

Colin Croft
210087 Turkey Drive
Gering, NE 69341
August 15, 2025

RE: Public comment requested to be included as part of the hearing record for NGPC hearing 8.22.25 to consider amendments to Title 166, Nebraska Administrative Code Chapter 20 Mountain Lions

Commissioners,

I continue to oppose *any* hunting quota for Wildcat Hills mountain lions (until a credible population estimate reveals the population is healthy/stable), let alone one exceeding your own staff's recommendation.

I've read the Minutes from your June meeting, including testimony/comments supporting an increased Wildcat Hills quota. None of these comments, in my opinion, provide a convincing reason for increasing quota.

I've seen no evidence—and NGPC staff have provided none—that bighorn sheep (Mr. Barta) or bobcat or porcupine (Ms. Brown) numbers are even down, let alone down due to mountain lions. My trail cameras throughout the Wildcats, as well as my personal observation of all these species on my Wildcat Hills property and Wildcat Hills public lands I visit frequently, indicate something very different from what Ms. Brown describes. If Ms. Brown is concerned about not seeing as many bobcats as she would like, she should investigate the virtually unregulated/unrestricted hunting and trapping of them NGPC allows rather than assuming that mountain lions are to blame.

All the incidents described by Mr. Ammon date back to Fall 2021, and some of these I'd hardly characterize as "dangerous" mountain lion encounters (e.g. a mountain lion merely crossing someone's rural property or passing near hunters hunting the same prey as the cat in the wild places these cats are supposed to live/hunt). Since Mr. Ammon has described no incidents since 2021, I think we can assume that those lions have either moved on or were killed by the public or NGPC staff.

The key point to bear in mind is that mountain lion hunting is hardly the only remedy for incidents like those reported by Mr. Ammon or Mr. Darnall. We're not in California where the public, landowners, livestock producers, etc. must wait for state officials to "sign off" on lethal measures for mountain lions. Nebraska has one of the more lenient/permissive laws among mountain lion states (Neb. Rev. Stat. § 37-559), allowing anyone to kill mountain lions in the situations described by some of the comments (self-defense or livestock protection). And no serious person with knowledge about Nebraska/Nebraskans would believe that someone killing a mountain lion under § 37-559 would be "second guessed" by law enforcement or NGPC and risk any kind of prosecution/legal liability. Bottom-line: Nebraska has what basically amounts to a "license to kill" mountain lions with about zero chance of being questioned/challenged after the fact. And that's just what has happened during the last 18 months: at least 11 Wildcat Hills lions were killed ("removed") pursuant to § 37-559: 5 by the public, 5 by NGPC, and 1 by law enforcement.

Instead of exercising their legal right under 37-559, it is suggested that mountain lion problems (or I should say possible problems, since none of the comments state that mountain lions actually attacked people or livestock) can or should be "proactively" prevented by increased lion hunting quotas. But unless it is being suggested that we go back to the days noted by Mr. Ammon and Darnall when no mountain lions were ever seen on their properties—true because we had killed them all off in Nebraska—recreational hunting is no solution to mountain lion conflicts.

Mountain lions—much like humans and plenty of other animals—are individuals, not interchangeable numbers on a spreadsheet. Individual mountain lions sometimes can and do create problems, and those problems should be handled individually—as § 37-559 allows and as members of the public, law enforcement, and NGPC have done over the last 18 months. Recreational mountain lion hunting in Nebraska amounts to killing whichever random cats end up being found in specific regions/“units” when hunting season begins January 1st. It does not and could not limit hunting to “problem” cats. It accomplishes nothing more than killing random cats, and makes no more sense than hoping to reduce crime in your town by executing random people—rather than the criminals-- to supposedly reduce future crimes.

What hunting does do, however, is destabilize established mountain lion social networks, since hunters typically seek out the most desirable “trophy” animals: the larger, older males who typically control territories and social networks. The fact that these larger/older males are still alive (ie. not killed under laws like § 37-559) means they are not problem cats. But the ones who rush into a destabilized social network may well be. So it’s no surprise that the research that has been done on this has found that while increased hunting may feel like the right thing to do, it actually *increases* the risk of cougar conflicts like depredation.¹

21 Wildcat Hills mountain lions have been killed in the last 18 months, including (it appears) several of the ones described in a couple of the comments. And this is for a population that NGPC’s own staff estimated to have a population of only **18** as late as January 2025 (!). No more killing should occur until credible population estimates are made showing that the Wildcat Hills population is stable and sustainable.

Respectfully submitted,

/s/

Colin Croft

¹ **Elbroch & Treves 2023:** Perspective: Why might removing carnivores maintain or increase risks for domestic animals (<https://doi.org/10.1016/j.biocon.2023.110106>) (concluding that although state agencies continue to rely heavily on lethal removal of carnivores, in part “because such actions are seen as addressing rather than ignoring the problem,” a growing body of evidence shows that such removal either has “no effect” on future livestock depredation, or can actually increase the risk of such depredation)

Dellinger et al 2021: Temporal Trends and Drivers of Mountain Lion Depredation in California, USA (<https://digitalcommons.usu.edu/hwi/vol15/iss1/21/>) (reviewing 48 years of ML depredations in CA and finding that lethal removal of mountain lions from an area the year before had a positive relationship (= *increased* likelihood) of depredations the following year)

Laundre & Papouchis 2020: The Elephant in the room: What can we learn from California regarding the use of sport hunting of pumas (*Puma concolor*) as a management tool (<https://doi.org/10.1371/journal.pone.0224638>) (comparing non-hunting state of California with the 10 states where cougars are hunted, and finding no evidence that sport hunting achieved any claimed management objectives (e.g. controlling cougar populations, reducing cougar-human encounters/conflicts, and reducing livestock predation) beyond providing recreational hunting opportunities)

[comment submitted for 6.13.25 hearing]

Colin Croft
210087 Turkey Drive
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June 10, 2025

RE: Public comment requested to be included as part of the hearing record for NGPC hearing 6.13.25 to consider amendments to Title 166, Nebraska Administrative Code Chapter 20 (formerly Title 173 Chapter 4 Section 037) Mountain Lions

I oppose these proposed changes, **particularly the inclusion of *any* season for the Wildcat Hills population considering the shocking number of “known mortalities (21!) for this population from 2024 through only March of this year.** The data staff has released demonstrates a level of mortality and scientific uncertainty that makes *any* additional sport hunting in the Wildcat Hills biologically and ethically indefensible:

1. Unprecedented Recent Mortality

- **12 known mountain-lion deaths have already occurred through March 2025** (presumably this includes the 3 taken in the 2025 hunt).
- **9 additional mortalities were documented in 2024.**
- Taken together, these **21 deaths in just 17 months** vastly exceed the “< 2 mortalities per year” recorded from 2021–2023 and equal—or surpass—plausible estimates of annual recruitment.

2. Dwindling Population Estimates

- The most reliable mark-recapture estimate presented is **18 individual lions** as of January 2025 (which itself is characterized as “likely biased.”)
- If 12 of those animals are already confirmed dead, up to **two-thirds of the known population has been removed** before natural mortality, poaching, or additional dispersal are considered.
- Independent field observations echo this decline: Multiple trail cameras that I have operated in and around the Old State Hill/Wildcat Hills Nature Center & WMA show an **80–90 % reduction in mountain-lion triggers in 2024 and so far in 2025 compared with identical effort in 2023 and earlier. Cameras I operate in other areas within the Wildcat Hills “unit” show a 50-75% reduction. Whatever truth there may be to immigration from nearby populations replenishing the Wildcat Hills population, my trail camera results have yet to reflect that.**

3. Declining Reproduction

- Staff noted a drop from **seven litters in 2023 to just four in 2024.**
- At least one known adult female is among the recent mortalities, further eroding the breeding base.

4. Absence of a Science-Based Harvest Model

- The 2025 document openly concedes that both abundance estimates are “likely biased” and that the population is now “significantly reduced.”
- No age- or sex-structured population-viability analysis (PVA), sustainable-yield calculation, or immigration-rate modeling has been provided to show that any future quota—let alone the cumulative toll of unplanned deaths—can be sustained.

5. Management Objectives Already Met—If Not Far Exceeded

The stated goal of the 2025 season was to keep numbers “below the 2024 peak” and address localized concerns. The **unexpected spike in non-hunting mortality has already lowered the population well below peak levels**, rendering further sport harvest unnecessary to achieve management targets.

Finally, I want to reiterate the point I made at last year’s meeting in North Platte. Staff’s claims in these “mountain lion booklets” about public and landowner “tolerance,” “social acceptance,” etc. regarding the hunting of mountain lions are not based on anything resembling quality social scientific evidence/data. Relying on comments from periodic “big game meetings” (and even these comments are not transparently provided so that the public can determine whether staff’s characterization of them in these “booklets” is accurate) falls far short of the “sound science” wildlife managers continually assure the public they rely upon. South Dakota’s 2024 Mountain Lion Management Public Opinion Survey² proves that social science research of this type is feasible for a state like Nebraska.

Accordingly, I urge the Commission to **suspend any 2026 Wildcat Hills mountain lion hunting season until the population shows a clearly documented rebound.**

Respectfully submitted,

/s/

Colin Croft

² https://gfp.sd.gov/userdocs/docs/mountain_lion_public_opinion_survey_report.pdf