



14 June 2024

Colorado Parks and Wildlife  
c/o [dnr\\_cpw\\_planning@state.co.us](mailto:dnr_cpw_planning@state.co.us)  
6060 Broadway  
Denver, CO 80216

**Re: Draft Colorado East Slope Mountain Lion Management Plan**

Dear Director Davis:

Safari Club International (SCI) appreciates the opportunity to comment on the Draft Colorado East Slope Mountain Lion Management Plan.

In general, SCI supports updating the East Slope Mountain Lion Plan, given that some of the individual unit plans are 20 years old. SCI supports the Draft Plan's continued reliance on regulated hunting to manage lions and to provide a hunting opportunity for this healthy and growing population. But SCI does not agree with the stated "concern" that the six previously identified Data Analysis Units are too small to properly study or manage mountain lions, despite the wide-ranging nature of the species.

SCI generally supports Colorado Parks and Wildlife's (CPW) goal to manage the East Slope mountain lion population for "stability," which is reflected throughout the Draft Plan. Mountain lions are the most widely distributed mammal in the Western Hemisphere. Colorado's mountain lion population is stable and likely increasing, especially into new areas. As Ring camera footage from the City of Boulder demonstrates, mountain lions can and do successfully range into human-dominated landscapes, suggesting they are more-than-healthy on the East Slope. But Colorado's human population on the Front Range is also rapidly expanding, thus a stable population objective is most appropriate to maintain a healthy lion population and maintain social tolerance for the species. As we have seen in the last few years in Colorado, Arizona, Washington State, and more, mountain lion attacks can and do occur.

SCI emphasizes that CPW's decisions must be made on the best available science and for the benefit of long-term mountain lion conservation. Where decisions need to be made to ensure the long-term health of predator and prey populations and ecosystems, as well as to reduce human-wildlife conflict, CPW may need to make decisions that are less popular with the public but serve CPW's mission. While being inclusive of the views of diverse Colorado stakeholders is a laudable goal when it comes to taking public input, CPW's decisions need to be made on the basis of sound science and for the benefit of mountain lion populations and human populations that interface with mountain lions. It is CPW's job to responsibly manage wildlife at a level that promotes acceptance and public safety—which means the appropriate level of mountain lion harvest is CPW's recommendation, based on best available science, and should not be subject to public opinion.



SCI generally supports the use of mortality thresholds that provide CPW with some flexibility. It is important to note that significant mountain lion mortality occurs, whether hunting happens or not. In California, which banned mountain lion hunting by voter initiative in 1990, up to 100 mountain lions are lethally controlled to address human-wildlife conflicts each year. One-to-two lions are killed by vehicle strikes every week. Therefore, it is important to manage mountain lions to maintain a stable population, and to consider total mortality in making management decisions.

As SCI supports maintaining a stable mountain lion population, SCI strongly opposes the proposed reduction of the 2026-2027 East Slope (L-ES) harvest objective to 155 lions, a reduction of 53 lions (25%) from 2024-2025 levels. SCI supports continuing to maintain the harvest limit of 208 lions, given that 47 percent of high-quality mountain lion habitat in the East Slope area has no harvest at all. The “assumed” threshold for 2026 and forward appears to be too low, given the stability of the mountain lion population under the current harvest objective. SCI respectfully requests that CPW reconsider this reduction in harvest objective, as it seems to unnecessarily reduce hunting opportunity with little actual impact on mountain lion populations.

SCI supports the use of hounds in mountain lion hunting and CPW’s emphasis on controlling the offtake of female mountain lions (whether higher or lower, depending on management objectives). Hunting with hounds allows for greater selectivity in the sex and age class of the harvested lion.

Finally, SCI strongly supports CPW’s attention to using the best available science, including new research, in the Draft Plan. SCI and its four Chapters in the Centennial State are pleased to help support CPW’s research goals and would be happy to discuss ways that we can contribute to mountain lion conservation with CPW. SCI is dedicated to protecting the freedom to hunt, and we appreciate every opportunity to collaborate with CPW. SCI is always first for hunters.

Sincerely,

W. Laird Hamberlin  
Chief Executive Officer  
Safari Club International