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July 23, 2010

Mountain Lion Plan Comments
South Dakota Game, Fish and Parks
523 E Capitol Avenue
Pierre, SD 57501

Dear SDG&F Commissioners,

On behalf of the Cougar Fund and our members, we present comments on the Draft South Dakota Mountain Lion Management Plan 2010-2015. The Cougar Fund, a national nonprofit dedicated to the conservation of the cougar throughout its present and historic range, works on behalf of its members to ensure that cougar management, as well as management of their prey, are always held to the highest standards of peer-reviewed science. In addition to educating the public about the many issues that surround cougars, we look to balance human interests with healthy cougar populations.

With this particular focus in mind we find the state's Draft Management Plan 2010-2015 seriously lacking in sound peer-reviewed science and direction, as well as support from the general public. As the state increases sport hunting opportunities, and does not utilize or interpret peer-reviewed science accurately, we conclude that cougar populations will be seriously threatened under this management plan.

First, we find it egregious that the state would even consider increasing the quota based on a management strategy, or lack thereof, that basically only takes into account one year of data to predict population trends. Also, it is clear the state does not have the data or desire to manage for not only basic population numbers, but for social interactions – one of the main issues in cougar management today. The flaws and uncertainty in the state's system of analysis lead to what we consider fraudulent science. We also fail to understand the definition and supporting data behind what the state calls "estimated benefits."

Cougars are a self-regulating species, determined by food, habitat and social order. The consensus of peer-reviewed research states 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 all statistical analysis and

comprehensive peer reviewed data the state has assessed on habitat suitability, disease, diet and prey selection, population dynamics, density, social interaction trends and public opinion.

The Cougar Fund would also like to reiterate that killing mountain lions to increase or maintain human and livestock safety is neither productive, nor scientifically proven and regarded by many other western states as an unrealistic and archaic form of game management. Peer-reviewed published research tells game managers that the indiscriminate killing of cougars does not increase human safety or reduce depredation incidents; in fact it may lead to a disproportionate number of juveniles in a population, which are often more involved in depredation incidents. Indiscriminate killing decreases the ability for older experienced males to eliminate or kill off younger cats that the environment and habitat cannot support.

The plan states that only 5% of females harvested have kittens less than 3 months of age. With the goal of an increased quota, and the state choosing to ignore the fact that kittens are raised by their mother's for up to 18 months, there is no doubt that a significant portion of the population will be orphaned at a young age. The juveniles that will be fortunate enough not to die from starvation or exposure, are much more likely to be involved in inappropriate prey selection and behavior – an important issue for all interested stakeholders. Not managing for orphaned kitten death and orphaned juvenile's and their behavior is incredibly irresponsible, not to mention cruel.

In addition to deaths through hunter harvest counted towards the quota, we can conclude that between 30 and 40 additional mountain lions are likely to die from various non-hunting factors. That number again does not take into account the unknown number of kittens that will die, or the number of young lions that will not learn appropriate prey selection and behavior from their mothers. 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. Factoring in all deaths appropriately implies a higher degree of accountability on the part of the public as well as the Department.

Looking at the history of cougar management through out the West, we have seen what happens when a population is over-hunted. South Dakota should be managing for cougars throughout the entire state and not simply focusing on the Black Hills area. Also hunting in South Dakota should be kept at a conservative level. The management plan is pushing the harvest to unacceptable levels. Managing a species that is still struggling to maintain viable populations and complete colonization throughout the state can only be seen as politically based.

We hope that the state of South Dakota will adopt the most “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. We also ask the state to increase hunter education, increase public awareness and education about living in cougar country, encourage appropriate land-use planning, promote improved animal husbandry techniques and hold farmers and ranchers accountable for ignoring ways to reduce or prevent predation.

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

Sincerely,



Sara L. Carlson
Director