April 03, 2019

Representative Brad Witt, Chair
House Committee on Natural Resources
900 Court St. NE
Salem Oregon 97301
Rep.bradwitt@oregonlegislature.gov

RE: OPPOSE HB 3118, regarding hunting of cougars by agents of the state

Dear Chairman Witt and Members of the Committee:

On behalf of the undersigned organizations, we would like to express our strong opposition to HB 3118 which would authorize the Oregon Department of Fish and Wildlife (ODFW) to appoint agents of the state for the purpose of killing cougars with hounds for population control without cause. This bill supports what amounts to no less than the larger-scale culling of Oregon's cougars, which is not only cruel but scientifically unsound and environmentally harmful. It is essentially an end run around Measure 18.

I. Cougars are already killed in excessive numbers in Oregon's "target zones," and HB 3118 would just add to this mortality.

Historically, ODFW has used agents to cull cougar populations in designated "target zones." Target zones, with essentially unlimited killing, benefit a small minority of houndsmen We have consistently and vehemently opposed the use of target zones as unscientific, unjustified, cruel, and an extraordinary waste of taxpayers' precious resources.[1]

HB 3118 would expand this relentless and unnecessary killing of cougars by allowing appointed agents to cull an area's cougar population, including with the use of hounds, despite the fact that the majority of Oregonians have shown twice that they oppose this practice with the passage of Measure 18. ODFW could authorize such killing if the agency deems an area's population too large, as defined within the agency's highly controversial cougar management plan and scientifically questionable cougar population model. Essentially, HB 3118 would allow anyone interested in hound hunting of cougars to do so, as an end-run around Measure 18, and without due cause.

Allowing the trophy hunting of cougars with hounds will undeniably increase cougar mortalities which are already excessive. Oregon ranks fifth highest nationwide for trophy hunting mortality of the large cats.[2] Between 2008 and 2017, trophy hunters killed nearly 2,600 cougars—but that toll never includes the orphaned kittens who died from starvation, exposure or predation as an indirect result of human persecution of their parents.

II. Hound hunting of cougars is unsporting, inhumane and detrimental to Oregon's ecosystems

Hound hunting is not considered "fair chase" hunting by most.[3] Using radio-collared trailing hounds to chase cougars and bay them into trees or rock ledges so that the trophy hunter can shoot the cat at

close range is unethical and inhumane. Furthermore, hounds kill kittens, and cougars often injure or kill hounds.[4] The practice is exceedingly stressful and energetically taxing to cougars.[5] Hounds also chase non-target wildlife and trespass onto private lands.[6]

Killing cougars is also detrimental to Oregon's sensitive and highly valued wild spaces as these native cats maintain important ecological roles. For example, their kills provide nourishment for beetles, bald eagles, black bears and dozens of other species, increasing biological diversity and ecosystem function.[7] Furthermore, research indicates that hound hunting highly disturbs deer, potentially harming deer populations on the whole.[8] This disturbance likely affects domestic livestock as well, causing stress and reducing their health and reproductive potential.

III. Increased killing of cougars will not benefit ungulate populations, nor reduce conflicts.

The best available science demonstrates that killing native carnivores to increase ungulate populations, such as mule deer, is unlikely to produce positive results. Numerous recent studies demonstrate that predator removal actions "generally had no effect" in the long term on ungulate populations.[9] Because ecological systems are complex, heavily hunting cougars will fail to address the underlying malnutrition problems that deer face.[10] Moreover, cougar populations are limited by their available resources,[11] meaning that their populations must stay at a smaller size relative to their prey or risk starvation.[12] They do this by regulating their own numbers.[13] When prey populations decline, so do cougar populations.[14]

Furthermore, research shows that trophy hunting creates social chaos in cougar communities, increasing both mortalities and conflicts. Oregon's history of indiscriminately killing large numbers of cougars through trophy hunting and heavy-handed management strategies disrupts the animals' social structure, ultimately leading to more conflicts with humans and livestock. That's because the presence of mature adult cougars is vital in controlling the population of young, inexperienced cougars. When trophy hunters remove the mature adult cougars from a population, the rest experience social chaos from the disruption. The loss of mature adults encourages young, inexperienced cougars to migrate, leading to greater aggression between cats and even more deaths to adult females and their kittens.[15] This influx of juvenile male cougars, less skilled at hunting, are also more likely to be involved in human and livestock conflicts, studies show.[16] Essentially, more trophy hunting could result in increased conflicts, not less. **In fact, in Zone A, the only region of the state that has experienced an increase in cougar conflicts, ODFW allows trophy hunting at twice the level considered sustainable by the best available science.**[17]

Conflicts with cougars are exceptionally rare. According to the U.S. Department of Agriculture, cougars account for approximately 0.05% of cattle mortalities and 0.16% of sheep mortalities.[18] In fact, 53 times more cattle and sheep die from maladies (e.g., illness, disease, birthing problems, weather, poisoning and theft), than from cougars.[19] Public education and awareness about coexisting with cougars and protecting livestock is the most effective approach to keeping conflicts low. Oregonians would benefit from increased education about humanely coexisting with cougars, rather than allowing hounds to be used for increased cougar hunting. ODFW must educate the public, including pet owners, hikers, and ranchers, on how to avoid conflicts with cougars and other top carnivores. Humane solutions, such as installing predator-proof enclosures, penning animals at night, and utilizing

frightening devices, are readily available to reduce or entirely prevent potential conflicts between cougars and livestock.

IV. Conclusion.

In summary, efforts to expand the use of appointed agents to cull cougar populations, including with the use of hounds, is harmful and not in favor with the majority of Oregonians who voted to prohibit hound hunting and are generally opposed to the trophy hunting of cougars in our state.[20] Oregon's cougar population already experiences significant mortality through trophy hunting. The practice is unnecessary and not an effective solution to reduce conflicts or increase prey populations.

Instead, legislators should urge ODFW to take proactive steps to reduce conflicts through improved cougar management, including reduced quotas, and providing sufficient education and tools to the public to better prevent avoidable conflicts with cougars. Furthermore, legislators must call on ODFW to allow for extensive external peer review of their cougar management plan and population model, incorporating and basing management decisions on the best available science from their peers across the country. Calling for the widespread killing of cougars without valid science is an injustice to Oregonians and our wildlife. **Therefore, we ask you to oppose HB 3118 and protect Oregon's cougars from unnecessary culling efforts.**

Thank you for your consideration.

Sincerely,

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

Haley Stewart
Wildlife Protection Manager
The Humane Society of the United States

Brian Posewitz
Board Member
Humane Voters Oregon

Bob Sallinger
Conservation Director
Audubon Society of Portland

Nick Cady
Legal Director
Cascadia Wildlands

John W. Laundré, Ph.D.
Large Predator Prey Ecologist

Prof. Robert Wielgus, Ph.D.
Former Director (retired)
Large Carnivore Conservation Lab
Washington State University

Sharon Harmon
President and CEO
Oregon Humane Society

Danielle Moser
Wildlife Program Coordinator
Oregon Wild

Stephen Wells
Executive Director
Animal Legal Defense Fund

Katie Bahr
Oregon State Director
Humane Society Veterinary Medical Association

Lynn Cullens
Executive Director
Mountain Lion Foundation

Noah Greenwald, M.S.
Endangered Species Director
Center for Biological Diversity

Nancy Warren
Executive Director
National Wolfwatcher Coalition

Wally Sykes
Co-Founder
Northeast Oregon Ecosystems

Camilla H. Fox
Founder & Executive Director
Project Coyote

Brooks Fahy
Executive Director
Predator Defense

Rhett Lawrence
Conservation Director
Sierra Club, Oregon Chapter

Sarah McMillan
Conservation Director
WildEarth Guardians

Jane Goodall, Ph.D., D.B.E.
Marc Bekoff, Ph.D.
Thomas Mangelsen, Photographer
Rick Hopkins, Ph.D.
Patricio Robles-Gil
Corrine Rutledge
Cara Blessley-Lowe
Board of Directors
The Cougar Fund

Rene Tatro
Lake Oswego Sportsmen & NRA member

cc: Kailey Kornhauser, LPRO Analyst, Kailey.Kornhauser@oregonlegislature.gov
Shelley Razska, Committee Assistant, Shelley.Razska@oregonlegislature.gov
Amira Streeter, Natural Resources Policy Advisor, Amira.streeter@oregon.gov
Representative Tina Kotek, House Speaker, rep.tinakotek@oregonlegislature.gov
Senator Michael Dembrow, Chair, Senate Environment and Natural Resources Committee, Sen.MichaelDembrow@oregonlegislature.gov

---

[1] In 2015 alone, ODFW targeted large numbers of cougars in select target zones on 6,236 square miles of Oregon's lands and permitted the indiscriminate killing of cougars using packs of hounds and/or neck snares. These state-administered practices cost up to several thousand dollars per cougar. According to ODFW's Draft Cougar Management Plan, between 2006 and 2014, 349 cougars were killed in target zones at a total cost of $517,332. This amounts to an average cost of $1,482, with ranges of $461 to $3,796 per cougar (Oregon Dept. of Fish & Wildlife. 2017. 2017 Oregon Cougar Management Plan).

[2] The Humane Society of the United States. 2017. State of the Mountain Lion: A Call to End Trophy Hunting of America's Lion. Washington, DC.
The Humane Society of the United States and Humane Society International. 2016. Cecil 2: Trophy Hunting America's Lion.

[3] Posewitz, J. 1994. Beyond Fair Chase: The Ethic and Tradition of Hunting. Falcon Press, Helena, Montana; Teel, T. L., R. S. Krannich, and R. H. Schmidt. 2002. Utah stakeholders' attitudes toward selected cougar and black bear management practices. Wildlife Society Bulletin 30:2-15.

[4] Lindzey, F. G., W. D. Vansickle, S. P. Laing, and C. S. Mecham. 1992. Cougar Population Response to Manipulation in Southern Utah. Wildlife Society Bulletin 20:224-227; Logan, K. A., and L. L. Sweanor. 2001. Desert puma: evolutionary ecology and conservation of an enduring carnivore. Island Press, Washington, DC; Elbroch, L. M., B. D. Jansen, M. M. Grigione, R. J. Sarno, and H. U. Wittmer. 2013. Trailing hounds vs foot snares: comparing injuries to pumas Puma concolor captured in Chilean Patagonia. Wildlife Biology 19:210-216.

[5] Harlow, H. J., F. G. Lindzey, W. D. V. Sickle, and W. A. Gern. 1992. Stress Response of Cougars to Nonlethal Pursuit by Hunters. Canadian Journal of Zoology **70**:136-139; Bryce, C. M., C. C. Wilmers, and T. M. Williams. 2017. Energetics and Evasion Dynamics of Large Predators and Prey: Pumas Vs. Hounds. PeerJ e3701.

[6] Grignolio, S., E. Merli, P. Bongi, S. Ciuti, and M. Apollonio. 2011. Effects of Hunting with Hounds on a Non-Target Species Living on the Edge of a Protected Area. Biological Conservation 144:641-649; Mori, E. 2017. Porcupines in the landscape of fear: Effect of hunting with dogs on the behaviour of a non-target species. Mammal Research 62:251-258; Hristienko, H., and J. McDonald, John E. 2007. Going into the 21st century: a perspective on trends and controversies in the management of the black bear Ursus 18:72-88.

[7] See: e.g., Weaver, J. L., P. C. Paquet, and L. F. Ruggiero. 1996. Resilience and conservation of large carnivores in the Rocky Mountains. Conservation Biology 10:964-976; Ripple, W. J., and R. L. Beschta. 2006. Linking a cougar decline, trophic cascade, and catastrophic regime shift in Zion National Park. Biological Conservation 133:397-408; Elbroch, L. M., and H. U. Wittmer. 2012. Table scraps: inter-trophic food provisioning by pumas. Biology letters 8:776-779; Estes, J. A., J. Terborgh, J. S. Brashares, M. E. Power, J. Berger, W. J. Bond, S. R. Carpenter, T. E. Essington, R. D. Holt, J. B. C. Jackson, R. J. Marquis, L. Oksanen, T. Oksanen, R. T. Paine, E. K. Pikitch, W. J. Ripple, S. A. Sandin, M. Scheffer, T. W. Schoener, J. B. Shurin, A. R. E. Sinclair, M. E. Soule, R. Virtanen, and D. A. Wardle. 2011. Trophic Downgrading of Planet Earth. Science 333:301-306; Elbroch, L. M., P. E. Lendrum, M. L. Allen, and H. U. Wittmer. 2015. Nowhere to hide: Pumas, black bears, and competition refuges. Behavioral Ecology 26:247-254; Elbroch, L. M., C. O'Malley, M. Peziol, and H. B. Quigley. 2017. Vertebrate diversity benefiting from carrion provided by pumas and other subordinate apex felids. Biological Conservation 215:123-131.

[8] Grignolio, S., E. Merli, P. Bongi, S. Ciuti, and M. Apollonio. 2011. Effects of Hunting with Hounds on a Non-Target Species Living on the Edge of a Protected Area. Biological Conservation 144:641-649.

[9] T. D. Forrester and H. U. Wittmer, "A Review of the Population Dynamics of Mule Deer and Black-Tailed Deer Odocoileus Hemionus in North America," *Mammal Review* 43, no. 4 (Oct 2013), http://dx.doi.org/10.1111/mam.12002., p. 300, R. J. Lennox et al., "Evaluating the Efficacy of Predator Removal in a Conflict-Prone World," *Biological Conservation* 224 (2018).

[10] e.g. K. L. Monteith et al., "Life-History Characteristics of Mule Deer: Effects of Nutrition in a Variable Environment," *Wildlife Monographs* 186, no. 1 (Jul 2014), http://dx.doi.org/10.1002/wmon.1011; Forrester and Wittmer; K. F. Robinson et al., "Can Managers Compensate for Coyote Predation of White-Tailed Deer?," *Journal of Wildlife Management* 78, no. 4 (May 2014), http://dx.doi.org/10.1002/jwmg.693.

[11] 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).

[12] I. A. Hatton et al., "The Predator-Prey Power Law: Biomass Scaling across Terrestrial and Aquatic Biomes," *Science* 349, no. 6252 (2015).

[13] A. D. Wallach et al., "What Is an Apex Predator?," *Oikos* 124, no. 11 (Nov 2015), http://dx.doi.org/10.1111/oik.01977.

[14] Stoner, Wolfe, and Choate.

[15] C. M. S. Lambert et al., "Cougar Population Dynamics and Viability in the Pacific Northwest," Journal of Wildlife Management 70 (2006); H. S. Cooley et al., "Does Hunting Regulate Cougar Populations? A Test of the Compensatory Mortality Hypothesis," Ecology 90, no. 10 (Oct 2009), http://dx.doi.org/10.1890/08-1805.1; 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); R. B. Wielgus et al., "Effects of Male Trophy Hunting on Female Carnivore Population Growth and Persistence," Biological Conservation 167 (Nov 2013), http://dx.doi.org/10.1016/j.biocon.2013.07.008; 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 (Jul 2014), http://dx.doi.org/10.1002/jwmg.726; D. C. Stoner et al., "Dispersal Behaviour of a Polygynous Carnivore: Do Cougars Puma Concolor Follow Source-Sink Predictions?," Wildlife Biology 19, no. 3 (Sep 2013), http://dx.doi.org/10.2981/12-124.

[16] Beausoleil et al; Kaylie A. Peebles et al., "Effects of Remedial Sport Hunting on Cougar Complaints and Livestock Depredations," PLOS One 8, no. 11 (Nov 19 2013), http://dx.doi.org/10.1371/journal.pone.0079713.

[17] In 2018, 180 cougars were killed by trophy hunters in Zone A, the only region of the state with increased conflicts. With a total population estimate of approximately 1,150 cats total, or around 600-700 adult cats, the trophy hunting mortality rate was 25-30%. Research shows that a sustainable level of mortality is approximately 14%. This high level of mortality can lead to increased conflicts with humans, pets and livestock.

[18] U.S. Department of Agriculture-Animal and Plant Health Inspection Service-Veterinary Services, "Death Loss in U.S. Cattle and Calves Due to Predator and Nonpredator Causes, 2015," *https://www.aphis.usda.gov/animal_health/nahms/general/downloads/cattle_calves_deathloss_2015.pdf* (2017); U.S. Department of Agriculture-Animal and Plant Health Inspection Service, "Sheep and Lamb Predator and Nonpredator Death Loss in the United States," *http://usda.mannlib.cornell.edu/usda/current/sgdl/sgdl-05-27-2010.pdf* (2015).

[19] Ibid.

[20] Remington Research Group. 2019. Oregon Public Opinion January 2019. Kansas City, MO.