

From: Kelly Peterson kpeterson@humanesociety.org 
Subject: Cougar Management Plan Board Resolution: Comments for Immediate Attention

Date: June 22, 2020 at 8:03 AM

To: kvalness@oda.state.or.us

Cc: Haley Stewart hstewart@humanesociety.org, Brian Posewitz brian@humanevotersoregon.org, Kelly Peterson kpeterson@humanesociety.org, Jennifer Hauge jhauge@aldf.org, Michelle Blake mblake@mountainlion.org, wally sykes wally_sykes2000@yahoo.com, Brooks Fahy brooks@predatordefense.org, sbruegger@wildearthguardians.org, penny@cougarfund.org, nwarren1@earthlink.net

KP

Dear Chair Myers and Members of the Agriculture Board:

On behalf of the Humane Society of the United States and multiple national and state-based conservation organizations, we submit the following comments regarding the proposed Cougar Management Plan Resolution before the Oregon Board of Agriculture (Board).

We call on the Board to withdraw this resolution in light of the best available research which shows that indiscriminate hunting and predator control of cougars as perpetuated by the Oregon Department of Fish and Wildlife Cougar Management Plan, can result in increased livestock depredations, at the expense of livestock, wildlife and ranchers.

If the Board wishes to renew this resolution, we ask that it be updated to support the implementation of more effective, proactive measures to prevent livestock depredations within the Cougar Management Plan. We have attached recommended language for such an update.

Please see our detailed comments attached.

Thank you for your consideration. I look forward to hearing back from you.

Respectfully,
Kelly

Kelly Peterson

Oregon Senior State Director

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Oregon State Board of Agriculture Resolution

Title: Cougar Management Plan	Number: 275 Effective Date: 02/17/2017
Sub-Committee: Government Relations ODA Staff Contact: Kathryn Walker	Next Review Date: 00/00/2020 Date of Last Review/Revision: 02/17/2017 Original Resolution Date: 03/02/2006
Board Chair: Barbara Boyer	Signature on file

Background

Resolution

~~Whereas, the Oregon State Board of Agriculture recognizes the threat an overpopulation of cougars are a species of Oregon wildlife that is valued and appreciated by many poses to the livestock industry in Oregonians:-~~

~~Whereas, cougars may sometimes pose a risk of harm to farm animals in Oregon; and~~

~~Whereas, the best available current science indicates that indiscriminate killing of cougars is not effective to reduce risk of harm by cougars to farm animals and may increase the risk of harm.~~

~~Be it resolved that the Board of Agriculture supports the use of non-lethal measures to reduce the risk of harm to farm animals by cougars or, if non-lethal measures have been exhausted but not been successful, through killing only of specific cougars known to be harming farm animals; and~~

~~Be it resolved further that the Board of Agriculture does not support attempts to manage Oregon's cougar population generally through indiscriminate killing of cougars the Cougar Management Plan as proposed by the Oregon Department of Fish and Wildlife.~~

Summary

~~Supports a non-lethal measures to manage cougar management conflicts with farm animals; opposes attempts to manage cougar populations through indiscriminate killing of cougars plan proposed by the Oregon Department of Fish and Wildlife; recognizes that an overpopulation of cougars poses a threat to the livestock industry in Oregon.~~



June 22, 2020

Marty Myers, Chair
Oregon Board of Agriculture
635 Capitol St NE
Salem, OR 97301

Submitted via email: kvalness@oda.state.or.us

RE: Cougar Management Plan Board Resolution

Dear Chair Myers and Members of the Board:

On behalf of the undersigned organizations and our supporters in Oregon, we submit the following comments regarding the Oregon Board of Agriculture (“Board”) Cougar Management Plan Resolution. We call on the Board to withdraw this resolution in light of the best available research which shows that indiscriminate hunting and predator control of cougars (*Puma concolor*), as perpetuated by the Oregon Department of Fish and Wildlife (“ODFW”) Cougar Management Plan, can result in increased livestock depredations, at the expense of livestock, wildlife and ranchers. If the Board wishes to renew this resolution, we ask that it be updated to support the implementation of more effective, proactive measures to prevent livestock depredations within the Cougar Management Plan. We have attached recommended language for such an update.

The current resolution states simply that the Board supports ODFW’s Cougar Management Plan and “recognizes that an overpopulation of cougars poses a threat to the livestock industry in Oregon.” Yet, this resolution is misguided as it 1) fails to recognize the science which shows that indiscriminate killing of cougars is unnecessary to maintain stable population numbers, and 2) assumes that the management strategies outlined in the Cougar Management Plan will be beneficial to Oregon’s livestock operators. This plan relies on recreational hunting and heavy-handed predator control tactics to lethally and indiscriminately remove hundreds of cougars from Oregon’s landscape every year.

For the reasons that follow, we urge you to withdraw this resolution or, alternatively, update it to reflect the very real need for effective solutions that the current Cougar Management Plan sorely lacks.

Hunting of cougars increases complaints and livestock depredations: Recreational hunting of cougars and the use of target area removals, both of which are indiscriminate, are not effective tools to prevent livestock depredations as numerous studies in the U.S. have shown.ⁱ In other words, these practices simply kill cougars randomly but do not actually target the individuals who are involved in livestock depredations. In fact, if hunters do select for specific cougars, it is for the large, territorial males, the removal of which can have harmful effects on human communities. Moreover, ODFW already allows any cougar that poses an immediate threat or is found in an urban area or farmstead to be killed. Therefore, a hunting season is entirely unnecessary to reduce potential threats to humans and livestock and may, in fact, exacerbate conflicts.

Heavy hunting of cougars can result in increased conflicts as the practice is disruptive to the sensitive social structure that ensures stability in their population.ⁱⁱ The largest sources of unwanted mortality in Oregon's livestock, such as weather, illness and birthing problems, cause significantly more losses (~88% of unwanted cattle losses; ~59% of unwanted sheep losses) compared to losses from cougar (~1% of unwanted cattle losses; 2.6% of unwanted sheep losses).ⁱⁱⁱ

While we recognize that livestock loss is a serious concern, we believe widespread lethal removal of cougars is not an effective or meaningful approach to preventing conflicts. Rather, this approach likely only results in more livestock depredations. Killing off established, territorial cougars will only create more conflicts for human communities and livestock operators. Killing these cougars opens up their territory and invites young cats to come in. These young cougars are less experienced at hunting natural prey and more likely to be involved in conflicts.

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

Study authors found that the 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.^{vi} Peebles et al. (2013, p. 6) 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%.^{vii}

Hunting disrupts cougars' sex-age structure and tilts a population to one that is comprised of younger males, who are more likely to engage in livestock depredations than animals in stable, older population.^{viii}

Furthermore, few Oregon livestock owners use non-lethal methods to protect their cattle and sheep.^{ix} Across the western U.S., ranchers and livestock operators are making significant strides with non-lethal methods, including tools and changes to husbandry practices, that prevent the loss of livestock from native carnivores. These tools are effective, inexpensive, and avoid losses from occurring in the first place, rather than dealing with conflicts after livestock have already been killed.

The Cougar Management Plan allows excessive hunting and predator control of cougars that exceeds sustainable levels and disrupts their social structures: ODFW's Cougar Management Plan allows cougars to be hunted for sport year-round; to be killed in response to complaints; and to be killed in large numbers by ODFW and its "agents" (regardless of whether the cougars killed were causing problems to people, pets or farm animals) in any "zone" where the three-year average of cougars killed in response to complaints exceeds the 10-year average. The Resolution would endorse this plan as necessary to prevent "an overpopulation of cougars [that] poses [a threat] to the livestock industry in Oregon."

Yet, we know from the best available science that the tactics ODFW relies on to manage cougars are unnecessary and, indeed, counterproductive for ensuring stable cougar populations. Cougars occur at low densities relative to their primary prey, making them sensitive to bottom-up (prey declines) and top-down (human persecution) influences.^x In order to survive, their populations must stay at a smaller size relative to their prey's biomass or risk starvation.^{xi} They do this by regulating their own numbers.^{xii} When prey populations decline, so do cougar populations.^{xiii} Cougar populations also require expansive habitat, with individual cats maintaining large home ranges, or territories, that overlap with one another.^{xiv} Because of their dependence on prey numbers and territorial nature, recreational hunting is not necessary to limit cougar densities to sustainable levels.

While ODFW relies on a statewide cougar population estimate of more than 6,400 cats, this estimate is not only widely disputed and likely inaccurate, it also presents a false picture of the state of cougars in Oregon by including a rough guesstimate of the number of cougar kittens on the landscape. Cougar kittens have high mortality rates, frequently dying before they've even left their mother's care, and are not legally hunted. Therefore, they should not be considered when setting management goals, strategies or hunting quotas. Instead, ODFW believes Oregon is home to around 3,500 adult and subadult cougars, or those that are old enough to be legally hunted.

As stated above, research shows that high rates of killing are correlated with increased conflicts. Disrupting these communities can cause negative effects and increase conflicts by causing social chaos within their populations.^{xv} Hunting can easily destabilize cougar populations, causing increased conflicts with humans, pets and livestock.^{xvi} Based on the adult and subadult cougar population estimate, ODFW's annual hunting quota of 970 cougars amounts to nearly 28% of the population, or double what experts believe is sustainable.^{xvii} And while such a high level of mortality is typically not reached in most of Oregon's cougar hunting zones, it has been in Zone A. Approximately 30% of cougars were killed in Zone A during the 2018 hunting season, primarily from recreational hunting, the highest level for any region. This high level of hunting

has been a common trend in Zone A over recent years. Notably, Zone A is the only region of the state that has experienced an increase in conflicts with cougars, as the research predicts.

For these reasons, we urge the Board to withdraw the Resolution. If you intend to renew the Resolution, we urge you to update it with a call to action for ODFW to include a more meaningful approach for effectively and proactively preventing cougar conflicts with livestock rather than relying on scientifically unsound and inhumane tactics of recreational hunting and indiscriminate predator control. We have attached recommended language for such an update and welcome the opportunity to discuss this language and other options with this Board. Thank you for your consideration.

Sincerely,

Kelly Peterson
Oregon Senior State Director
The Humane Society of the United States

Nancy Warren
Executive Director
National Wolfwatcher Coalition

Brian Posewitz
Director
Humane Voters Oregon

Wally Sykes
Northeast Oregon Ecosystem

Penny Maldonado
Executive Director
The Cougar Fund

Brooks Fahy
Executive Director
Predator Defense

Debra Chase
CEO
Mountain Lion Foundation

Samantha Bruegger
Wildlife Coexistence Campaigner
WildEarth Guardians

Jennifer Hauge
Legislative Affairs Manager
Animal Legal Defense Fund

ⁱ R. J. Lennox et al., "Evaluating the Efficacy of Predator Removal in a Conflict-Prone World," *Biological Conservation* 224 (2018).

ⁱⁱ Kaylie A. Peebles et al., "Effects of Remedial Sport Hunting on Cougar Complaints and Livestock Depredations," *Plos One* 8, no. 11 (2013); Kristine J. Teichman, Bogdan Cristescu, and Chris T. Darimont, "Hunting as a Management Tool? Cougar-Human Conflict Is Positively Related to Trophy Hunting," *BMC Ecology* 16, no. 1 (2016); L. Mark Elbroch and Howard Quigley, "Social Interactions in a Solitary Carnivore," *Current Zoology* 63, no. 4 (2017).

ⁱⁱⁱ The Humane Society of the United States, "Government Data Confirm That Cougars Have a Negligible Effect on U.S. Cattle & Sheep Industries," (2019). See Figs. 5a/b.

^{iv} Peebles et al., "Effects of Remedial Sport Hunting on Cougar Complaints and Livestock Depredations.," citing Lambert et al. 2006 and Robinson et al. 2008

^v Teichman, Cristescu, and Darimont, "Hunting as a Management Tool? Cougar-Human Conflict Is Positively Related to Trophy Hunting."

^{vi} Peebles et al., "Effects of Remedial Sport Hunting on Cougar Complaints and Livestock Depredations."

^{vii} Ibid

^{viii} Ibid

^{ix} The Humane Society of the United States, "Government Data Confirm That Cougars Have a Negligible Effect on U.S. Cattle & Sheep Industries," (2019). See Figs 38 and 39.

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- ^x D. Stoner, M. , M.L. Wolfe, and D. Choate, "Cougar Exploitation Levels in Utah: Implications for Demographic Structure, Population Recovery, and Metapopulation Dynamics," *Journal of Wildlife Management* 70 (2006).
- ^{xi} I. A. Hatton et al., "The Predator-Prey Power Law: Biomass Scaling across Terrestrial and Aquatic Biomes," *Science* 349, no. 6252 (2015).
- ^{xii} A. D. Wallach et al., "What Is an Apex Predator?," *Oikos* 124, no. 11 (2015).
- ^{xiii} Stoner, Wolfe, and Choate, "Cougar Exploitation Levels in Utah: Implications for Demographic Structure, Population Recovery, and Metapopulation Dynamics."
- ^{xiv} K. Hansen, *Cougar: The American Lion* (Flagstaff, AZ: Northland Publishing, 1992); A. Kitchener, *The Natural History of the Wild Cats* (Ithaca, New York: Cornell University Press, 1991).
- ^{xv} H. S. Robinson and R. Desimone, "The Garnet Range Mountain Lion Study: Characteristics of a Hunted Population in West-Central Montana: Final Report," *Montana Fish, Wildlife & Parks* (2011); H. S. Robinson et al., "A Test of the Compensatory Mortality Hypothesis in Mountain Lions: A Management Experiment in West-Central Montana," *Journal of Wildlife Management* 78, no. 5 (2014); H. S. Cooley et al., "Does Hunting Regulate Cougar Populations? A Test of the Compensatory Mortality Hypothesis," *Ecology* 90, no. 10 (2009); R. B. Wielgus et al., "Effects of Male Trophy Hunting on Female Carnivore Population Growth and Persistence," *Biological Conservation* 167 (2013); C. M. S. Lambert et al., "Cougar Population Dynamics and Viability in the Pacific Northwest," *Journal of Wildlife Management* 70 (2006); S. Creel et al., "Questionable Policy for Large Carnivore Hunting," *Science* 350, no. 6267 (2015); D. E. Ausband et al., "Recruitment in a Social Carnivore before and after Harvest," *Animal Conservation* 18, no. 5 (2015); Chris T. Darimont et al., "The Unique Ecology of Human Predators," *Science* 349, no. 6250 (2015).
- ^{xvi} Peebles et al., "Effects of Remedial Sport Hunting on Cougar Complaints and Livestock Depredations."
- ^{xvii} R. A. Beausoleil et al., "Research to Regulation: Cougar Social Behavior as a Guide for Management," *Wildlife Society Bulletin* 37, no. 3 (2013).

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Board Chair: Barbara Boyer	Signature on file

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Summary

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