



Alberta Wilderness Association
"Defending Wild Alberta through Awareness and Action"

December 11, 2024

Hon. Todd Loewen
Minister of Forestry and Parks
Government of Alberta
By e-mail: FP.Minister@gov.ab.ca, Todd.Loewen@gov.ab.ca

Dear Minister Loewen,

Alberta Wilderness Association (AWA) is writing to oppose the recent decision that expands cougar hunting into Cypress Hills Interprovincial Park and increases cougar quotas. We request the ministry promptly reverse these decisions until cougar quotas are proven to be sustainable and beneficial for cougar populations, ecosystem health and management of human-cougar conflicts. Wildlife are a public resource, and should be managed to the benefit of all Albertans. Cougar hunting quotas and other wildlife management decisions must be based on the best available data, and decisions must be open to public consultation.

Founded in 1965, AWA strives to help Albertans understand the intrinsic values that wildlife and wilderness provide and encourages communities to participate in conservation initiatives that will ensure a legacy for future generations. With over 7,000 members and supporters in Alberta and across Canada, AWA is dedicated to conserving and protecting Alberta's wilderness.

AWA believes that hunting, trapping, and fishing should be carried out humanely and sustainably, and these activities must not damage the long-term health and viability of wildlife populations. The precautionary principle should prevail: hunting, trapping, and fishing should only be practiced where valid and independent scientific studies demonstrate there will be no harm to wild populations. Following the principles of science-based management and government transparency, we seek to understand the evidence behind the decision to expand cougar hunting, including scientific data as well as consultations with stakeholders.

We request you provide scientific evidence to support your statements on cougar populations and hunting in Alberta, as well as your reasons for the decision to expand cougar hunting. We ask that information be provided on any consultations that informed this decision, and that cougar management is based on science. Our detailed requests are listed below.

1. Provide evidence for the need to cull cougar populations in Alberta.

In recent interviews¹, you have stated, “When it comes to cougars, we have Alberta’s cougar management plan. That management plan indicates that we want to keep a healthy population of cougars on the landscape of about 1,500 animals. Presently we have about 2,000 cougars in the province.” You have also indicated that culling of this population is needed, and that “the population is growing and spreading.”²

Alberta’s 2019 estimate of cougar populations suggested there were 1,559 cougars in the province, a decline from the 2,051 cougars estimated in 2012³. The estimate also indicated only 795 adults in the province, suggesting roughly half of the population is old enough to reproduce and restore population numbers. Alberta’s Cougar Management Plan lists an objective to “Maintain a viable population of at least 1,500 cougars on provincial lands in Alberta (emphasis added).” Given this information, cougar populations are already precariously close to the minimum viable population in the province.

The Management Plan sets an objective to “Allow a maximum human-caused mortality rate of not more than 20 per cent of the provincial cougar population,” although cougars are generally managed “to keep quota harvest around 14 percent while not exceeding 16 percent of the estimated adult population in a given CMA [Cougar Management Area]”⁴. Human-caused mortality includes trapping, non-resident hunting, landowner hunting and removal and accidental deaths, as well as resident hunting that must follow established quotas. In previous years, resident hunting has accounted for roughly half of cougar mortalities⁵.

¹ Global News. December 4, 2024. Available at: <https://globalnews.ca/video/10902585/alberta-wildlife-advocates-question-changes-to-cougar-hunting>

² CBC Eyeopener. December 5, 2024. Alberta opens up cougar hunting areas, quotas. Available at: <https://www.cbc.ca/player/play/video/9.6583728>

³ Government of Alberta. 2019. 2019 Winter Cougar Season Quota Updates: Table 1. Available at: <https://open.alberta.ca/dataset/47800551-ff59-4cde-bfcd-ee9e1f925a2a/resource/f3fe1139-df8c-46a4-a86e-19fb6f40b4ff/download/aep-2019-winter-cougar-season-quota-updates.pdf>

⁴ Government of Alberta. 2022. 2022 Winter Cougar Season Quota Updates. Available at: <https://open.alberta.ca/dataset/47800551-ff59-4cde-bfcd-ee9e1f925a2a/resource/196dab3b-dcfd-49fb-bceb-19c7a60b9a7e/download/epa-winter-cougar-season-quota-updates-2022.pdf>

⁵ Government of Alberta. 2024. Cougar Mortality in Alberta from April 1, 2023 to March 31, 2024. Available at: <https://open.alberta.ca/dataset/81d6eb6a-1654-4544-b218-2efc4eaca010/resource/291ee155-29e5-46d3-9977-c345623e5cc8/download/fp-cougar-mortality-alberta-2023-2024.pdf>

Cougar quotas were reduced for some CMAs in 2022 to “move closer to 14-16 percent threshold removal rate of the estimated adult population⁶.” Assuming cougar populations have remained stable at roughly 795 adults since 2019, a 14-16 percent removal rate would be 111 to 127 cougars across the entire province. The current quota of 133 cougars⁷ exceeds this threshold, not accounting for additional mortality outside the hunting season. Last year, 176 cougars were killed, roughly 22 percent of the estimated adult population. This high quota is likely to result in population decline.

We request that you provide evidence to support your claim that there are 2,000 cougars in the province, that populations are growing, and the population needs to be culled.

2. Provide evidence that supports the use of hunting to manage human-cougar conflicts.

You also stated that your decision to expand Cougar Management Areas north and into the Peace Country was because there had been “a lot of negative interaction between cougars and landowners and individuals.⁸”

Human-cougar conflicts in Alberta have generally declined in recent years. In 2023-2024, only 3 cougars were identified and killed as “problem” animals, with only 1 mortality outside of the previous 32 Cougar Management Areas⁹. In Bow Valley, human-cougar occurrence has decreased since 2013¹⁰, and across the province, problem cougar mortality has been in decline.

In addition, cougar hunting has been shown to destabilize the social structure, increasing conflict. Trophy hunting generally targets larger, older and dominant cougars. Younger cougars, who will enter and compete for the territory of mature cougars that were killed, are more likely to target easier prey such as livestock and domestic animals, increasing human-wildlife

⁶ Government of Alberta. 2022. 2022 Winter Cougar Season Quota Updates. Available at: <https://open.alberta.ca/dataset/47800551-ff59-4cde-bfcd-ee9e1f925a2a/resource/196dab3b-dcfd-49fb-bceb-19c7a60b9a7e/download/epa-winter-cougar-season-quota-updates-2022.pdf>

⁷ My Wild Alberta. 2024. Cougar Hunting Seasons and CMAs. Retrieved December 5, 2024 from: <https://mywildalberta.ca/hunting/game-species/cougar-hunting-alberta/cougar-hunting-seasons-cmas.aspx>

⁸ CBC Radio Edmonton. December 5, 2024. Interview with Minister Loewen.

⁹ Government of Alberta. 2024. Cougar Mortality in Alberta from April 1, 2023 to March 31, 2024. Available at: <https://open.alberta.ca/dataset/81d6eb6a-1654-4544-b218-2efc4eaca010/resource/291ee155-29e5-46d3-9977-c345623e5cc8/download/fp-cougar-rmortality-alberta-2023-2024.pdf>

¹⁰ Government of Alberta. 2019. Cougar Occurrence Summary 2000-2018: Human-Cougar Coexistence in the Bow Valley. Available at: <https://open.alberta.ca/dataset/314e2bdd-08c0-48d0-bc21-2f871b04af71/resource/bc5f7c93-80bb-4c79-a382-03eefe6b63da/download/aep-cougar-occurrence-summary-2000-2018.pdf>

conflict^{11,12}. In Alberta, years of high cougar hunting and human-caused mortality were strongly and significantly (linear regression, $p < 0.05$) correlated with higher numbers of problem cougar removal (see Appendix I).

Alberta's 2012 Cougar Management Plan states as objectives for Protection of Private Property:

- a) Ensure that cougar predation on livestock and pets are reduced as much as possible by planned land management and agricultural development and by preventative livestock management.
- b) Reduce economic loss as a result of cougar predation by continuing the Wildlife Predator Compensation Program.
- c) Reduce the occurrence of chronic cougar problems on private lands by capture and translocation or euthanasia of offending individuals

The Management Plan does not suggest hunting as a solution to conflict.

Increasing cougar hunting is unlikely to reduce human-cougar conflicts. Available evidence instead suggests hunting will destabilize the social structure and increase conflicts. We request that you provide any evidence which supports cougar hunting as a method to reduce or control human-wildlife conflict.

3. Provide documentation of consultations with stakeholders, biologists and experts.

With regards to consultation, you have indicated, "we have the biologists and the staff within the hunting and fishing branch in our department that reaches out and does consultation with the different people across the landscape, and that's how we gather that information and move forward."¹³

We request any documentation of consultations with stakeholders or with biologists be released, as well as other information that was used to reach the current decision. We also request that AWA is included in any future consultations around wildlife management. We ask for an appropriate contact to connect with and better understand wildlife management decisions.

¹¹ Peebles, K. A., Wielgus, R. B., Maletzke, B. T., & Swanson, M. E. (2013). Effects of remedial sport hunting on cougar complaints and livestock depredations. *PLoS one*, 8(11), e79713.

¹² Laundré, J. W., & Papouchis, C. (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?. *PLoS One*, 15(2), e0224638.

¹³ CBC Eyeopener. December 5, 2024. Alberta opens up cougar hunting areas, quotas. Available at: <https://www.cbc.ca/player/play/video/9.6583728>

4. Release data related to monitoring of cougar populations and other wildlife publicly.

In response to the question of ensuring overhunting has not occurred, you replied, “if we hear reports that there's any kind of reduction and you know, we do have our biologists out there in the landscape too that are looking at things both in the Hunting and Fishing branch and the Fish and Wildlife branch and they provide us good information on that.”¹⁴

AWA requests any monitoring plans and data collected from monitoring of cougar populations be released publicly, as well as other information collected through monitoring programs by government biologists. If cougar populations are shown to be declining, hunting quotas must immediately be paused and reassessed to allow population recovery.

Cougars have an important role in controlling herbivore populations and preventing soil and water degradation. In Zion National Park, cougars abundance was shown to control deer populations, protecting cottonwood trees and preventing riverbank erosion¹⁵. Throughout the Americas, cougars are also important for energy transfer and nutrient cycling¹⁶. Cougar presence can complement other predators, such as wolves¹⁷ or bears¹⁸, to create cascading effects on prey populations and ecosystems. The full impacts of any increases in quotas on cougar populations, as well as the consequences for the entire ecosystem, need to be thoroughly assessed and recorded.

Wildlife management must be based on science, and decisions that affect wildlife populations must be consulted on broadly and publicly. Hunting quotas must reflect available data and allow for a sustainable wildlife population. Transparency and accountability are essential for ensuring the long-term sustainability of Alberta’s biodiversity.

Thank you for your attention to this matter. We look forward to your response and to gaining a better understanding of the basis for the recent changes to cougar hunting.

¹⁴ CBC Eyeopener. December 5, 2024. Alberta opens up cougar hunting areas, quotas. Available at:

<https://www.cbc.ca/player/play/video/9.6583728>

¹⁵ Ripple, W. J., & Beschta, R. L. (2006). Linking a cougar decline, trophic cascade, and catastrophic regime shift in Zion National Park. *Biological Conservation*, 133(4), 397-408.

¹⁶ LaBarge, L. R., Evans, M. J., Miller, J. R., Cannataro, G., Hunt, C., & Elbroch, L. M. (2022). Pumas Puma concolor as ecological brokers: a review of their biotic relationships. *Mammal Review*, 52(3), 360-376.

¹⁷ Kunkel, K. E., Atwood, T. C., Ruth, T. K., Pletscher, D. H., & Hornocker, M. G. (2013). Assessing wolves and cougars as conservation surrogates. *Animal Conservation*, 16(1), 32-40.

¹⁸ Engebretsen, K. N., Beckmann, J. P., Lackey, C. W., Andreasen, A., Schroeder, C., Jackson, P., & Young, J. K. (2021). Recolonizing carnivores: Is cougar predation behaviorally mediated by bears?. *Ecology and Evolution*, 11(10), 5331-5343.

Sincerely,
ALBERTA WILDERNESS ASSOCIATION



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Appendix I: Cougar mortality and problem cougar removal

Data was retrieved from Cougar mortality in Alberta reports, available through the Alberta Open Government Project. Statistical Analysis was conducted on R, version 4.3.1.

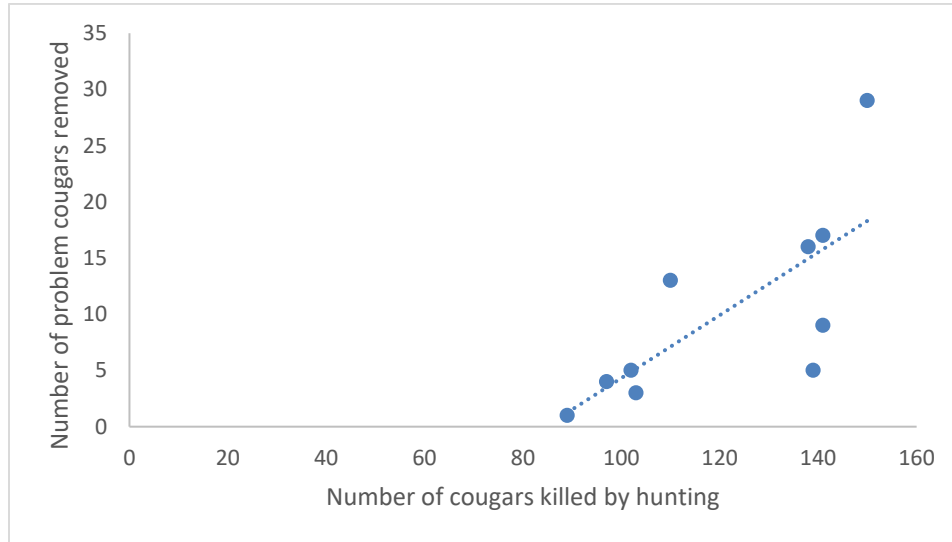


Figure 1. Number of cougars killed by resident and non-resident hunting, and number of problem cougars removed in the corresponding year across Alberta. Problem cougars increased significantly with hunting (linear regression, $t=3.08$, $p=0.0151$).

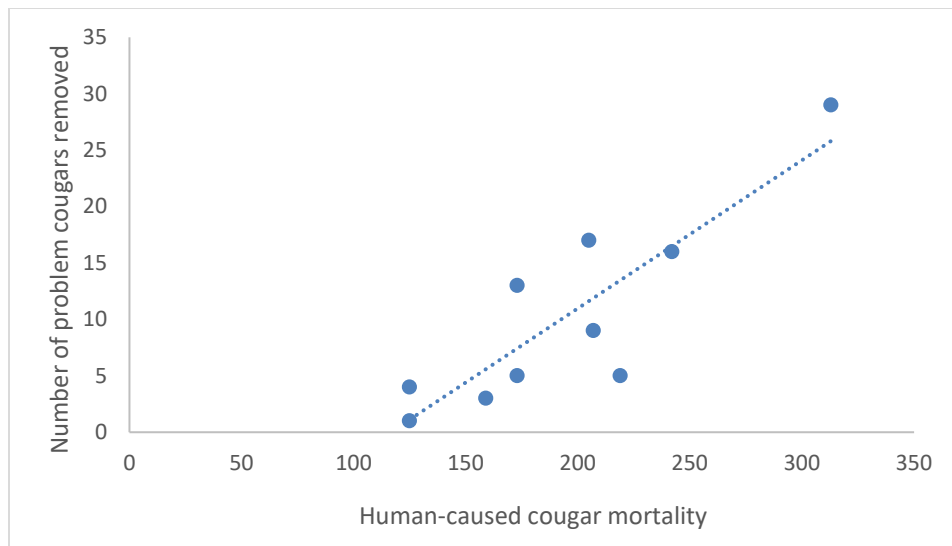


Figure 2. Number of cougar mortalities as a result of human causes (hunting, trapping, landowner removals), and number of problem cougars removed in the corresponding year across Alberta. Problem cougars increased significantly with human-caused mortality (linear regression, $t=4.84$, $p=0.0013$).