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June 22, 2010

Mr. Steve Ferrell, Director
Wyoming Game and Fish Department
5400 Bishop Blvd.
Cheyenne, WY 82006

Dear WYG&F Commissioners,

On behalf of the Cougar Fund and our members, we present these comments on the proposed changes to the mountain lion regulations - chapter 42. We appreciate the Wyoming Game and Fish Department's (WGFD) efforts to assemble public meetings across the state to discuss and take comments on the proposed regulations, but we do believe the Department should have ensured that personnel knowledgeable about the entire state and state objectives should have attended each meeting in addition to local game officers. From our review of the proposed changes and "Statement of Reason", The Cougar Fund would like to provide several recommendations and comments.

One of the Cougar Fund's main objectives is to balance human interests with healthy cougar and prey populations. With this focus in mind we conclude that the proposed changes to the mountain lion hunting season are unscientifically justified and not explained in any way by the Department in its "Statement of Reason".

First, the proposed change to the definition of "mortality" is lacking reason and justification. Counting all types of deaths towards the quota is essential because non-hunting related mortalities do contribute to cougar declines and actual population trends. Including all mortality is part of an adaptive and progressive management trend that is happening throughout the country. Already there are an unknown number of kittens that die inadvertently though hunting that are not taken into account when setting the quota. Factoring in all deaths appropriately implies a higher degree of accountability on the part of the public and the Department.

We are extremely concerned to see an exceptionally high quota increase in numerous hunt areas, as well as an open and unlimited season – specifically areas 22, 15, 27 and 24. To our knowledge the need for quota increases across the state is not supported by scientific data from the Department or independent field researchers in the state. Looking at the

history of cougar management through out the West, we have seen what happens when a population is over-hunted, which is why we must insist on seeing more scientific evidence and appropriate and applicable research to support a quota increase from the Department as soon as possible. Offering an “open season” can result in numerous possibilities for the population, which the Department will then have to manage for in a reactive, rather than proactive way. This lack of management can easily result in exploited populations, which can no longer be enjoyed by the public. In addition the landscape ecology will be greatly affected, possibly causing management issues with other species. Research conducted in states bordering Wyoming, such as Montana and Colorado has shown that heavily hunted cougar populations tend to be younger, have fewer males and take longer to recover from declines than once thought. To ensure healthy populations in the state, we would like to see statistical analysis and comprehensive peer review of the data the state has assessed.

One argument we were given for the increase in quotas was the number of depredation incidents in the Eastern part of the state. If this is truly the reasoning behind this proposed change, increasing hunting opportunities to reduce these “problem animals” may seem like the obvious answer. However modern and peer-reviewed published research tells game managers to take a different approach. The indiscriminate killing of cougars does not increase human safety or reduce depredation incidents; it may lead to a disproportionate number of juveniles in a population, which are often more involved in depredation incidents. High quotas and the designation of new hunt areas could have the effect of altering population demographics and thus possibly resulting in an increase in human/lion conflicts (Lambert et al. 2006). Indiscriminate killing decreases the ability for older experienced males to eliminate or kill off younger cats that the environment and habitat can't support. Increasing the quota manages for population, but does not manage for social interactions, which is one of the main issues in cougar management today.

We understand that depredation incidents can be extremely disturbing for any rancher or land-owner, which is why we believe the state should do everything in their power ensure that these incidents do not happen. Before the state compensates farmers and ranchers for depredation incidents caused by wildlife, the state ought to provide the tools and information to assist in the prevention of these problems. If farmers and ranchers don't take proper precautions, they should be fined, or at the very least not compensated for their loss. We suggest alternative management techniques such as appropriate land-use planning, improved animal husbandry and public education about living in cougar country. Additionally lawmakers should provide tax incentives to pay for fences and frightening devices, such as motion detectors and sirens. Laws should also punish irresponsible landowners who attract cougar problems through actions such as leaving an animal carcass in a pasture.

The Cougar Fund fails to understand the reasoning, or need behind a “reduced price mountain lion license”. Clearly the result is increased sport hunting opportunity for individuals. We have been told that offering this permit is a way to address the “public access” issue. We were unable to find any research supporting the theory that increasing hunting opportunity on public lands balances out the lack of opportunity on private lands. We would greatly appreciate clarification regarding this proposed change.

Lastly, we find efforts by the Department to remove female sub-quotas extremely detrimental to not only Wyoming's cougar population, but also to the Department's ability to manage cougars. This elimination of female sub-quotas was done, according to the Department, because it skews the harvest data. We believe the protection of females with kittens overrides the value of harvest data that already has many variables. Although regulations clearly state that a hunter may not take a female with kittens at side, it is important to note that mothers often leave their young in the den while they hunt. Why protect a kitten and mother when they are together, but not apart? What is the difference? Puma mothers are susceptible to harvest when their cubs do not accompany them. Research in Wyoming showed that during the winter hunting season, mothers were away from their cubs about 50% of the time that researchers with dogs encountered them (Logan 1983). More so, researchers studying pumas in Utah found that cub tracks were found with their mothers only 25% of the time; they concluded that 75% of mothers would not be recognized by hunters (Barnhurst and Linzey 1989). Since as many as three out four adult females may be raising cubs each year, it is possible that roughly 38% – 56% of adult females killed by hunters each year are mothers with dependent cubs." (Desert Puma, Logan and Sweanor, 2001). The Cougar Fund encourages female sub-quotas in all hunt areas to maintain viable populations and recruitment. Furthermore, female sub-quotas give hunters a reason to ascertain the sex of the cougar prior to a kill.

We hope that the state of Wyoming makes a commitment to using "adaptive management techniques" wherever possible. "Adaptive management" has been characterized by the continual monitoring of indicators that measure progress toward the achievement of management goals and objectives, changing of management practices when new information indicates that better alternatives are available, monitoring relevant stakeholder values and interests, and the monitoring of natural environmental changes that may affect cougar management results

If the state's reasons for proposing "quota increases", an "open season" and "no female sub-quota" are because cougars are seen as a threat to public safety, or threaten hunting opportunities for other species, we ask the Department to keep in mind that basing management strategies on peer-reviewed science and providing assistance and educational opportunities to the public would be a better alternative to the State falling victim to politics and spending valuable resources on a reactionary policy.

Thank you for considering these comments and the Cougar Fund is always available to answer questions or provide data.

Sincerely,

Sara L. Carlson
Director

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