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January 14, 2015

To: Members of the South Dakota Game, Fish and Parks Commission
Acting Secretary Hofer
Wildlife Division Director Leif

Greetings,

I would like to preface my comments by sharing my appreciation for the courteous and professional reception I have always received from members of your staff. Thank you for considering our sincere request for the ***Commission to reject the rule change to allow hound hunting on the prairie*** for the following reasons.

Situation

The Black Hills Fire Protection District (BHFPD) is home to an isolated population of mountain lions. According to the 2010-2015 South Dakota Mountain Lion Management Plan (SDMLMP), this is the population that you manage for the purposes of providing a sustainable 'recreational opportunity' for hunters. The SDMLMP acknowledges that dispersal of both males and females into the Prairie Region does occur.

Problem

The presence of mountain lions on the prairie has led to fearfulness on the part of agricultural producers.

The question I urge you to consider is:

“Does the staff of South Dakota Game Fish and Parks (SDGFP) have an existing policy that deals successfully with the fear of depredation by mountain lions and have they been successful in implementing this policy?”

The first test of whether this question can be answered positively is whether there have been any confirmed depredations and the answer is a resounding NO! *There have never been confirmed depredations of pets or livestock, or negative encounters with people on the Prairie.*



The second test is the availability of SDGFP to respond to reports of mountain lions in the area. SDGFP is available 24/7 and 365 days per year. They have an experienced and professional houndsman who can respond with wildlife personnel, in keeping with your commitment to “*managing mountain lions in accordance with biologically sound principles*” (sic. SDMLMP 2010). The SDGFP response team can investigate and mitigate threatening situations at any time.

SDGFP already has an exceptionally thorough track record for mountain lion removal. The dearth of public land has prevented your staff from successful relocation attempts and they have consistently responded to public safety concerns with rapid and uncompromised permanent removals.

The absence of confirmed depredations or attacks confirms the effectiveness of the current policy and response history of the SDGFP.

Further points for your consideration:

- Please do not make such an important decision until the new Secretary of the SDGFP has assumed his position.
- Hound hunting is only effective if tracks are fresh, visible and confirmed to be mountain lion. This requires a speedy response, a high level of experience and ideally, snow cover.
- Is using amateur hound enthusiasts (who may be employed and cannot leave at a moment’s notice) a better option for conflict management than your own professional and experienced staff?
- Hound hunters traditionally advocate for sustainable populations of mountain lions to allow them to continue and pass on their sporting heritage. SDGFP states it does not intend to manage for a sustainable mountain lion population on the Prairie, so the presence of hound hunters is incompatible with that intention.
- Allowing hound hunters to ‘practice’ on dispersing mountain lions because SDGFP does not intend to research or manage them is neither ethical nor representative of the North American Model of Wildlife Conservation (which advises against “wasteful and frivolous killing”).
- Hounds, as are any pack of dogs, are extremely disruptive to livestock. The nature of the chase opens up the possibility of trespass, collateral losses of domestic animals, native wild prey (especially during fawning), and property damage.



- The original year-round opportunity to boot hunt on the Prairie was largely in response to fear of the widespread presence of cougars. The extremely low number of management removals in addition to the low hunter harvest is evidence that the fear that generated the Prairie hunt was largely unfounded. *To further affirm an unsubstantiated fear by allowing hound hunting is unjustified.*
- Conflict prevention and non-lethal deterrents are the very best methods of encouraging the public to be responsible for their own safety and that of their families, pets and livestock. The Prairie will continue to receive dispersing lions and may even host one or two that eke out an existence for longer periods of time. Aggressive removal to mitigate fear is not a solution. It is just killing one lion at a time and it is a stumbling block to the idea of safe coexistence. People will only tolerate lions and benefit from the presence of this keystone species if they know HOW to live with lions on the landscape. Further expanding the ways in which lions may be killed defeats all the progressive educational and philosophical ideologies that you so wisely included in the SDMLMP.

In conclusion, I thank you once again for reading the comments of The Cougar Fund. We are a national non-profit organization committed to education, advocacy and best available science. We provide science-based information; only knowledge will result in tolerance for the iconic mountain lion and its contribution to enhanced ecological diversity. Our advocacy efforts are focused on questioning the scientific validity of killing apex predators by random culling (sport hunting of cougars). Hound hunting is controversial and undesirable because it fails to adhere to the fair chase ethic ascribed to by the American hunter. Public safety is a goal that can be achieved by practices that go beyond the gun.

Please accept these remarks with the same respect with which they have been submitted.

Sincerely,

Penelope Maldonado
Managing Director
307-733-0797
penny@cougarfund.org