

May 27, 2024

**Attention:** Montana Fish & Wildlife Commissioners

Thank for the opportunity to offer public comments regarding mountain lion quotas and extended seasons, and the Grizzly Bear Tri-State Memorandum of Agreement (MOA).

I note the “coincidence” of public comments due over Memorial Holiday weekend when many people are outdoors away from their computers. Please extend the comment period to June 30, 2024.

### **Mountain Lion Quotas, Extended Seasons**

It is apparent that these quotas are excessive and should be reduced substantially. The proposal continues extremely high mountain lion killing quotas of 235/year in 2023. The commission offers no science-based, valid justification for raising quotas in Region 2 of 280 lion kills. The only beneficiaries of these mountain lion quota increases and extended season are special interests that include profiteering outfitters, “guides” from out of state, and wealthy trophy hunters from all over the world. These special interests are deliberate mismanagement promoted by the currently appointed Fish and Wildlife Commissioners, not based on sound wildlife management.

The seven-month season for hound hunting mountain lions in LMU 150 and the Scapegoat Wilderness of LMU 280 is inhumane and unsustainable. Many violations to the Wilderness Act of 1964 (PL 88-577) will likely occur due to inadequate game warden coverage and remoteness of that landscape. It will conflict with elk hunting in the southern end of the Bob Marshall Wilderness and during the winter months illegal snowmobile trespass will likely occur.

Currently there are no wildlife biologists serving on the Montana Fish & Wildlife Commission. This suggests further evidence that many decisions made by the FWP Commission are not based on the best available science or ecological knowledge of field-based wildlife biologists. Wildlife watchers far outnumber lion hunters and want to see mountain lions alive in the wild.

Lion hunters using hounds do not have complete control over their dogs and are a threat to both companion and bird hunting dogs. This is not fair chase. This is a takeover of public lands by hound hunters, who represent a small number of people, in contrast to the majority of public land owners like me.

Predators, including mountains lions, contribute to healthy ecosystems and biodiversity. For example, Chronic Wasting Disease (CWD) is on the increase and apex predators can play a significant role in reducing the spread of CWD.

It is not true that we have a lack of elk across Montana, particularly in LMUs 240.250, and 270.

You provide no valid research on mountain lions killing off large number of ungulates. There are more white tail deer hit on Highway 83 than taken during hunting season. There are more elk in the Swan Valley now than when I arrived here 46 years ago. How can you justify these extreme lion quotas and extended seasons? For whom?

### **Grizzly Bear Tri-State Memorandum of Agreement (MOA)**

I am vehemently opposed to Tri-state Agreement of Grizzly bears. Montana, Idaho, and Wyoming have shown what a dismal failure the transfer of wolf management from the USFWS to the state fish and departments has been based on “wolf whacking” and other inhumane killings by people like Cody Roberts, Daniel, Wyoming. Eighty-five percent of Wyoming is open to killing wolves year-round by any means including BLM and Forest Service federally-managed lands that belong to ALL Americans, not just trophy hunters and wolf haters. Wolves are being purposely and systematically reduced to unsustainable numbers leading to extinction. Currently the USFWS is reviewing a proposal to relist northern grey wolves in MT, Idaho, and Wyoming for reasons stated above. You have lost the public trust in managing our wildlife. I remain unconvinced that state management of Grizzly bears will be in the best interest of a healthy, sustainable grizzly population.

Recently mountain goats that were translocated to the North Cascades had a nearly complete mortality. Where is your science-based evidence to justify that the same thing won't happen to Grizzly bears if they are trucked to the Greater Yellowstone Ecosystem (GYE)? Like mountain lion hunting, the only beneficiaries to increasing Grizzly bears in the Greater Yellowstone Ecosystem is to turn it into a grizzly game farm that grows Grizzly bears for trophy hunts. This is unacceptable and ignores the tenants of the Endangered Species Act (PL 93-205).

There is low confidence that the IPM (Integrated Population Model) counting is any less manipulatable than the iPOM method for wolves and is unreliable. The IPOM counting method is not working for wolf management and will not work for counting grizzly bears. You are purposely ignoring updated wildlife management science conducted by Crabtree, Koch, & Lele (2023) that discusses outdated iPOM modeling. Due to the failure of the Tri-states to manage wolves, it is unreasonable to assume that states will cooperate transparency and use identical implementation of IPM counting methods.

In your proposed management strategy of Grizzly bears in the GYE, they will not exist in sufficient numbers and be under constant trophy hunting pressure, unable to roam or live without fear of extirpation. The low number limit of Grizzlies that will be allowed to exist in the GYE makes it impossible for interconnectivity, healthy function ecosystems and thriving Grizzly bears impossible. The only hope for the future of Grizzly sustainability and recovery is to provide and protect travel corridor connectivity proposed by the Yellowstone to Yukon Conservation Initiative (Y2Y). They need connectivity in protected ecosystems, not kept as exhibits within the confines of National Parks like Yellowstone, Glacier, and Grand Teton. Please reject the MOA.

Thank you for your consideration of my public comments.

Sincerely,  
Dr. Kari Gunderson  
Swan Valley, Montana

*Kari Gunderson*

**References**

Crabtree, R. L., Koch, D. C. and Lele, S. R. (2023) 'Misleading overestimation bias in methods to estimate wolf abundance that use spatial models.' Retrieved from: agriRxiv. CABI. doi: 10.31220/agriRxiv.2023.00215

U.S. Public Law 88-577. The Wilderness Act of September 3, 1964. 78 Stat. 890.

U.S. Public Law 93-205. Endangered Species Act of 1973, 87 Stat.

Yellowstone to Yukon Initiative. <https://y2y.net/>