

Arizona Game and Fish Department
Attention: Unit 22 Environmental Assessment – WMHB
2222 West Greenway Road
Phoenix, Arizona 85023

August 1, 2001

Comments on the Goat-Stewart Mountain Desert Bighorn Sheep- Mountain Lion Draft Environmental Assessment

To Whom It May Concern;

I have just completed reading the Draft Environmental Assessment (EA) of the Study to Investigate Causes of the Declining Population of Desert Bighorn Sheep in the Goat-Stewart Mountain Complex. Let me state from the onset that you can count me among the many who will oppose this poorly designed and ill-advised project.

I am an environmentalist with a deep interest in wildlife management. I am also a hunter. Certainly, I am not a sheep biologist, but I do know a little about mountain lions. Consequently, I will limit most of my comments to that species.

First of all, no one really knows how many lions there are in the Goat-Stewart Mountain complex and adjacent lands. So initially I question how you came up with the figure of 16 animals in the study area. You claim to arrive at this number based on average “local” and “statewide densities.” Still, this shows a decided lack of knowledge, and more importantly, a lack of wanting to know more about lion populations in the proposed study area. Obviously this project is about protecting sheep and the lions themselves are of little or no concern to you. More to the point, I question the wisdom of removing 75% of the lion population, or 12 animals. Your own figures in the EA quote various reports that say lion populations can withstand anywhere from 11% to 50% sustainable harvest. Common sense dictates that the removal of 75% of any species might adversely impact on the health of that wildlife population. But again, this research project is about sheep, not lions.

There is no mention in the EA as to the sex and age of the lions that will be taken. Since you do not have an accurate count of lions that inhabit the study area, I assume that you also know nothing about the sex and age structure of the lion population you are dealing with. Experience shows that when a male lion is removed from an area, another will simply move in and take his place. This means that you will have to concentrate your

“control” efforts on females – or continually kill males. Will you also kill females with kittens? In the EA you indicate that you will kill lactating females. Do you really believe this to be ethical? How will you deal with pregnant females? Will kittens and fetuses be included in the “magic number” of 12? Are we, in fact, looking at the indiscriminate slaughter of mountain lions?

The EA claims that track counts will be used to monitor lion densities as the project progresses – supposedly a “safe guard” against killing too many lions. I have had considerable experience using track counts to study mountain lions - in fact I am currently involved in three separate track count projects which focus on lions. Track counts are a good tool to determine the presence of lions and to provide a few observations about the general lion population. Track counts, however, will not provide you with any information regarding year to year population changes. This method simply isn't that sensitive.

As a historian the first thing I looked for in the EA was for the historical background of Desert bighorn sheep in the study area – there was none. Why wasn't the history done on this? Is someone trying to hide something? I did my own limited literature search and found that the number of references to sheep historically inhabiting the Goat-Steward Mountain region is extremely sparse. When this project (reintroduction) was first brought up over twenty years ago, Goat Mountain was low on the priority list. A number of prominent biologists advised against the reintroduction of sheep into Goat Mountain in 1980-81. This area was always considered to be “marginal” sheep country at best. Moreover, the area has long been recognized as being some of the best lion country in the state. Yet the Arizona Department of Game and Fish went ahead with the project anyway.

I understand that there are a number of factors besides lion depredation that might be causing a decline in sheep numbers, not the least of which is diseases that are transmitted from domestic sheep. Your EA acknowledges that a large percentage of the bighorns that have been captured possessed clinical signs of various diseases. The EA also recognizes the presence of a domestic sheep driveway in the study area – a potential source of these diseases. The EA claims that this possible factor will be investigated, but offers no hint as to how and when this will occur. In the meantime I guess it's easier to simply kill lions.

I also understand that the specific area in which the sheep have been reintroduced is also the area that has the poorest quality of deer habitat – and consequently fewer deer – than any other portion of the entire unit. It should have come as no surprise to anyone that the lions are eating your sheep. In sum, you have a problem of your own making.

I suspect that if you conduct this research project you will find exactly what you expect – and want – to find. I suspect that you will find that lion depredation is a major cause of sheep decline. What then? Do you go on killing 75% of the lion population in perpetuity? What purpose will this serve? To maintain what amounts to an artificial population of sheep to satisfy hunters and the Desert Bighorn Society? In the end, what will you have to show for your efforts? In reality this is not a research project, it is simply an excuse to kill lions.

As I stated at the beginning of this letter, I am not a biologist. So I took the liberty of contacting a number of people who are biologists, sheep and lion specialists specifically. I found that everyone was familiar with the Goat Mountain EA, and that everyone opposed it! I understand that the biologists who have spoken out against this project represent a virtual “who’s who” of the wildlife management profession – David E, Brown, Steve Gallizoli and Harley Shaw to name just a few. Yet the Arizona Game and Fish Department stubbornly plows forth with this ill-fated project. Why?

What really amazes me is that Arizona Game and Fish would even attempt to “pull off” such 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 do not believe that 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 a 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 that this proposal will accomplish will be to provide the animal rights people and the anti-hunters with ammunition to use against us.

I suggest that you take this lemon of a proposal and make lemonade out of it. Reject it completely. In fact, I suggest you abandon your entire effort to reintroduce sheep into the Goat-Steward Mountain area. It was a bad idea to begin with. Instead, 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.

In conclusion, I encourage you to adopt Alternative 2 – the “No Action” alternative.

Respectfully,

Steve Pavlik