



MOUNTAIN LION FOUNDATION

Saving America's Lion

June 11, 2012

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Wyoming Game and Fish Department
Comments on Regulations CHAPTER 42, Mtn. Lion Seasons
3030 Energy Lane
Casper, Wy 82604

RE: Proposed 2012 Black Hills Mountain Lion Hunting Changes

Position: **OPPOSED**

Dear Sirs,

On behalf of our Wyoming-based members, the Mountain Lion Foundation opposes the proposed changes to the mountain lion hunting quotas and season lengths for Wyoming's Black Hills region 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.

Wyoming Lion Population Estimate

As of date, Wyoming does not have a peer-reviewed lion population model that is available for public access or comment. Without such a document--and the research necessary to create one--any decision that could increase the number of lions killed annually within the state is a gross violation of the public trust doctrine under which the Wyoming Game and Fish Department (WGFD) is supposed to manage Wyoming's wildlife.

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.

Black Hills Hunt Area

A review of mountain lion hunting quotas and 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.

In 2010, the mountain lion hunting quota for HA-1 increased 50 percent over the previous year's harvest to 24. At the same time HA-30 had a mountain lion hunting quota of 16. In both hunt areas not only was the relatively high mortality quota reached, but once again exceeded.

To now take the same geographic region and carve out an unlimited lion hunt area just because some ranchers have complained that the hunt quotas are reached too soon by hunters on public lands is the height of either folly or willful negligence on the part of wildlife managers.

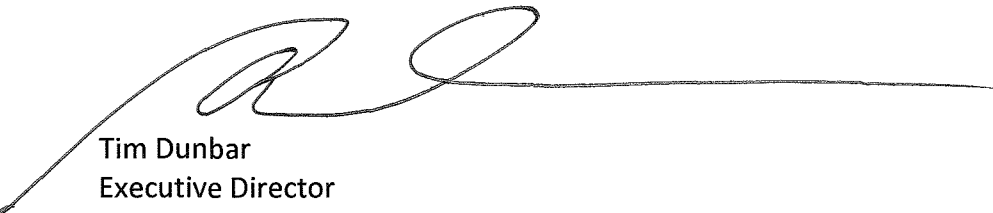
Wyoming's northeastern hunting region has become a mortality sink for mountain lions. And when combined with South Dakota's annual harvest of mountain lions in the same area the affects on the region's lion population are devastating. State lines are meaningless to mountain lions and it is irresponsible for WGFD to increase the hunting quota of mountain lions in a border hunting area.

In conclusion, the Mountain Lion Foundation believes that the proposed lion hunting quota changes will be detrimental to the species and cannot accomplish anything more than allowing a small number of ranchers to get rich off of killing 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 the Black Hills Hunting Area until such time that the Department can prove that its management decisions do not have an adverse effect on the region's lion population.

Sincerely,



Tim Dunbar
Executive Director