

# MOUNTAIN LION FOUNDATION

## *Saving America's Lion*<sup>TM</sup>

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June 18, 2010

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Wyoming Game & Fish Department  
Wildlife Division  
Attn: Regulations  
3030 Energy Lane  
Casper, Wy 82604

*Executive Director*  
Timothy Dunbar

RE: Proposed 2010 Mountain Lion Quota Changes

Position: OPPOSED

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Dear Sirs,

The Mountain Lion Foundation opposes the proposed changes to Wyoming's 2010 mountain lion hunting regulations and respectfully requests that the Wyoming Game and Fish Commission consider the ramifications of their actions on the health and sustainability of Wyoming's mountain lion population, especially in connection with the hunting policies and practices of South Dakota in the Black Hills region.

We believe that insufficient consideration of the following points will adversely affect mountain lions as a species in Wyoming as well as in adjacent states.

#### Population Estimates & Evaluation of Quota/Harvest Numbers

In Wyoming's 2006 Mountain Lion Management Plan, the Wyoming Game and Fish Department (WGFD) practically boasts that mountain lion management in Wyoming has little to do with science and blames this fact on the secretive nature of the animal and the rugged terrain it typically inhabits. While this might just be literary hyperbole, the fact that WGFD refuses to assign an estimate as to how many lions reside in the state makes it difficult to properly ascertain whether the Department's adaptive management plan actually considers anything beyond the average number of days it takes for a lion hunter to acquire his/her trophy.

Coupled with the fact that annual harvest numbers regularly run about 40 percent lower than projected, and do not include the Department's own estimate of orphaned kitten mortalities, it is hard to declare that the Wyoming Game and Fish Department has sufficiently established reasonable parameters upon which to base their annual hunting proposals.

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### Ramifications of Removal of Female Mountain Lion Harvest Limits

During the five-year period (2001-2006) the Wyoming Game and Fish Department publicly posted female mountain lion mortality data; 44 percent of all lions reported killed were females. One of the arguments put forth in favor of hunting mountain lions with hounds is the potential for sex selection and the ability to reduce orphan kitten mortalities. Since over 90 percent of the mountain lions harvested annually in Wyoming are taken by hunting with hounds, the continually high percentage of reported female mountain lion mortalities does not demonstrate that much, if any, consideration is being given as to the sex of the animal killed.

Furthermore, female mountain lion mortality estimates are high enough to suggest an ongoing suppression of species. By removing even the few female quota limits which currently exist, there is the potential for even greater female mountain lion mortalities and a subsequent increase in abandoned kittens that will be unable to survive on their own.

### Taking Improper Actions to Assist Wyoming's Deer Herd for the Sake of Political Expediency

WGFD has indicated for years now that Wyoming's deer herds are stressed by poor habitat conditions and inadequate winter forage. These factors can only be addressed through proper habitat restoration projects such as the one being conducted near the town of Lander in Fremont County. Increasing the harvest of mountain lions as proposed in the 2010 Mountain Lion Hunting Regulations for the purpose of assisting in the recovery of Wyoming's deer herd is a misguided attempt to placate a small, but vocal special interest group and is unsupported by scientific data. WGFD's own experts have noted that removal of the deer's natural predator will not necessarily improve the size of the herd if the existing habitat conditions will not support a larger population base.

It is time for all western states to stop making mountain lions the scapegoat for the reduction in size of mule deer herds, and to establish reasonable deer hunting policies based on the actual population size of the species as it is today, and not on some hypothetical number it once was years ago. Until mule deer habitat is improved across the west, the number of mule deer will not substantially increase no matter how many mountain lions are killed.

### Black Hills Hunt Area

A review of 8-years of mountain lion hunting quota/harvest numbers for the Black Hills Hunting Area (HA-1) shows an ever increasing hunting quota and subsequent harvest of mountain lions.

In 2001, the mountain lion hunting quota and harvest for HA-1 was 5. By 2008 it was 16. During this eight-year period the cumulative mountain lion hunting quota for HA-1 totaled 92. This quota was actually exceeded by 3 additional mountain lion deaths.

The proposed 2010 mountain lion hunting quota for HA-1 further increases the potential harvest of mountain lions to 24. This is a 50 percent increase over the previous year's harvest, and based on recorded harvest results for HA-1, it is anticipated that even this excessively high mountain lion hunting quota will be met and possibly exceeded.

HA-1's high mountain lion mortality numbers, along with doubling the quota for HA-30 and listing HA-24 and HA-15 as unlimited mountain lion hunting areas, in affect creates a mortality

sink out of the northeastern portion of Wyoming. Such actions do not take into consideration the regional effects on mountain lions when combined with South Dakota's annual harvest of mountain lions in the same area. State lines are meaningless to mountain lions and it is irresponsible for WGFD to increase the hunting quota of mountain lions in a border hunting area without also taking into consideration the hunting policies and practices of adjacent states.

In conclusion, the Mountain Lion Foundation believes that the proposed changes in Wyoming's 2010 Mountain Lion Hunting Regulations will be detrimental to the species and cannot accomplish anything more than allowing a small number of hunters kill more lions.

Therefore, MLF encourages the Wyoming Game and Fish Commission to authorize WGFD to conduct extensive research to better establish the true status--number as well as health--of Wyoming's mountain lion population beyond that which is discernible from harvest data alone.

Also, the Mountain Lion Foundation formally requests that the Wyoming Game and Fish Commission reduce the overall mountain lion hunting quota for the 2010-11 hunting season, especially in the Black Hills Hunting Area, and reestablish female mountain lion mortality limits in an effort to reduce the adverse side affects of excessive kitten mortalities.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tim Dunbar', with a long horizontal line extending to the right.

Tim Dunbar  
Executive Director