Electronically Submitted
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California Fish and Game Commission
P.O. Box 944209
Sacramento, CA 94244

Re: Final Consideration of Petition to List the Southern California / Central Coast Mountain Lion Distinct Population Segment Under the California Endangered Species Act

Dear Commissioners:

California Farm Bureau Federation ("Farm Bureau") appreciates the opportunity to comment on the Commission's final consideration of whether to list the proposed Southern California / Central Coast mountain lion Distinct Population Segment ("DPS") under the California Endangered Species Act ("CESA").

California Farm Bureau is California's largest farm organization, comprised of 54 county Farm Bureaus currently representing approximately 28,000 agricultural, associate, and collegiate members in 57 counties. Farm Bureau strives to protect and improve the ability of farmers, ranchers, and foresters engaged in production agriculture to provide a reliable, safe, and affordable supply of food and fiber through responsible stewardship of our natural resources.

Farm Bureau members live and work in the areas most directly affected by mountain lion presence, depredation incidents, and the increasing human–lion interactions documented in recent years. Based on the Department's Status Review, public-safety data, and the lived experience of agricultural producers, Farm Bureau, and the undersigned County Farm Bureaus, opposes the proposed listing. In the alternative, if the Commission chooses to proceed, any listing must be strictly limited to the originally petitioned geographic area.

The Population Estimate in the Status Review Is Too Uncertain to Support a Threatened Listing

The Department's population estimate is not sufficiently reliable to justify a threatened listing under CESA. The Status Review estimates there are approximately 4,172 mountain lions statewide, but the Department also acknowledges that the true number could be as low as 3,645 or as high as 4,750. (Status Review, Exec. Summary, p. viii.) This swing of more than 1,000 mountain lions shows how uncertain the estimate really is. The same level of uncertainty appears within the petitioned region, where the Department estimates 1,449 individuals but concedes that the true number could fall anywhere between 1,272 and 1,638. (*Id.*)

The Status Review confirms that these estimates rely on a relatively new scat-based spatial capture–recapture ("SCR") model (Status Review, pp. 22–24, 25-27), which is sensitive to uneven sampling effort, detection probability, and terrain. The Review specifically cautions against interpreting these model outputs as evidence of population decline. (Status Review, p. 39.) Earlier statewide estimates, including those from 1989, fall within or above the Department's current numbers (Status Review, pp. 22–24), undermining any suggestion that the DPS is trending toward endangerment.

The Commission Must Not Expand the Listing Area Beyond the Petitioned Boundary

CESA is a petition-driven statute, and the Commission's authority is limited to evaluating the geographic area defined in the petition itself. To the extent the Department's Status Review removes certain areas such as the southeastern desert regions and intensively farmed Central Valley lands those removals are appropriate and consistent with the Review's findings on habitat suitability and genetic data. (Status Review, pp. 84–85.)

However, the Department also proposes expanded boundaries that extend beyond the petitioned ESU. The Review admits the proposed DPS boundary is "modified from the ESU boundary proposed in the petition" (Status Review, p. 73) and merely "largely coincides" with the petitioned area. (Status Review, Exec. Summary, p. ix) These descriptions mask material expansions into regions never identified in the petition or evaluated during the candidacy period.

The Department's alternative boundary route following Highway 14, Highway 138, Highway 18, Highway 62, Joshua Tree National Park, I-10, and Highway 86 pulls in new communities and agricultural landscapes without statutory notice or procedural safeguards. (Status Review, pp. 84–85.) These expansions violate CESA's requirement that the Commission evaluate the petitioned action, not create a new listing proposal at the eleventh hour.

Moreover, the Status Review concedes that several newly included regions lack adequate genetic sampling and that lion population membership "cannot be determined" based on the available data. (Status Review, p. 102.) Expanding a DPS of this magnitude based on unverified assumptions is scientifically and procedurally inappropriate.

For these reasons, while Farm Bureau does not oppose the removal of areas lacking habitat or biological support, the Commission must ensure that no new areas are added and that any listing is confined strictly to the originally petitioned geography.

Prey Declines, Not Extinction Risk, Are Driving Dangerous Increases in Human–Lion Conflict

The Status Review confirms that deer make up roughly 70 percent of a mountain lion's diet within the DPS. (Status Review, p. 7.) At the same time, multiple deer populations in Southern California and the Central Coast have undergone documented declines due to drought, wildfire, and habitat fragmentation. (Status Review, pp. 44, 47–50.) As lions lose access to their primary

food source, they increasingly turn to livestock, pets, and even people. These conflicts arise not because the mountain lion is nearing, extinction, but because prey shortages are pushing lions into human-inhabited areas. Without stabilizing prey populations, conflict pressure will continue to rise regardless of listing status.

In August 2025, a Central Coast farm lost 15 alpacas in a single night when multiple mountain lions breached the property and killed the animals. (SF Gate, *15 alpacas dead, 3 cougars on the loose: NorCal ranch under siege*, August 22, 2025.) The scale of the attack demonstrates both the growing boldness of lions searching for food and the inability of traditional deterrents to prevent mass depredation events when natural prey is depleted.

In another incident, an 11-year-old girl was attacked in her own yard in Malibu after a lion approached the child in the backyard. (ABC7 News, *Mountain lion attacks 11-year-old girl in backyard of Malibu home*, August 11, 2025.) This is precisely the type of preventable encounter that becomes more likely when hungry lions shift into residential areas.

Similarly, in March 2024, a California hiker was killed by a mountain lion in El Dorado County while walking with his family. (NBC News, *Mountain lion that killed man and injured his brother is euthanized in California*, March 23, 2024.) This tragic fatality is a stark reminder that mountain lion conflicts pose genuine risks to human life especially in regions where prey shortages push lions into closer proximity with people.

Beyond these severe incidents, numerous documented encounters have involved lions entering neighborhoods, approaching schools, stalking pets, and roaming near barns, equestrian facilities, and rural homes. These conflicts arise because the State has failed to manage prey populations, forcing lions to seek food wherever they can find it.

These cases illustrate a clear and troubling pattern: prey scarcity is driving dangerous lion behavior, increasing the likelihood of attacks on livestock, pets, and people. A CESA listing will not improve this situation. Instead, it will restrict the very tools that landowners and public-safety officials rely upon to protect the public during high-risk encounters. Until the State meaningfully addresses declining deer herds, habitat fragmentation, and the resulting ecological imbalance, listing the mountain lion will worsen, not alleviate, these threats to both rural communities and the lions themselves.

The Five-Year Delay in Completing the Status Review Undermines Any Assertion of Immediate Threat

The petition to list this DPS was submitted in 2019 and accepted for candidacy in April 2020. The Department did not complete its Status Review until December 2025, after a five-year delay. (Status Review, Petition History, pp. 1–3.) During that entire period, the species remained in candidate status, and no emergency regulations, emergency closures, or interim conservation measures were undertaken by the Department.

If the mountain lion DPS were truly at risk of imminent extinction, the Department would not wait five years without acting. The Legislature designed CESA as a protective, rapid-response

framework for species at genuine risk. A delay of this length is inconsistent with any claim that conditions are deteriorating rapidly or that the DPS faces an urgent threat requiring immediate listing.

Moreover, the record shows no significant new information or new decline during the five-year period that would justify a sudden shift from prolonged inaction to urgent listing. The Department's own Status Review acknowledges that the new population estimates "should not be interpreted to mean the population has declined since 1989." (Status Review, p. viii.) Habitat conditions, prey availability, and connectivity concerns cited in the petition have existed for decades and were not triggered or materially worsened during the time the Department took to complete its analysis.

The unexplained delay also creates practical and procedural concerns. Communities, landowners, and counties within the petitioned geography have been required to operate for half a decade under the uncertainty of candidate status. The Department's decision to wait until 2025 to finalize its review despite no statutory requirement to do so suggests a lack of immediacy inconsistent with the heightened protections sought at this stage.

A CESA Listing Will Increase Depredation Conflicts and Create Public-Safety Risks

Depredation and human–lion conflicts are already a leading source of mountain lion mortality and a major concern for rural communities. The Status Review notes that human–wildlife conflict has "profound impacts on the conservation and management of the species" (Status Review, p. 32) and documents 3,637 reported mountain lion incidents between 2010 and 2020. (*Id*. at p. 33.) These include depredations, public-safety concerns, nuisance interactions, and repeated sightings near homes, barns, and schools.

Depredation reports have trended upward for nearly 50 years (Status Review, p. 33) with sheep and goats accounting for 59.4 percent of confirmed depredations, large livestock for 13.1 percent, and pets for 10.4 percent. (*Id*.) These data demonstrate that agricultural operations and the rural families who live on them bear the brunt of conflict pressure.

Meanwhile, the State has significantly narrowed available response tools. In 2020, CDFW expanded its non-lethal-first policy to the entire state, restricting lethal authority even in repeated predation scenarios. (*Id*.) Additionally, depredation permits are limited to one mountain lion per incident regardless of how many lions participate in attacks. (*Id*.)

The Status Review itself recognizes that it is "unlikely that the number of conflicts will decline" going forward. (*Id*. at p. 39.) Yet a CESA listing will impose the strict take prohibitions of Fish and Game Code section 2080, further constraining the State's ability to act swiftly when lions kill livestock, return repeatedly to the same property, or enter residential areas.

The result is a dangerous and foreseeable outcome: more lions entering agricultural and residential areas, more livestock losses, more high-risk encounters near homes and schools, and fewer tools available to address escalating threats.

Conclusion

CFBF respectfully urges the Commission to decline to list the Southern California / Central Coast mountain lion DPS under CESA. The Status Review presents highly uncertain population estimates, scientifically unsupported boundary expansions, clear evidence of prey-driven conflict, and a five-year administrative delay fundamentally at odds with any claim of immediate or worsening extinction risk.

Moreover, a CESA listing would increase conflict by removing essential management tools, even as the Department's own data show rising depredations, thousands of reported incidents, and no expectation that conflicts will decline. Without addressing prey availability, habitat fragmentation, and the Department's limited ability to respond to dangerous situations, listing the mountain lion will exacerbate not alleviate risks to rural communities, livestock, and the lions themselves.

If the Commission nevertheless proceeds, any listing must be strictly confined to the originally petitioned boundary.

CFBF appreciates your consideration and remains committed to working collaboratively on wildlife-management strategies that protect public safety, support agricultural communities, and ensure long-term ecological balance.

Respectfully submitted,

Steven Fenaroli
California Farm Bureau