



August 22, 2023

Idaho Department of Fish and Game
Attn: Rick Ward, State Wildlife Manager
600 S. Walnut Street
Boise, ID 83712

Re: Draft Idaho Mountain Lion Management Plan 2024-2029

Dear Mr. Ward,

Idaho Wildlife Federation (IWF) appreciates the opportunity to provide comments on the Draft Idaho Mountain Lion Management Plan 2024-2029 (Plan).

IWF is Idaho’s oldest statewide conservation organization, founded by sportsmen and women in 1936. Today, we represent a nonpartisan voice of 28 affiliate organizations and 45,000 affiliate members and individual supporters who desire to sustain and enhance Idaho’s fish and wildlife, conserve their habitat, and maximize sporting opportunity for current and future generations. Our efforts advance “made in Idaho” solutions to the modern challenges of wildlife management.

The Draft Idaho Mountain Lion Management Plan will provide guidance to Idaho Department of Fish and Game (IDFG) staff to improve mountain lion monitoring and management at a landscape-scale for the next 6 years. IWF is grateful to IDFG staff for the time they invested in the development of this Plan and is largely supportive of the Plan’s objectives and priorities. We briefly offer our comments and suggestions below.

Plan Update

Idaho is currently one of the fastest growing states in the United States. As our state grows to accommodate new residents, our wildlife populations will face increased pressures, both direct and indirect. Amidst these pressures, it is our duty to ensure that wildlife populations and their habitats remain healthy and productive. Part of that duty is management of wildlife populations based on the best available and most recent science. We appreciate IDFG’s efforts to update the 2002-2010 Mountain Lion Management Plan through this draft Plan to incorporate new data, research, population monitoring, and management methods that better fit with today’s challenges.

IWF is thankful for the narrative in the Plan that describes the intent to move away from the 2002-2010 Mountain Lion Management Plan's focus on Data Analysis Units (DAUs) and a shift towards managing populations on a regional scale. We support this change as it seems that the current framework may be too granular in scale in order to accurately interpret harvest and population trends, age structure, and distribution.

Management considerations based on ungulate population metrics

On Page 31 of the Plan, IDFG outlines mountain lion management considerations based on ungulate population metrics. If ungulate populations have been determined to be underperforming or are below objectives, the table directs IDFG to increase adult female lion harvest over 25%. This management direction may make sense in certain cases; the Plan notes Anderson and Lindzey (2005) found that when adult (>3 years old) females comprised 25% or more of the total harvest lion populations declined. However, we do not see a concrete plan that IDFG intends to deploy if increased harvest of adult females is desired. Simply offering a second tag or increased nonresident participation does not guarantee higher proportions of adult females harvested. We recommend developing more guidance language in the Plan on how IDFG intends to achieve this goal if ungulate populations are underperforming and mountain lions are an additive form of ungulate mortality. In many cases, consistent outreach to the hound hunting community may be necessary in order to move toward desired population outcomes.

Management considerations based on conflict

Page 32 describes the Department's management considerations based on conflict with humans and livestock. One management consideration is the use of kill permits for individual producers. We recommend providing a brief description of what the traditional parameters for a mountain lion kill permit looks like, including lawful methods of take for the big game species.

Nonresident participation

The Plan states that nonresidents are limited to 70 hound hunter permits (who are not Idaho licensed outfitters), with exceptions for the Lolo, Selway, and Middle Fork Elk Zones to help address the impact of predation on elk populations. As neighboring states become more restrictive on mountain lion hunting in comparison to Idaho, we are interested in learning more about the potential for an increase in nonresident desire to pursue lions. We cannot find any data in the Plan or on IDFG's website that provides the public with nonresident hound hunter permit draw odds and how many nonresidents apply each year. It may be beneficial to begin to publicly display this data to better understand the social interest in lion hunting from nonresidents.

Technical Assistance

As local, state, and federal agencies consider projects and management actions that could impact mountain lion populations throughout the state, it is crucial that these entities are provided with IDFG's best available science to help guide these decisions. We recommend the Department incorporate language in the Plan that offers assistance from the Technical Services Bureau to supply decision makers with emerging data on mountain lions, similar to the bureau's efforts around ungulate movement and migrations and highway safety projects.

Thank you for the opportunity to provide comments. We look forward to the implementation of this Plan.



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