sup> while the average range for a male bobcat is from 2 km<sup>2</sup> to 325 km<sup>2</sup> (25). Bobcats' home range size is strongly correlated with their population density, which is dictated by prey availability (26).

Additionally, hunting and trapping are not necessary to keep bobcat populations in check, as they are self-regulating and limited by other factors, including the amount of available prey. Bobcats are opportunistic hunters and consume a wide variety of prey, but their main foods of choice include lagomorphs (snowshoe hares, cottontail rabbits and jackrabbits) and rodents (mice, voles, squirrels and beavers) (27). Bobcats are an "obligate" carnivore - meaning that they require an all-meat diet (28). Their range size contract during prey peak periods, especially when lagomorphs are abundant (29).

Because of the challenges that bobcats face for survival-fluctuations in prey, competition with other carnivores and predation from them, the addition of hunting and trapping is troublesome to their survival. Prey populations generally far exceed the biomass of their predators, and the number of prey generally determines the numbers of their predators (30). But in a groundbreaking 2015 study published in Science, biologists reviewed more than 1,000 studies and came to a different conclusion: Even as prey biomass increases, predator numbers do not necessarily follow. That is because predators mainly eat the young and old prey animals, and prey animals who live in crowded conditions breed more

slowly, leaving fewer animals for carnivores to eat (31). For example, on the Kalahari, Hatton et al. (2015) found 200kg of prey (buffalo, impala etc.) per square kilometer, but only 4kg of lions and hyenas in that same space (32).

Bobcats also compete for food resources with coyotes, gray foxes and even birds of prey such as great horned owls, and to a lesser extent, with mountain lions (33). Bobcats face competition with other carnivores for prey and may be killed themselves by coyotes, domestic dogs and mountain lions (34).

Researchers found that coyotes and gray foxes enjoyed omnivorous diets that included mammals, fruit and seeds, invertebrates, and birds (35). But bobcats were not detected in small urban fragments, because they, as obligate carnivores, required a more specialized diet. Because of bobcats' food specialization, they were excluded from small urban areas, unlike more opportunistic carnivores (36).

But in another study, researchers found that bobcats sometimes have the advantage over other mesocarnivores-even ones larger in body size (37). Both bobcats and skunks fared better than predicted because of their better weapons: hooked claws for the bobcats and chemical weapons for the skunks (38).

In a Colorado study, authors found that bobcats and mountain lions shared the same habitats, but in wildlands bobcats avoided areas where lions had been for a few days (39). In exurban areas, however, bobcats did not avoid mountain lions and were more likely to encounter them-risking deadly strife. Lewis et al. (2015) conclude that human development has a potential to alter felid communities with its associated changes in ecological communities (40).

Even without human-caused mortality, bobcats face additional threats from disease. Bobcats are susceptible to disease, including from domestic cats. If domestic cats do not receive regular veterinary care and are free-roaming, they become the source for numerous diseases to wildlife including rabies, feline leukemia virus and numerous parasites (41). Researchers have documented the transmission of diseases from domestic cats to wild felids. In urban areas, mountain lions and bobcats are susceptible to feline immunodeficiency virus (FIV) from domestic cats (42).

For the reasons stated above, the Humane Society of the United States opposes DWR's 2021-2022 furbearer recommendations that increase the number of bobcat permits to six permits per person, lift the permit cap, and extend the bobcat hunting season by an additional week. We ask the Utah Wildlife Board to similarly oppose these recommendations and protect bobcats from unnecessary and cruel hunting and trapping.

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**Which best describes your position  
regarding the 2021–22 cougar  
recommendations?**

Strongly disagree

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**Do you have any additional comments about these recommendations?**

On behalf of the Humane Society of the United States and our supporters in Utah, I am writing to express our strong opposition to the Utah Division of Wildlife Resources ("DWR") recommendations for the 2021-2022 cougar hunting season ("Recommendations"). DWR's Recommendations and Predator Management Plans ("PMPs") are not sustainable for Utah's rare and iconic cougar populations, as decades of research conducted in Utah and around the country shows. Furthermore, according to multiple surveys, including one conducted just this month, the majority of Utahns oppose the hunting of cougars (1).

DWR does not have a firm grasp on Utah's cougar population size, densities, and demographics because the agency relies heavily on anecdotal data, such as hunter surveys, which researchers note is largely inadequate to inform best management practices and sustainable quotas. Cougar population density is largely determined by the availability of prey (2) and territoriality (3), among other limiting factors. As such, recreational hunting is wholly unnecessary for keeping their populations in check. The levels of cougar hunting in Utah have been documented by cougar biologists as intemperate and unsustainable. In fact, were it not for immigration and a few refugia in Utah where hunting is not allowed, there would be no Utah cougars (4).

Beyond unnecessary recreational hunting, Utah's cougars face a multitude of other threats, including loss of habitat and climate change. Despite these concerns and uncertainties, hunters in Utah still kill hundreds of cougars every year. Now DWR plans to allow essentially year-round, unlimited hunting of cougars throughout most of the state through the implementation of 25 new PMPs, and an increased bag limit of two cougars per hunter, despite empirical scientific evidence of the extreme hardship this killing will have on cougar populations that are already overexploited.

It is axiomatic that administrative agencies only create rules and regulations that conform to their authorizing statute. See, e.g. *Lockheed Aircraft Corp. v. State Tax Comm'n*, 566 P.2d 1249, 1251 (Utah 1977). Here, the Utah Code directs DWR to "determine the facts relevant to the wildlife resources of this state" and, on the basis of those facts, mandates the Wildlife Board to "establish the policies best designed to accomplish the purposes" of "the preservation, protection, conservation, perpetuation, introduction, and management of wildlife." Utah Code § 24-14-3(2)(a). In carrying out this dictate, the legislature directed the Board to "seek to maintain wildlife on a sustainable basis." *Id.* § 24-14-3(2)(b).

And, like all Utah agencies, DWR may not establish rules that are "not supported by substantial evidence." *Id.* § 63G-3-602(4)(a)(ii). Furthermore, recently passed legislation (H.B. 125) directs DWR to reduce predation on big game species (e.g. mule deer and bighorn sheep) when a) the population is under the established herd size objective for a management unit and b) DWR determines that predators (e.g., cougars) are significantly contributing to the population not reaching their objective. Taken together,

the statutory scheme authorizing this rulemaking requires fact-driven, scientific management that seeks to sustainably maintain wildlife populations.

Yet none of the documents provided to the Commission or the public in support of the PMPs or the proposed Recommendations demonstrate, or provide substantial evidence, that predation is a significant limiting factor on big game herd size. Moreover, Utah's big game herd size objectives are extremely outdated and do not reflect sustainable herd sizes relative to Utah's human population growth, oil and gas mining, and other primary limiting factors such as drought and other weather events that are likely to increase as a result of climate change. Rather than allowing the essentially unlimited killing of cougars, DWR must protect native carnivores and re-evaluate Utah's big game herd size objectives, as they are likely no longer realistic given Utah's current and future landscape.

The extreme expansion of cougar hunting proposed by DWR's Recommendations and PMPs is antithetical to Utah's wildlife statutes. As proposed, this high level of hunting runs afoul of DWR's legislative mandate to manage for sustainability. The law requires that management of Utah's cougar population and recreational hunting of these native carnivores be informed by the best available science rather than political motivations (5). Because of this, and for the reasons that follow, the Wildlife Board must prohibit DWR from implementing PMPs and reject DWR's Recommendations to expand recreational hunting of cougars in Utah.

1) The Recommendations and PMPs authorize hunting levels upon cougars that exceed what experts consider a sustainable offtake rate, threatening their stability and long-term survival. While we do not support a recreational hunt on cougars, DWR must ensure that any permits and quotas not exceed scientifically valid, sustainable rates if the agency is determined to permit a hunt;

2) Research shows that killing cougars to protect big game species is typically ineffective and may expose larger numbers of herd animals to disease. Moreover, recreational hunting of cougars can result in increased predation on animals with smaller body mass, such as deer.

3) Heavy killing of cougars can increase conflicts with humans and livestock and is not a long-term solution for reducing conflicts. DWR's current cougar management strategy, which allows for alarmingly high levels of killing, may likely lead to increased livestock losses from cougars.

4) Killing cougars harms their family groups, including dependent kittens and their mothers. Research shows that cougars are far more social than previously believed and hunting them causes social chaos, which has human ramifications. It also hinders the ecological benefits they provide to a wide range of other wildlife species.

The following discussion bolsters the preceding justifications:

I. Hunting cougars does not boost prey populations for the long-term and may actually lead to increased predation on big game species in need of conservation.

The scientific consensus for the last several decades has generally concluded that carnivores modulate ungulate prey populations and make them more vigorous (6). This is because large carnivores remove the sick and weak animals that would die of other natural causes anyway, or reduce their own competitors, including smaller wild carnivores such as coyotes, that prey on young ungulates (7).

Trophy hunting and predator-control schemes are unpopular with the public (8), and are an unreliable and ineffective way to increase the abundance of ungulates (9). The best available science indicates that widespread elimination of cougars, bears and coyotes is unlikely to make ungulate herds grow exponentially (10). Numerous studies demonstrate that predator removal actions "generally had no effect" in the long term on ungulate populations (11). Because ecological systems are complex, heavily persecuting cougars will fail to address the underlying malnutrition problems that deer face. If Utah wants to grow its ungulate population, then DWR must foster survival of adult female mule deer to stem declines; and it must increase nutritional conditions for mule deer as these factors are the most important for mule deer survival (12).

Additionally, research shows that recreational hunting, or trophy hunting (13), of cougars typically results in the killing of the largest male cougars and can therefore lead to increased predation on big game species such as deer and bighorn sheep. In short, the older the cougar, the larger the prey they specialized upon. Older cougars, such as the large, territorial males typically sought after by hunters, tend to target larger prey, such as elk, while younger cougars tend to target smaller prey, such as mule deer. This research suggests that heavy killing of cougars, as is authorized in Utah, may exacerbate problems for big game populations such as mule deer and bighorn sheep by changing the age?structure of the cougar population to predominantly younger cats that are more likely to hunt deer over elk (14).

Utah's mule deer would benefit from further research on the effects of human development, including from oil and gas extraction and housing and road construction on mule deer habitat use and migration patterns. Residential and energy development has reduced all ungulates across the West, particularly on winter ranges (15). Research shows that a lack of high-quality winter range is limiting robust mule deer population growth in neighboring Colorado (16). Although the precise connections between energy development and population-level effects are still imperfectly understood, research has shown that oil and gas development affects mule deer habitat use and migration patterns by causing site avoidance, particularly in daytime (17), and creating "semi-permeable" barriers to

migration routes (18). DWR should be focusing its efforts on research to evaluate the effects of human development on prey populations and ways to mitigate those effects, rather than allowing increased hunting of cougars that will have little long-term benefit for increasing prey populations.

Persecuting cougars will not help bighorn sheep recruitment, either. It is clear from the literature that bighorn sheep populations are in decline in the U.S. because of unregulated market hunting, trophy hunting, disease from domestic sheep (19), resource competition by livestock, and loss of habitat (20). The Payette National Forest's Update to the Draft Supplemental Environmental Impact Statement (January 2010), provides an excellent literature review on sheep die offs attributed to domestic livestock and recommend that wild and domestic sheep and goats be separated (21).

Sawyer and Lindzey (2002) surveyed more than 60 peer-reviewed articles concerning predator-prey relationships involving bighorn sheep and cougars, concluding that while predator control is often politically expedient, it often does not address underlying environmental issues including habitat loss, loss of migration corridors, and inadequate nutrition (22). In total, the best available science suggests that persecuting cougar populations is not a solution toward enhancing bighorn sheep numbers. That is because cougar predation upon bighorn sheep is a learned behavior conducted by only a few individuals who may not repeat their behavior (23).

DWR can better plan for bighorn sheep management by selecting relocation sites for bighorn sheep that have little stalking cover (24). Escape terrain that contains cliffs, rocks, and foliage makes excellent ambush cover for a cougar (25) and should be avoided. The amount of cougar predation is also generally greater on small-sized bighorn sheep populations (those with fewer than 100 individuals) than on other larger bighorn sheep populations (26). A host of authors reviewed by McKinney et al. (2006) and Ruth and Murphy (2010) recommend only limited cougar removals to benefit bighorn sheep populations (27).

II. Cougars provide significant ecosystem benefits to their prey and other wildlife, as well as economic benefits to Utahns

Cougars help prevent deadly deer-vehicle strikes (28) that can result in numerous human mortalities and pose significant financial and ecological costs to society (29). In fact, by reducing vehicle collisions with deer, cougars saved drivers \$1.1 million in collision costs annually in South Dakota (30). Additionally, highways fragment wildlife habitats, which can lead to both genetic inbreeding problems and direct mortality from vehicle collisions (31). The cost of vehicle-animal collisions can be mitigated with the construction of highway structures that are designed to draw specific species such as mule deer across them, preventing not only vehicle strikes, but protecting species and people while saving millions of dollars annually (32).

Moreover, cougars help maintain the health and viability of ungulate populations by preying on sick individuals, reducing the spread of disease such as chronic wasting disease (CWD) and brucellosis. For example, during a study in Rocky Mountain National Park, researchers found cougars preyed on mule deer infected with CWD (33). The study concluded that adult deer preyed upon by cougars were more likely to have CWD than deer shot by hunters. According to the study, "The subtle behaviour changes in prion-infected deer may be better signals of vulnerability than body condition, and these cues may occur well before body condition noticeably declines,"(34). This suggests that cougars select for infected prey and may be more effective at culling animals with CWD than hunters who rely on more obvious signs of emaciation that occur in later stages of the disease. Moreover, the cougars consumed more than 85% of carcasses, thereby removing a significant amount of the disease from the environment (35).

This ecosystem benefit is increasingly important as CWD infection continues to grow in prevalence and distribution in Utah and neighboring states (36). Hammering our state's cougar population through high levels of trophy hunting and predator control undermines one of our best defenses against the spread of this deadly disease.

### III. Hunting cougars increases human and livestock conflicts with these native cats

Hunting and predator control of cougars results in increased conflicts because cougars' social structure are destabilized (37). A review of predator-removal studies found that the practice is "typically an ineffective and costly approach to conflicts between humans and predators" and, as a long-term strategy, will result in failure (38). Instead, the authors concluded, non-lethal alternatives to predator removal, coupled with coexistence (husbandry techniques) may resolve conflicts (39).

A Washington state study shows that as cougar complaints increased, wildlife officials lengthened seasons and increased quotas to respond to what they believed was a growing cougar population. However, the public's perception of an increasing population and greater number of livestock depredations was actually the result of a declining female and increasing male population (40). Heavy hunting of cougars skewed the ratio of young males in the population by causing compensatory immigration and emigration, even though it resulted in no net change in the population (41).

Study authors found that the sport hunting of cougars to reduce complaints and livestock depredations had the opposite effect. Killing cougars disrupts their social structure and increases both complaints and livestock depredations (42). 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%," (43).

Similarly, a study published just this year shows the very same result - lethal removal of cougars is associated with increased conflicts, especially on small hoofstock including sheep and goats (44). Dellinger et al. (2021) state: "Removals can thus create a negative-feedback loop that leads to increasing conflict and lethal removal, which could begin to negatively impact the mountain lion population via reduced gene flow and population viability (Hiller et al. 2015, Vickers et al. 2015, Benson et al. 2019). Thus, maintaining an older age structure by reducing lethal removal of resident adults could mitigate depredations (Logan 2019)."

Hunting disrupts cougars' sex-age structure and tilts a population to one that is composed of younger males, who are more likely to engage in livestock depredations than animals in stable, older populations (45). In 2019, the Humane Society of the United States published a report on livestock losses from cougars using the U.S. Department of Agriculture's data (46). For Utah's cattle ranchers, 2015 data show that most cattle losses came from maladies (illnesses, birthing problems, weather and theft) with far fewer losses coming from native carnivores and domestic dogs together (47). Of the 21,000 unwanted cattle losses in Utah that year, 88% were from maladies (18,440 cattle), with only 1.15% coming from cougars (241 cattle), according to the USDA (48).

IV. DWR must significantly reduce cougar hunting to maintain healthy populations in Utah

DWR's current and proposed hunting quotas, including unlimited hunting in many units, on Utah's cougar population are excessive and not in line with the best available science on cougar management. DWR's Cougar Plan, citing no studies, states: "Most cougar populations can sustain harvest rates of 20% to 30% of the adult population depending on the age and sex composition of the harvest," (49). Even so, DWR has authorized cougar hunting at levels that exceed this rate (50). DWR's PMPs and Recommendations will likely result in even more hunting of cougars, with increased bag limits and quotas, along with year-round, unlimited hunting in the majority of Utah. This management strategy places political priorities over sound science.

Furthermore, DWR continues to manage Utah's cougar population without a reliable population estimate. The agency still relies on an almost 20-year-old population estimate of 2,528 to 3,926 cougars of all ages to manage this iconic species (51). DWR must provide an updated, reliable cougar population estimate and manage the state's population sustainably, prioritizing the species' stability and persistence on the landscape. Until DWR can produce a reliable population estimate for Utah's cougars, the

agency must be extremely conservative in setting hunting quotas and permit numbers. Additionally, Beausoleil et al. (2013) suggest that wildlife managers use a density of 1.7 (2.0) cougars/100 km<sup>2</sup> if managers cannot afford to conduct a mark, recapture study (52).

If DWR is to continue allowing recreational hunting of cougars, the agency must set sustainable quotas based on reliable research and population estimates to prevent over-persecution. Several cougar studies conducted in Washington, Montana, and Idaho show that cougar populations can only sustain an offtake rate of no more than 14% per year (53). DWR's proposal to permit the killing of 40% or more of the Utah cougar population has no basis in sound science.

After conducting 17 years of research, Utah cougar biologists Wolfe et al. (2015) recommend that Utah manage cougars at a metapopulation level rather than at the single population level. They further add: "We recommend a conservative management approach be adopted to preclude potential over-harvest in future years," (54). Instead of heeding its own experts, the DWR continues to permit additive levels of mortality to its cougar population (55). Wolfe et al. (2015) explain that on one of their long-term study sites, the Monroe Mountains, along with surrounding locations, were population sinks (56).

DWR already allows dangerously high levels of killing that could harm the long-term survival of Utah's cougar population. Despite its aridity and relatively low levels of plant production (57), Utah's cougar mortality through recreational hunting is alarmingly high, exceeding 500 cougars killed during both the 2018 and 2019 hunting seasons, and steadily increasing each year (58). These native carnivores are not resilient in the face of heavy-handed hunting regimes (59). Therefore, DWR must substantially reduce hunting quotas if cougars are to persist in Utah.

V. DWR must reduce recreational hunting of cougars to sustainable levels to protect their social communities and entire ecosystems, including other wildlife

Recreational hunting is the greatest source of mortality for cougars throughout the majority of their range across the western and midwestern United States (60). The practice is often harmful to more than just the wild cats who are killed. Batavia et al. (2018) write: Compelling evidence shows that the animals hunted as trophies have sophisticated levels of "intelligence, emotion and sociality," which is "profoundly disrupted" by hunting (61). Unlimited and unsustainable hunting of cougars, such as that proposed in the PMPs and the Recommendations, is harmful to cougars and their social communities, as well as to the other wildlife that depend on these keystone species. For these reasons, DWR must reduce hunting of cougars to sustainable levels if the practice is to continue in Utah:

- 1.) Hunting of cougars must be limited to prevent excessive, unsustainable

mortality: Cougars 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 (62). Human persecution affects their social structure (63), and harms their persistence (64).

Research shows that recreational hunting results in additive mortality-hunters increase the total mortality to levels that far exceed what would occur in nature (65). In fact, the effect of human persecution is "super additive," meaning that hunting cougars has a multiplier effect on total mortality due to breeder loss, social disruption and its indirect effects including increased infanticide and decreased recruitment of their young (66). When hunters remove the stable adult cougars from a population, it encourages subadult males to immigrate, leading to greater aggression between cats and mortalities to adult females and subsequent infanticide (67).

2.) The Recommendations and PMPs are harmful to cougar communities: A study on cougars in Wyoming shows that cougars are quite social and live in "communities," with females sharing kills with other females, their kittens and even with the territorial males. In return for these meals, the adult males protect the females and their kittens from incoming, competing males (68). Disrupting these communities leads to deadly intraspecific strife, including infanticide on the kittens, and social chaos within the family groups (69). Hunting destabilizes cougar populations, which may cause increased conflicts with humans, pets and livestock (70).

3.) The Recommendations and PMPs are unnecessary, as cougars are a self-regulating species: Cougars occur at low densities relative to their primary prey, making them sensitive to bottom-up (prey declines) and top-down (human persecution) influences (71). Their populations must stay at a smaller size relative to their prey's biomass or risk starvation (72). They do this by regulating their own numbers (73). When prey populations decline, so do cougar populations (74). Cougars also require expansive habitat, with individual cats maintaining large territories that overlap with one another (75).

4.) The Recommendations and PMPs are particularly harmful to kittens and their mothers: In heavily hunted populations, female cougars experience higher levels of intraspecific aggression (fights with other cats) resulting in predation on themselves and their kittens (76). Over-hunting harms a population's ability to recruit new members if too many adult females are removed (77). A Utah study shows that hunting adult females orphans their kittens, leaving them to die by dehydration, malnutrition, and/or exposure (78). Kittens are reliant upon their mothers beyond 12 months of age (79).

5.) The Recommendations and PMPs may halt cougars' ability to create trophic cascades in their ecosystems, which benefits a wide range of flora, fauna and people: Cougars serve important ecological roles, including

providing a variety of ecosystem services (80). As such, conserving these large cats on the landscape creates a socio-ecological benefit that far offsets any societal costs (81). Their protection and conservation has ripple effects throughout their natural communities. Researchers have found that by modulating deer populations, cougars prevented overgrazing near fragile riparian systems, resulting in greater biodiversity (82). Additionally, carrion left from cougar kills feeds scavengers, beetles, foxes, bears and other wildlife species, further enhancing biodiversity (83).

6.) The Recommendations and PMPs could increase hound hunting, which is harmful to both the cougar and the hounds, as well as other wildlife: Using radio-collared trailing hounds to chase cougars and bay them into trees or rock ledges so a hunter can shoot these cats at close range is unsporting, unethical and inhumane (84). Hounds kill kittens, and cougars often injure or kill hounds (85). The practice is exceedingly stressful and energetically taxing to cougars (86). Additionally, hounds chase and stress non-target wildlife, such as deer and porcupines (87), and may trespass onto private lands (88).

VI. The Recommendations and PMPs are not economically sound or supported by most Americans who want to see wildlife protected

DWR's cougar hunting Recommendations and PMPs are not in the best interest of Utahans, who value these animals and do not support the heavy killing currently proposed. Polling conducted just this month by Remington Research Group shows that the Utahns oppose the hunting of cougars (89). Even Utah's hunters are split, with 46% supporting the practice and 45% opposing it. Furthermore, more livestock operators are opposed to the hunting of cougars than support the practice (47% compared to 36%). The poll also found that rather than needlessly killing cougars for trophies and bragging rights, Utahns would rather have more investments in educating residents and tourists on how to coexist with this charismatic species.

Previous polling further demonstrates that the majority of Utahns do not support the trophy hunting of cougars (90). The public values cougars and views them as an indicator of healthy environments while posing little risk to people living near them (91). A new study indicates that Americans highly value wildlife, including top carnivores such as cougars, and are concerned about their welfare and conservation (92).

Killing cougars deprives citizens of their ability to view wild cougars (93). Nonconsumptive users are a rapidly growing stakeholder group who provide immense economic contributions to the communities in which they visit (94). The U.S. Fish and Wildlife Service's wildlife-recreation reports show that wildlife watchers nationwide have increased 20% from 2011, numbering 86 million and spending \$75.9 billion, while all hunters declined by 16%, with the biggest decline in big game hunters, from 11.6 million in 2011 to 9.2 million in 2016 (95). Hunters spent \$25.6 billion in 2016, or one-third that spent by wildlife watchers (96).

## VII. Conclusion

DWR's cougar hunting Recommendations and PMPs will not maintain sustainable cougar populations in Utah and are harmful to other wildlife, including mule deer and bighorn sheep the agency seeks to protect. They are also harmful to livestock operators, including Utah's sheep ranchers, as research shows that killing cougars can increase conflicts, including predation on small hoofstock. Therefore, we ask the Wildlife Board not to adopt the Recommendations and to prohibit the implementation of the PMPs. If recreational hunting of cougars is to continue in Utah, DWR must reduce hunting permits and quotas to better reflect sustainable cougar management. DWR should do this by placing an 11 to 14% cap on recreational hunt mortality, based on an updated, scientifically sound population estimate.

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literature supports the relationship between disease in bighorn sheep populations and contact with domestic sheep, including both circumstantial evidence linking bighorn die-offs in the wild to contact with domestic animals and controlled experiments where healthy bighorn sheep exposed to domestic sheep displayed subsequently high mortality rates (Foreyt 1989, 1990, 1992; Foreyt et al. 1994; Onderka et al. 1988; Onderka and Wishart 1988; Garde et al. 2005).

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(61) 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)." Authors then argue that trophy hunting cannot be "presumed [to be] integral to conservation success." (62) e.g., A. D. Wallach et al., "What Is an Apex Predator?," *Oikos* 124, no. 11 (2015); Wielgus et al., "Effects of Male Trophy Hunting on Female Carnivore Population Growth and Persistence."; Stoner, Wolfe, and Choate, "Cougar Exploitation Levels in Utah: Implications for Demographic Structure, Population Recovery, and Metapopulation Dynamics."; 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).

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**Which best describes your position regarding the 2021–22 cougar recommendations?**

Somewhat disagree

**Do you have any additional comments about these recommendations?**

I have a problem with the whole Predator Management thing. Units, (33 of them), were put into Predator Management with the stroke of a pen, bypassing the RAC and Board process. But, how will they ever come out of Predator Management? I hope The Wildlife Board will make this a part of the discussion In your meeting. I know it has been said that the Predator Management units have been taken out of The Board's jurisdiction, but, if you don't consider it, there will be no critical evaluation of it what so ever.

Form Name:  
Submission Time:

July/August 2021 RAC Feedback  
August 19, 2021 4:28 pm

**Which best describes your position**      Strongly disagree  
**regarding the 2021–22 cougar**  
**recommendations?**

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**Do you have any additional comments about these recommendations?**

Dear Chair Albrecht and members of the Utah Wildlife Board,

We write to you on behalf of the Mountain Lion Foundation's Utah members with concerns about the 2021-22 Cougar Permit Recommendations, as presented by the Utah Division of Wildlife Resources (DWR).

With 33 of the 53 cougar hunting units under aggressive Predator Management Plans (PMPs), which allow for unlimited year-round harvest and have a goal of >40% female harvest, Utah's cougars are at greater risk than ever before. For the remaining 20 cougar hunt units, the DWR has proposed harvest objectives that total 297 cougars for 19 of the cougar hunting units, and to place a 34th unit under a PMP. This means that the DWR has an objective of 297 cougars plus an additional unlimited number of cougars to be killed in more than half of the total cougar hunting units. The recommendations also allow for a single hunter to kill up to 2 cougars per year. This is not sustainable and does not fall in line with the DWR's Strategic Plan and stated mission to "serve the people of Utah as trustee and guardian of the state's protected wildlife."

The DWR has also proposed to change the time frame for setting cougar hunt objectives from annually at the August Wildlife Board to every 3 years at the December Board meeting. What's worse, the DWR is proposing to set hunt objectives for the 2021-22 cougar hunting season at the August 26, 2021 meeting and then set hunt objectives for the 2022-23 season this December and not to make changes again for 3 years, until the 2025-2026 season. That means that, although the DWR plans to give a status update every year, cougar hunt objectives would be set for the next 4 years by the end of this year. This is not good management.

The implementation of PMPs comes from legislation that was approved in 2020. These PMPs haven't even been in place for an entire year yet, which means negative effects of unlimited harvest to Utah's cougar population may not be realized yet. Despite this, the DWR is proposing to set quotas for the next 4 years. This is not sustainable, this is not good management, and this does not support the DWR's mission of serving the people of Utah as "trustee and guardian of the state's protected wildlife."

We urge the Commission to hold the DWR accountable as trustee and guardian of the state's protected wildlife, including cougars, and remove all hunting outside of the cougar hunting units that are under PMPs.

Hunting cougars has long been thought to bolster populations of game species like mule deer, while reducing competition for this shared resource. However, recent studies evaluated the impacts that heavy hunting of cougars has on mule deer and elk and found that hunting cougars does not increase deer populations. One study found that heavy hunting pressure on cougars had the opposite effect on mule deer. As trophy hunters often target the large, dominant male, they inadvertently reduce the age structure of cougars in the area, leaving younger, less experienced cougars on the

landscape. According to the study, these younger cougars 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 may actually be increasing the number of cougars that target deer.<sup>4</sup> In many cases, the hunting activity of cougars is actually beneficial to prey populations. Cougars often prey on sick or weak animals, and by doing so, remove diseased animals and weaker genes from the breeding population.

Cougars are getting the blame for mule deer and bighorn sheep declines, yet both mule deer and bighorn sheep are still hunted in the state. There are many other factors that influence deer and sheep survival, including drought and lack of quality forage. Additionally, studies have even shown that cougar hunting can contribute to the likelihood of cougars preying on declining prey, such as bighorn sheep, through the disruption of cougar social structures. , As resident males are hunted, younger males trying to claim a newly vacant territory harass resident females and try to kill her young to bring her into estrous. As a result, females with dependent young move to higher elevations, away from these younger males, where bighorn sheep, or mule deer, numbers may already be low from human hunting pressure, drought, and lack of quality forage. In these studies, when hunting was removed, females moved back to lower elevations and switched back to abundant deer, their preferred prey.

The guidelines of these PMPs, allowing for unlimited, year-round harvest and a target of >40% female harvest, may just make this problem much worse, as cougars can now be hunted without limit in much of the state. Instead of increasing cougar hunting, it should be reduced, if not removed, until the effects of the PMPs can be analyzed. Cougars, mule deer and bighorn sheep co-evolved together and, in the absence of human interference, would continue to persist at sustainable levels, together.

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.

We urge the Commission not to approve the Cougar Permit Recommendations as presented and instead to remove all cougar hunting from the 20 cougar hunting units not currently under a PMP. This would allow the DWR to do a comparative study of the effects that unlimited hunting has on mule deer, bighorn sheep and human-wildlife conflict in those units under PMPs and compare that to the remaining units where no hunting is permitted.

We ask the commission to remove all cougar hunting in cougar hunting units not under PMPs, at least until the effects of the PMPs can be realized.

We urge the commission to protect collared cougars that are being monitored for research. Every time a cougar that is part of a study is killed by a hunter, that dataset ends and disrupts the study. Cougar movement patterns can be very helpful for studying effects of cougars on bighorn sheep and mule deer, as well as studying movements of cougars in response to increased hunting pressure in the cougar hunting units under PMPs. As guardians and trustees of Utah's wildlife, the DWR should prioritize data collection and new scientific discovery, as it relates to cougars.

We ask the commission not to allow the killing of cougars that are GPS/radio-collared.

Thank you for the opportunity to comment on these items. Please include this letter as part of the official record regarding this decision.

Sincerely,

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**Which best describes your position regarding the 2021–22 furbearer recommendations?**

Somewhat disagree

**Do you have any additional comments about these recommendations?**

I am entirely opposed to the killing of any wildlife in the State of Utah. It is absolutely reprehensible. According to the memorandum dated 7/7/2021 with the subject line "Furbearer Recommendations", the gist of the memo is that Bobcat numbers are improving, so let's kill / slaughter / murder even MORE of these majestic, beautiful cats. How nice. As if that is not enough, you have a list of additional animals you will allow these inhuman hunters to go out and kill: marten, badger, gray fox, kit fox, ringtail, spotted skunk, and weasel. It's a wonder there are any left to kill at all??? The animal world reduces its own population naturally according to the circle of life. It is only man, with his evil and murderous nature, whose desire is to slaughter every single living wild animal on the planet, that has thrown things out of whack --- if that is even true. I oppose this senseless killing in the name of "wildlife management" which is a farce and a lie. You need to let these beautiful creatures --- ALL OF THEM, live out their natural lives in peace until they die naturally or at the hands of another wild animal doing what wild animals do in the wild. Leave them alone!!! Stop permitting the slaughter of these beautiful animals!! You are not fooling anyone with these so-called Wildlife Management Plans --- they are nothing but an excuse to kill kill kill these innocent beautiful animals for whatever reason is convenient to mankind. It's sickening beyond belief. How can you even live with yourselves day after day as state officials and legislators, knowing that you are responsible for implementing these reprehensible slaughters???

**Which best describes your position regarding the 2021–22 cougar recommendations?**

Strongly disagree

**Do you have any additional comments about these recommendations?**

The goal of lower predation rates is a misnomer and very misleading to the Utah public. Animals, through their natural-born hunting practices keep their own numbers in check. It is only man's interference that has disturbed this. And I doubt that this is even true, that the animal numbers are "off balance" as you claim. I frankly think it's just an excuse to slaughter them. You well know this. Reading through this document called the 2021-22 Cougar Permit Recommendations literally sickens me. The goal itself is perverted. The use of the word "harvest" when applied to a living, breathing, sentient animal is cruel, inhuman, and perverse. The price these cougar, bears, and other animals pay is horrendous. I cannot believe that you permit the hunting and killing of BEARS, let alone cougars, and all the other beautiful wildlife in Utah. It's absolutely disgusting and you should be ashamed of yourselves.