

Communication from Public

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Council File No: 20-0002-S20
Comments for Public Posting: Please see the attached comment letter from the Center for Biological Diversity in support of the resolution.



March 6, 2020

Sent via email

Los Angeles Office of the City Clerk
200 N. Spring Street
City Hall - Room 360
Los Angeles, CA 90012
CityClerk@lacity.org

Re: State Legislative Program / Depredation Permits for Mountain Lions / Indemnity Fund / Southern California-Central Coast Evolutionarily Significant Unit (ESU) of Mountain Lions / Endangered Species Act (Council File: 20-0002-S20) – Support

Dear City of Los Angeles Councilmembers:

As the authors of the [Petition](#) to List the Southern California/Central Coast Evolutionarily Significant Unit (ESU) of Mountain Lions as Threatened under the California Endangered Species Act (CESA), we strongly support the above-referenced resolution. Eliminating the use of lethal depredation permits and advancing the Southern California and Central Coast mountain lions to candidacy under CESA would help give the highly imperiled mountain lions in the Santa Monica Mountains and surrounding ranges a fighting chance for long-term survival.

I. Background on the Center.

The Center for Biological Diversity (“Center”) is a non-profit, public interest environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has over 1.7 million members and online activists throughout California and the United States. The Center and its members have worked for many years to protect imperiled plants and wildlife, open space, air and water quality, and overall quality of life for people in Los Angeles County.

II. There is Strong Scientific Evidence that Southern California and Central Coast Mountain Lions are at an Increased Risk of Extinction

Extensive research indicates that existing highway and development networks have separated the state’s mountain lion population into multiple isolated populations, which has led to high levels of inbreeding and poor genetic health (Ernest et al. 2014; Riley et al. 2014; Vickers et al. 2015; Gustafson et al. 2018; Benson et al. 2019). Low genetic diversity combined with high human-caused mortalities (*e.g.*, from car strikes, depredation kills, rodenticide poisoning, and poaching) threaten the long-term survival of several populations, particularly smaller populations in Southern California and along the Central Coast.

According to Gustafson et al. (2018), mountain lions in the Santa Ana and Santa Monica mountains have the lowest genetic diversity of any mountain lion populations in the U.S., aside from endangered Florida panthers. Lack of connectivity is the primary driver of these populations' demise. If nothing is done to improve connectivity and reduce human-caused mortalities, these populations could become extinct within 50 years (Benson et al. 2019). Mountain lions in the Santa Cruz Mountains are showing similar trends of genetic isolation and inbreeding (Gustafson et al. 2018; Saremi et al. 2019).

Moreover, Gustafson et al. (2018) found that mountain lions in the San Gabriel and San Bernardino mountains exhibit low genetic diversity and effective population size. The long-term survival of these mountain lions, along with those in the Tehachapi and Sierra Pelona Mountains, are vital for contiguous genetic connectivity between northern, southern, and central populations of California.

It is clear that current land-use planning and practices are driving Southern California and Central mountain lions towards local extinction. Protecting these populations under CESA and ending the issuance of lethal depredation permits is a critical step towards their recovery and long-term survival.

III. Lethal Removal of Mountain Lions Could Lead to More Conflict and Depredation Issues.

Lethal removal of mountain lions through hunting and indiscriminate control has been shown to lead to increases of 36 to 240% in nuisance complaints and livestock depredation events (Peebles et al. 2013). And Lambert et al. (2006) found that despite increases in reported conflicts in the Pacific Northwest, the mountain lion population in the region appears to be declining due to high hunting pressure. Thus, heavy poaching or lethal removal of mountain lions under depredation permits will not necessarily reduce conflicts or depredation events, and such management strategies could lead to population declines.

The removal of territory-holding adults disrupts the social structure of resident mountain lions by changing the sex and age structure of the local population as well as how the individuals use the available space (Peebles et al. 2013). Newly vacant territories can lead to a temporary increase in the local mountain lion population as multiple young, dispersal-aged males immigrate and compete for the territory until residency of a single individual is established (Lambert et al. 2006; Kertson et al. 2011). These young males are more likely to come into conflict with people (Peebles et al. 2013). In fact, most livestock depredation events in California are attributed to males (Torres et al. 1996), and disproportionately higher numbers of males are reported killed under depredation permits in California (Vickers et al. 2015; CDFW 2018). This indicates that a lethal depredation policy could actually exacerbate human-mountain lion conflicts and livestock depredation issues.

IV. Non-lethal Deterrence Measures Should be Prioritized and Incentivized.

Humans have extended roads and development into mountain lion habitat with little to no regard of their movement needs or opportunistic hunting behaviors. The responsibility falls on landowners and livestock producers to appropriately manage their property in mountain lion

habitat. Non-lethal deterrence measures, such as keeping livestock in lion-proof enclosures at night or using flashing lights, have been shown to be effective tools that can minimize depredation events. Other situational best management practices could be developed and implemented to reduce conflicts. The state should incentivize and/or assist landowners and livestock producers to implement effective non-lethal deterrence measures to the maximum extent feasible to minimize conflicts with mountain lions (and other native carnivores).

V. There is Widespread Support for the Resolution.

There is widespread support for proactive protections for these mountain lions. On February 17, 2020, the Center submitted a letter signed by 46 local, state, and national groups to the California Fish and Game Commission urging them to initiate a full status review and advance Southern California and Central Coast mountain lions to candidacy under CESA (see Exhibit A). On February 14, 2020, Social Compassion in Legislation submitted a separate letter signed by 38 groups to Governor Newsom calling for a moratorium on lethal depredation permits for mountain lions as well as supporting listing mountain lions under CESA (see Exhibit B). In addition, on February 25, 2020 Ventura County passed a similar resolution supporting CESA protections and ending the issuance of lethal depredation permits.

VI. Conclusion

Thank you, Councilmembers Paul Koretz, David Ryu, and Bob Blumenfield, for your leadership in addressing the conservation of mountain lions. And thank you for the opportunity to submit comments on this important resolution.

Sincerely,



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Exhibit A



February 17, 2020

Mr. Eric Sklar, President
 California Fish and Game Commission
 1416 Ninth Street, Suite 1320
 Sacramento, CA 95814

Submitted via email to fgc@fgc.ca.gov and USPS

RE: Petition to list Southern California and Central Coast mountain lions as threatened under the California Endangered Species Act – support advancement to candidacy

Dear President Sklar and Commissioners:

Thank you for the opportunity to provide comments on the petition to list Southern California and Central Coast mountain lions as threatened under the California Endangered Species Act (CESA).

The undersigned organizations, which represent millions of supporters throughout California, strongly support the protection of mountain lions in Southern California and along the Central Coast. We urge the Commission to initiate a full status review and advance the mountain lion populations in the entire area of the proposed evolutionarily significant unit (ESU) to candidacy.

Researchers have shown that our state's mountain lions are being profoundly impacted by human activity, most notably from habitat loss and fragmentation due to roads and development¹. Scientists have described an "extinction vortex" of genetic isolation, car strikes, depredation kills, rodenticide poisonings, poaching, disease, and larger and more frequent wildfires that could drive the Santa Ana and Santa Monica mountains populations to extinction within 50 years or less². Other populations within the proposed ESU, including those in the Santa Cruz, San Gabriel, and San Bernardino Mountains, are showing similar patterns¹. Protections under CESA that would improve habitat connectivity throughout the entire proposed ESU area are needed to ensure these magnificent big cats continue to inhabit these landscapes and inspire future generations.

Protecting mountain lions would have a positive effect not only for the species itself, but also for threatened and endangered wildlife and plants that are the cornerstone of California's unique biodiversity. The presence of this wide-ranging top predator has been shown to help maintain diverse habitats that support a multitude of fish, amphibian, reptile, bird, mammal, insect, and invertebrate species. And mountain lion kills provide an important source of food for numerous scavengers and opportunists. Loss of the species could potentially lead to degraded ecosystems and decreased biodiversity.

Affording protections to mountain lions would also benefit public health and safety. About 100 mountain lions are killed on California roads every year, and thousands of collisions with large mammals (mostly deer) are reported to state agencies and insurance companies annually. Protecting mountain lions by facilitating their safe passage over roads would improve gene flow among isolated populations and allow for the safer passage of many other animals, like deer, which would help to reduce wildlife vehicle collisions.

The well-being of mountain lions is linked with ecosystem function and public health and safety, but the species is now facing unprecedented threats to its long-term survival in several

¹ Gustafson, K.D., Gagne, R.B., Vickers, T.W., Riley, S.P., Wilmers, C.C., Bleich, V.C., Pierce, B.M., Kenyon, M., Drazenovich, T.L., Sikich, J.A. and Boyce, W.M., 2018. Genetic source-sink dynamics among naturally structured and anthropogenically fragmented puma populations. *Conservation Genetics*, 20(2), pp.215-227.

² Benson, J.F., Mahoney, P.J., Vickers, T.W., Sikich, J.A., Beier, P., Riley, S.P., Ernest, H.B. and Boyce, W.M., 2019. Extinction vortex dynamics of top predators isolated by urbanization. *Ecological Applications*, 29(3), p.e01868.

parts of the state. We therefore strongly recommend the California Fish and Game Commission to initiate a full status review and advance Southern California and Central Coast mountain lions to candidacy.

Sincerely,

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Exhibit B

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SCIL
Social Compassion
in Legislation

February 14, 2020

For Immediate Release



THIRTY-EIGHT GROUPS SEND LETTER TO GOVERNOR NEWSOM URGING A MORATORIUM ON LETHAL DEPREDAATION PERMITS FOR MOUNTAIN LIONS

Request for moratorium on all mountain lion lethal depredation permits and lethal anticoagulant

*rodenticides in Southern & Central Coast California
mountain ranges*

Dear Governor Newsom:

We write today to urge you to put an immediate moratorium on all lethal depredation permits for mountain lions, as well as six fatal rodenticides in the Southern California and Central Coast mountain ranges. Mountain lions in these regions are threatened with extinction. The recent death of the mountain lion known as P-56 in the Santa Monica mountains at the hands of a rancher who received a lethal [depredation permit](#) from your administration's Department of Fish and Wildlife is a horrifying example of how we are prioritizing privately owned livestock over the wildlife that all Californians cherish, as echoed by the [Los Angeles City Council Resolution](#). There is no justification for killing P-56, who was part of an 18-year national park study and whose death now leaves **only one breeding male lion in that range**.

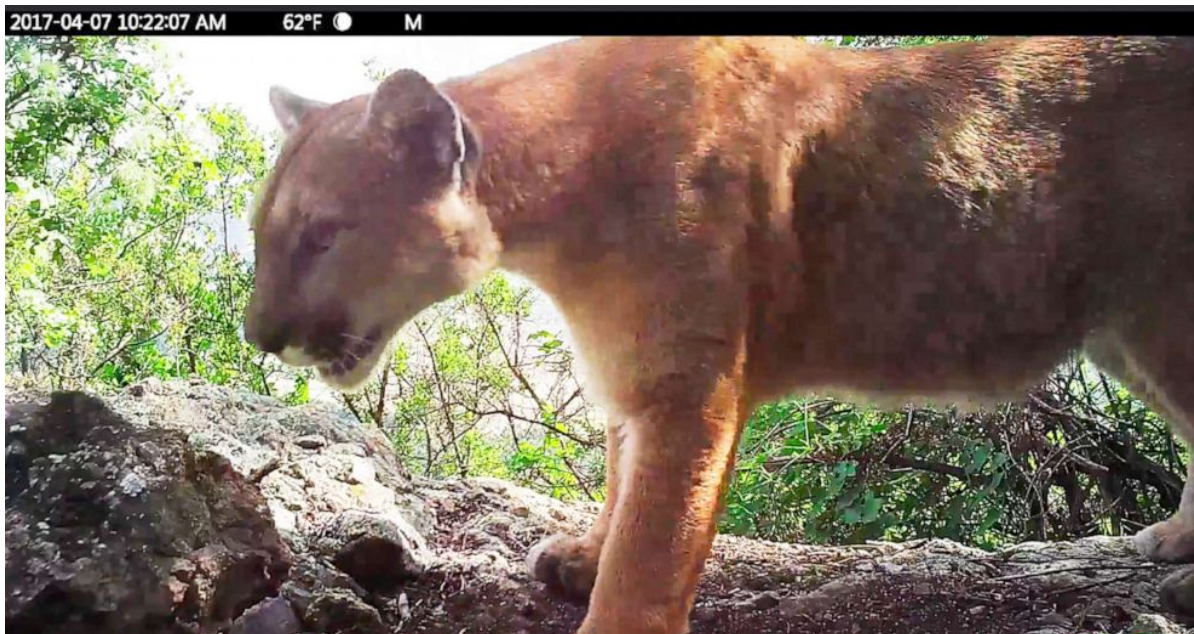
Lions in these areas are imperiled partly due to loss of habitat, and genetic isolation as a result of freeways and other barriers preventing connectivity. While we certainly support the necessary efforts at the local and state levels to solve those problems, action can be taken to relieve further pressure on these mountain lion populations.

We request your office take immediate action to require the Department of Pesticide Regulation (DPR) to place a moratorium on anticoagulant rodenticides: brodifacoum, bromadiolone, difethialone, difenacoum, chlorophacinone and diphacinone by suspending those products. DPR has already recognized that these rodenticides are harming mountain lions and have "population-level impacts among non-target wildlife."

Lastly, we understand that the Department is currently reviewing a petition to list mountain lions in the Southern California and Central Coast regions on the California Endangered Species Act (CESA), which will undergo an initial vote at the April 15th-16th Fish and Game Commission meeting in Sacramento. We fully support listing mountain lions under CESA and believe such listing is imperative to their survival and hope that you will formally support such listing. **Yet, time is not on the side of mountain lions**

and not even one more death at the hands of a depredation permit or anticoagulant poisoning is acceptable.

We are grateful for your history of protecting California's wildlife. We hope you agree the above steps are necessary and will take immediate action. California's mountain lions are depending on you, and extinction is forever. Thank you for your time and consideration.



This April 7, 2017, photo from video released by the National Park Service shows P-56, a young male mountain lion that roams the western end of the Santa Monica Mountains in Southern California. National Park Service via AP

Thank you all for your support. Please help us to continue our life saving work for the animals. We exist by donations alone, please donate today!

**Deepest appreciation,
Judie Mancuso, Founder/CEO/President
Social Compassion In Legislation**

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