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October 2, 2013

Dear Commissioners of South Dakota GFP

The Cougar Fund is a national non-profit organization based in Wyoming and dedicated to the protection of the cougar and other carnivores throughout the Americas. We educate children and adults on the ecological value of the cougar and promote the use of sound science as the basis for management.

Although we are opposed to the sport hunting of cougars, we believe in sensible communication with the goal of respectful and productive dialog between all parties. We acknowledge that the layers of consideration you must factor in order to make your decision are complex. They range from the economic to the philosophical and include ethics, tolerance, tradition, science and politics.

Utilizing South Dakota's public records relating to last years hunting season our consultant biologist Dr. Franz Camenzind made the following observations

*'The count shows 61 mountain lions killed by hunters: 35 females and 26 males. The males ranged in age from 4-5 **months** to 9 years, averaging 2.8 years. Females ranged from 5-6 **months** to 12 years of age, averaging 3.9 years. Twenty-one females were at 2-plus years of age, and applying the rule of thumb that 75 percent of breeding age females are pregnant or have dependent kittens, we can assume upwards of 16 litters were put into jeopardy in this single hunting season.*

*The average weight of the males killed was 107 pounds with a range of **30** to 138 pounds while the females averaged 83 pounds with a range of **33** to 103.*

The only restriction South Dakota has on which mountain lion a hunter can kill is as follows: "Any mountain lion accompanying another mountain lion may not be harvested." There are no age or sex restrictions and no restrictions against taking cats with spots. The quota for the 2013 season was "A maximum harvest of 100 mountain lions (or 70 female mountain lions) ... for the Black Hills Fire Protection District..." (The BHFPD consists of about 3,360 square miles, an area slightly smaller than Yellowstone National Park, or 4.5 percent of the state.) The remainder of the state is open to mountain lion hunting year-round with no quotas. An additional 16 lions were reported to have died from various causes during the hunting season: State removal- 6, Public removal-1, Illegal kill-2, Vehicle-1, Interaction- 2, Emmaciated-1, Other and Unknown- 3.

With a 2010 population estimate of 233 for the BHFPD, a quota of 75 represents an objective of eliminating 32 percent of the states "managed" lion population. With the 2013 harvest of 61 lions plus the known death of another 16, South Dakota lost about one-third of its mountain lion population in just over 3 months. Mountain lion biologists have concluded that to sustain a population, human-caused mortality should not exceed 14 percent annually and anything over 27 percent on a long-term basis will keep the population from recovering.'

Your department is mandated to maintain wildlife populations while balancing the use of mortality limits to manage in a sustainable fashion. This may mean hunting animals to reduce populations where there are too many, and reducing harvest in areas where there are too few. In the case of mountain lions, management also includes hunting animals to reduce the potential for human-cougar conflicts

However, research in the last 10 years has shown that increasing cougar hunting in areas of healthy numbers does not reduce cougar conflicts with people, and may even exacerbate the problem (Stoner et al. 2006, Robinson et al. 2008, Cooley et al. 2009a, Cooley et al. 2009b, Knopff et al. 2010). Therefore, we believe the SDGFP is violating their own mandate to use best science to manage mountain lions. Science indicates that the elimination of all sport killing would be advisable, but at the very least, limits should be reduced significantly to diminish the chances that management by hunting may increase (rather than decrease) conflicts with people. We realize you may choose to set a quota to allow for the recreational practice of cougar hunting, but there is a lack of any scientific evidence that current limits are sustainable or based on available best science.

The Cougar Fund urges you to reconsider your current +/-32 percent harvest limit for next year's overall and female quota, or face the possible consequences of a younger less stable population of mountain lions and the ensuing likelihood of negative encounters.

Very Respectfully Submitted,

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