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May 31<sup>st</sup> 2016

Dear Wyoming Game and Fish Department,

Please accept the comments of The Cougar Fund with regard to the 2016 Wyoming Mountain Lion Hunting Season review and recommendations.

We have attended two informational sessions conducted by the staff of the large carnivore division. These were the presentations held in northeast Wyoming (Sundance) and northwest Wyoming (Jackson).

We deliberately selected these sites to experience the diversity of your constituency, and the challenges and responsibilities facing your staff to address the different needs and perspectives of those interested in Wyoming's wildlife.

It was extremely informative to hear from the different stakeholders, especially to identify common ground issues.

### **Definitions**

There seems to be consensus, from all stakeholders, concerning support for the forward thinking changes that have been made to Chapter 42 § 2(c).

The clarification of the status of *female mountain lions with dependent young* is an enhanced protection that we support and express our appreciation for.

### **Regulations**

The greater protection of females with dependent young is echoed in Chapter 42 § 3(d), which we also support.



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## **Lactation Status**

We hope the new requirement that hunters provide anatomical evidence to support *lactation status of harvested females* (42 § 3(g)) will be utilized to further the scientific analysis that Wyoming Game and Fish Department (WGFD) biologists are able to conduct. We appreciate that lactation status provides greater confidence when categorizing the life cycle status of females (sub-adult/adult). We hope that data may be gathered to clarify the likelihood of collateral losses of very young kittens that are not yet able to travel with their mother. Those harvested females found to be actively lactating will provide information about *realistic rather than estimated collateral losses*. Such evidence will offer clear insight into frequency of orphaned kittens and be of significant interest to scientists, ethical hunters and advocacy organizations.

## **Hunt Areas, Season Dates and Limitations (42 § 3(j))**

We support reductions in harvest mortality limits in areas where WGFD has identified changes in the population structure that do not support existing limits. There are some areas that are of great concern to us and we respectfully suggest reducing harvest mortality limits further.

## **Hunt Area 2**

We recognize that you reduced the harvest mortality limit in hunt area 2 a number of times in the recent past. The harvest during the past three-year season has remained below 50% of the mortality limit of 5 animals. The department has recognized the presence of added pressure on mountain lions in this area. This is primarily due to the hunt area becoming a multi-predator system, but also includes current 'unknowns' about immigration, emigration, and disease. Long-term research has been conducted on the population in hunt area 2 by the Hornocker Institute, followed by the Wildlife Conservation Society, Craighead Beringia South, and finally, Panthera Puma Project (for the past four years). We ask that you reduce the mortality limit further, or to initiate a single female mortality to close the season. The past fifteen year commitment of time, money and departmental partnership is an encouraging sign of the importance of science to wildlife management.



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## Hunt Areas 3, 18,19, 20, 26, and 29

We know that these areas encompass seasonally dense populations of ungulates, both on wintering range that supports them independently, and on state-run feed-grounds. WGFD has recently developed a Chronic Wasting Disease Management plan (CWDMP), which has been accepted with great interest and concern by the Wyoming Game and Fish Commission (WGFC).

The latest map from 2015 indicates that active CWD occurrence is gradually expanding into the northwest.

<https://wgfd.wyo.gov/WGFD/media/content/PDF/Vet%20Services/Positives-by-Species.jpg>

In keeping with the CWDMP to “*consider the role of predators and scavengers to remove CWD infected animals and carcasses to reduce CWD transmission (Krum, 2010; Wild, 2011)*” we suggest that maintaining populations in the aforementioned hunt areas at maximum levels of social tolerance will help achieve the CWDMP’s objective.

The CWDMP also refers to the objectives of the Jackson Bison and Elk Management Plan (BEMP) and to WGFD’s commitment to work with National Elk Refuge (NER), Grand Teton National Park (GTNP), and United States Forest Service Bridger Teton National Forest (USFS-BTNF) to implement the plan.

The BEMP includes the following references to the value of predators in disease control.

The NER has already identified the risks of large concentrations of ungulates in the Bison and Elk Management Plan 2007 (Page 9 Purpose and Need) and also identified wolves and **cougars** as “*mainly killing the most vulnerable prey, the young, old and poorly conditioned*” (Page 142 Affected Environment BEMP). This pattern of predation is a tool to mitigate “increased risk of potentially major outbreaks of exotic diseases” (Page 9 Purpose and Need BEMP).



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Predators are known to reduce densities by dispersing prey, which also ties in with the statement “Some precautionary measures such as reducing densities and number of elk and increasing dispersion could reduce the chance of major adverse impacts if the disease (CWD) becomes established (Page 140, Affected Environment BEMP).

## **Area 2 Summary**

To summarize our comments for northwest Wyoming, we respectfully ask that the harvest mortality limit for Area 2, either be eliminated or reduced to the absolute minimum of two animals or one female. Please consider further conservative measures to ensure a large carnivore population in the northwest management area to help mitigate the effects of disease among the seasonally dense ungulate populations.

## **North East Management Area**

At the meeting in Sundance it was quite clear that the houndsmen are concerned that the harvest mortality limit is being met prematurely by the rapid, non-selective participation of out-of -state hunters. The average age of mountain lion mortalities in the area is decreasing. Since hunting is not an accurate random sample with which to project population growth, there is concern that the ratio of mature lions is on a downward trend. The Black Hills is a region that crosses state lines, state statutes, state cultures and attitudes, and is the most ‘roaded’ forest (providing exceptionally easy access for hunters) in the nation.

There is also concern about habitat loss due to deforestation by disease, which may have a deleterious effect on both predator and prey.

The best way to circumvent the differences among the states involved is to concentrate on the *biological information collected by their dedicated scientists*. Scientific exchange is not as politically-charged as attempts to attain regulatory uniformity. We encourage the professional biologists to share data with the objective of developing an accurate, scientific overview of the wildlife dynamics of the region and combining the resulting information *for the good of the lion population in the northeast*.



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## **Enhanced Conflict Prevention**

Conflict prevention is of great importance in the northeast where there is increasing 'ranchette'-type development with small-scale husbandry of goats and other domestic livestock, as well as large commercial livestock operations.

The last three-year mountain lion mortality report, published in April 2013 refers to the *"positive correlation with increased mountain lion harvest and increased amount of damage monies paid for compensation in regard to sheep depredation"* (Page 16) Thus it would be appropriate for the Department to concentrate on ways to encourage husbandry practices that reduce the possibility of conflict with mountain lions.

## **Sink Designation**

Please closely monitor the sink management of the northeast. There appears to be the possibility of excess pressure being applied to this population from sources other than hunting, a situation that requires conscientious monitoring and the willingness to pull back to 'stable' management.

## **Additional Education to protect kittens**

As stated earlier, we are very encouraged by your willingness to confirm the lactation status of female mountain lions that are harvested. The implication of collateral loss of kittens is of interest to many diverse stakeholders. Based on this common ground, we respectfully ask that you introduce a strategic informational campaign to make sure all hunters are aware of the possible consequences of their sport with regard to females and kittens. No ethical hunter wants to be part of orphaning kittens that are unable to survive. However, there is an influx of new hunters, and revenue-based outfitting opportunities for out-of-state hunters. The time constraints of an out-of-state visit, or the enthusiasm and lesser restraint of a 'new' hunter may result in less selectivity.



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The Mountain Lion Management Plan and the Wyoming mountain lion education program both refer to the risk of kitten losses. Please expand this outreach to include information with the receipt that is generated during online hunting application. A concise postcard that goes with every license could emphasize the important points: the unpredictability of mountain lion reproduction, the signs to look for when selecting an animal, and the ethics of not selecting postpartum females.

### **Timing of seasons**

The earliest part of the season (starting September 1st) is not typically when the houndsmen go hunting. The avid lion hunters rely on snow conditions for identifying tracks, to allow the dogs to scent and chase. The early start caters more to the 'back pocket hunters' referred to in the presentations. These are people who buy a mountain lion license for when they are hunting deer and elk in the fall. As opportunistic hunters, they want to be able to kill a lion legally if they come across one, but may not have adequate information or education about the unique birth cycles of the cougar. They are also boot hunters who do not have the same opportunity for selectivity and perhaps may be more responsible for kitten losses at this time of year, given the widely accepted likelihood of a summer birth pulse.

*Please consider a later start to the mountain lion hunting season to allow for greater selectivity, which may increase the survival rate of kittens.*

The new **definitions** go a long way to protect family units travelling together but still leave the most vulnerable, the newborn kittens unable to travel, at risk.

### **In Conclusion**

Thank you for your efforts to increase protection of females and family groups. Thank you for initiating the collection of lactation data that may put some **actual numbers on the incidence of collateral mortality**. While we, and others, can keep guessing, (high or low, depending on who is doing the guessing!) the data will provide a true statistical base to the ongoing and troublesome discussion of kitten mortality. We are confident that those invested in science-based management are equally eager to establish sound evidence of collateral losses.



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We value the positive communication that we have with Wyoming Game and Fish Department staff, and hope to continue this civil and constructive interaction going forward.

Thank you for accepting these comments in the respectful and positive manner in which they are being submitted.

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