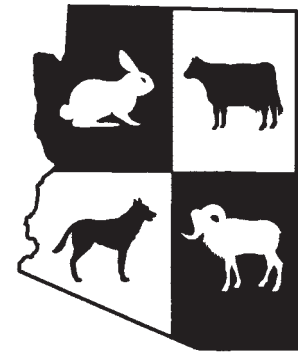


Selected comments of organizations and individuals on the Arizona Game & Fish Department's Bighorn Sheep/Mountain Lion Project

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ADLA
ANIMAL DEFENSE
LEAGUE of ARIZONA

Ms. Chris Hass, Ph.D., (bighorn sheep expert)
Borderlands Carnivore Studies

“Although puma predation on some radiocollared individuals was described (in the Environmental Assessment), the overall population graph showing an initial post-release increase then decline is common for introduced population (Buechner 1960, Woodgerd 1964, Hass 1989). The graph showing the ratio of lambs to ewes is typical for populations subject to disease and nutritional deficits — even in the absence of significant predation (Hass 1993). The coincident decline of mule deer in the area suggests that drought-related nutrition and disease may account for most of the observed decline in this population.”

“The study lacks spatial or temporal controls, making it difficult, if not impossible, to separate the factors of disease, nutrition, and predation. This is a fatal flaw in this study design. Because of the lack of controls and an unknown reduction (in lion numbers), it is not possibly (sic) to numerically related puma population density, or density reduction, to predation level on bighorn.”

“The use of dogs for puma hunting may have impacts on bighorns. Bighorns, particularly ewes with lambs, are extremely fearful of canids. The sight or sound of a pack of dogs in pursuit of a puma may panic the bighorns, resulting in injury or death.”

“The information provided in this EA does not conclusively support predation as a factor in the population decline. AGFD could learn far more with less cost and controversy if they carried out a detailed study of disease, nutrition, and mortality without the puma reduction component. This poorly designed research proposal represents a major step backward for Wildlife Management; the only reasonable alternative is the No Action alternative.”

Mr. Harley Shaw (mountain lion expert and long-time research biologist with the AZ Game and Fish Department)

“...the project is a disaster. First of all, it is obviously not research but rather a poorly disguised ploy to bypass the state law against trapping of pumas on government lands. Game and Fish has some good scientists. They must be pulling their hair over this silliness. I pity the biologist who will be forced to waste 5 years of his professional life on the project.”

“Pretty obviously, this is just one more politically motivated “study.” The sheep society ... has put enough pressure on G&F to create yet another issue-oriented project that will yield no clear result.”

“I hate to see the department jumping into poorly designed projects. I fought it throughout my career in the agency, and though we had begun to make some progress. This study is a great step backward. I hate even more to see G&F caught up in mendacious behavior that supports a small interest group at the risk of offending the intelligence of a larger public. Once more your credibility will suffer.”

Mr. Steve Gallizioli (long-time research biologist and Research Division Chief with the AZ Game and Fish Dept.)

“...I feel compelled to express some grave doubts about virtually every aspect of this project. My background in wildlife research leads me to wonder why such a lion study was even proposed. I seriously doubt that any substantive findings useful to the Department’s Wildlife Managers will come from this effort.”

The Phoenix Zoo (comments prepared by Mr. Mike Seidman, Conservation Coordinator)

“The 75% reduction, moreover, will serve to confound the ‘experiment’ (i.e. the attempt to understand the role of lions in the steady reduction in bighorn numbers), as bighorn predation by lions might increase significantly as a result of control action (i.e. from a steady inflow of immigrating lions) creating the very problem their removal was meant to address.”

“An unwillingness to look at the situation in terms of the dynamics of the natural landscape is the greatest flaw in this proposal. While it’s true that the Department plans to investigate a few other variables — diseases from domestic sheep, nutrition and habitat quality — these will be studied only in relationship to bighorn sheep. Even when the EA acknowledges the possibility that reducing lions will increase populations of smaller carnivores, it sees this only in terms of effects on bighorn sheep. Are there no other animals out there affecting or being affected by the situation (e.g. in terms of predation, competition or disease), no ecological processes or disturbances, no changes in the ecosystem from climatic or anthropogenic impacts that might be important factors? The EA gives no hint that the Department is interested in any of these inter-relationships. Instead of thoroughly investigating the links in the chain, the myriad factors effecting bighorn sheep and lions (and other species), the Department is intent on removing one link, the predator, as if that will help understand or break the chain of factors effecting Unit 22 bighorn sheep. **This is not research but predator control.”**

“It has not been established that lions are predating on significant numbers of bighorn sheep throughout the Unit. Most of the evidence comes from one area that is better lion than bighorn habitat. The decline of the Unit 22 herd may be explained by declining habitat quality, perhaps accentuated by a herd that expanded beyond carrying capacity, by disease resulting from stress and from dispersal into an area of poor quality habitat adjacent to a sheep driveway. Lion predation, to the extent it is a factor at all, may only be keeping the herd within the carrying capacity of the habitat.”

Sierra Club — Grand Canyon Chapter (comments prepared by Ms. Sandy Bahr, Conservation Outreach Director)

“The proposed project does (not) represent a valid experiment for many reasons including the fact that it lacks any control and has too many variables. It is also clear that there is no reliable baseline data to measure management actions against, including how many mountain lions are actually in the area. There is also no mention of long-term monitoring and apparently no plans to include that. Without long-term monitoring, studies such as this will not provide reliable data. The influence of weather and drought on range quality is a huge factor and clearly impacts the carrying capacity of the area for sheep and other wildlife. The influence and competition of other wildlife such as mule deer on the forage and the influence of all predators, not just mountain lions, should be considered. The presence of domestic sheep must also be considered if the Department is to properly assess the cause of the decline in the bighorn population. **Focusing only on killing mountain lions is poor science at best and at worst more of the anti-predator bias that has caused so many problems in ecosystems throughout the world and here in the west for more than one hundred years.**”

“The Department and the U.S. Fish and Wildlife Service have failed to disclose and evaluate a number of issues critical to this matter. There is no analysis of the impact of the domestic sheep driveway in this area on the bighorn sheep or their habitat. There is no description of the bighorn/mountain lion habitat within the study area and whether this area might have habitat limitations for the bighorn. There is no information about the bighorn or mountain lion populations after 1998. There is also no consideration of the precedent of this study to future Department predator management plans and practices, and there is no explanation as to how killing 75 % of the mountain lion population will impact the ecology of the area.”

“This proposal is not scientifically justified or needed. Predators, including mountain lions, play an important role in ecosystems; it is time for the Department to recognize and respect that. For all the reasons stated in this letter and more, we support Alternative 2 — the no action alternative — that will prevent this unnecessary and wasteful killing of mountain lions.”

Defenders of Wildlife — Southwest Office

“Instead of making a scientifically sound effort to identify possible causes of bighorn population decline within the study area, this experiment reflects a continuing anti-predator bias within the Game and Fish Department and Commission. This is an outdate management practice that favors managing for one species over another, instead of using ecosystem-based management to try and address the declining bighorn population.”

Center for Biological Diversity

“The glaring issue that remains unaddressed by this proposal is the sheep driveway through the Tonto NF (National Forest). Disease transmission from domestic sheep is well established to be a major problem for bighorns... Our information is that the sheep driveway in (sic) entirely pointless. The driveway permittees had even been offered free trucking between winter and summer pastures by a third part, and they refused to take the offer, clearing (sic) indicating that the issue was not economic but a matter of “lifestyle” preference. The agencies should prevail upon Tonto National Forest to cancel the driveway, as there is no rational justification for its continuance when trucking is available.”

Steve Pavlik (hunter)

“What really amazes me is that Arizona Game and Fish would even attempt to “pull off” such (a) controversial project. You must know that we live in a time period in which a proactive public watches every move that you make. It is projects like this that convinces the public that you lack the ability to manage wildlife on your own. It is projects like this that convinces the public that you are “in the pockets” of special interest groups such as the Desert Bighorn Sheep Society.”

“I doubt if the people of Arizona will accept the needless slaughter of so many mountain lions —nor should they. The day is long past when agencies, claiming to be the “experts,” can kill lions and other predators indiscriminately. It was exactly because of cases like this that the voters overwhelmingly rejected Proposition 102 — the so-called “super majority” initiative. I predict that if the Game and Fish Department approves this proposal there will be a backlash — quite possibly in the form of an initiative such as California’s Proposition 117 that will seek to ban lion hunting. If this happens, Arizona Game and Fish will have no one to blame but themselves. In sum, the only thing this proposal will accomplish will be to provide the animal rights people and the anti-hunters with ammunition to use against us.”

“...take this opportunity to show the people of Arizona that you are truly professionals who can be trusted to care for the wildlife of the state. Show the public that you are sensitive to their desires, and that more importantly, you will manage wildlife based on the best science available, not on political motivations.”

Mr. J. Steven Smith (mountain lion hunter)

“The basic design of this study is flawed because AGFD has asked too many questions. All questions asked were pertinent; however, when the study is completed it will be unclear which element had detrimental effects.”

“When this project started I request (that) the AGFD address disease. Disease was then publicly stated as the problem, due to the transfer from domestic to wild sheep on the driveway. This is obviously a real possibility and concern.”

“I believe, because of twenty-five years of experience lion hunting on the Salt River chain, that there is a fluctuating density in lion populations. During the lamb drop, there could very easily be twenty-five adult lions in the project area. If these numbers were recognized by the EA then only 20-28% (compared to 75 percent proposed by the AGFD) of the lion population would need to be removed.”