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South Dakota Game Fish and Parks
523 East Capitol Ave
Pierre, SD 57501

August 26th 2019

Thank you for the opportunity to comment on the latest iteration of the South Dakota Mountain Lion Management Plan (MLMP).

The Cougar Fund has many constituents in South Dakota and we submit this letter on their behalf.

The Board, Staff and supporters of The Cougar Fund have deep and genuine discomfort with the hunting of mountain lions for recreation, but feel that we can make observations and suggestions that are in the common interest of helping conserve and protect these magnificent animals.

We must clearly state that we understand SDGFP already knows the direction it intends to go in providing mountain lion hunting opportunity, and utilizes science to prevent additive mortality.

We note that South Dakota Game Fish and Parks (SDGFP) continues to closely research and monitor the semi-island population of mountain lions within the Black Hills Fire Prevention District (BHFPD) and appreciate access to that information both on-line form, and at a meeting I personally attended on July 31st.

John Kanta, who presented the analysis, noted some unexpected and unexplained anomalies with regard to the most recent data. We would encourage the department to err on the side of caution going forward with season setting responsibilities where the confidence interval for population estimation has such a wide margin. Please use the next two-year cycle to be very conservative when deciding on harvest mortality limits. We respectfully ask you to explore the possibility of a limited draw to manage hunter overcrowding and possible over-harvesting of a lion population that your monitoring suggests may be in decline?

It is of great interest to us that the draft MLMP will be adopted for the next ten years and the following comments are specific to adding flexibility to the MLMP that will allow changes to be made as conditions change.

Prairie region

Currently this large portion of the state has year-round unlimited hound hunting with no boundaries except for those of private landowners who may not allow hunting on their land. The philosophy behind this has always been the lack of suitable habitat and the possibility of conflict with livestock. We recognize the difficulty hard working ranchers have when a large carnivore that has not been present in their lifetime once again becomes part of the landscape.

Social tolerance and cultural acceptance are difficult concepts when it comes to protecting public health and family interests. The prairies of South Dakota, North Dakota, and Nebraska, are on the leading edge of mountain lion dispersal and recovery and we understand there is some resistance based on real fears.

SDGFP may be able to help mitigate some of these concerns by expanding their program of outreach and education in rural areas of the state, together with a trusted, professional, response to conflict situations. We know from the process of mountain lion recovery in source states and the resulting increase in public tolerance (and switch to more conflict prevention awareness) that sharing appropriate landscapes is possible, but does take time and knowledge and a willingness to be situationally-aware.

Mountain lions are already dispersing out of states with confirmed populations. As generalists they are able to utilize the less-than-suitable habitat of the prairies as a stepping stone to more appropriate habitat that will support them with less proximity to human interest and development. The Cougar Fund would like to emphasize the positive role SDGFP can play in setting parameters for future management of the prairie.

We very respectfully suggest the following possibilities be considered for the 2019 MLMP

- Divide the prairie into hunt areas, even if they all remain 'unmanaged' as they are now. This will provide you with the opportunity to follow up on the breeding populations you have already discovered and the flexibility to manage hunting in the future in areas specific to recovery and eastward dispersal.
- Identify areas of suitable habitat, whether semi-island, or riparian, and designate them as refuge areas (where no-or very limited hunting- is allowed) for the purpose of connectivity to appropriate recovery locations.

- Continue with your conscientious monitoring of breeding females and kittens on the prairie to enhance the research you have already been conducting. Respond to what you find through the adaptive management process.

General considerations

- Thank you for providing a self guided resource for lion identification to your hunters. Perhaps there is an opportunity to incentivize new and inexperienced hunters to take the course as a prerequisite of obtaining a license?
- Please give your full support to the department's law enforcement officers who have had to deal with crimes related to mountain lion poaching, and hunting violations. Lack of respect for both the animals and the statutes governing their management casts everyone in a bad light and should not be tolerated.
- Consider the ecological contributions of mountain lions. By dispersing large herds into smaller units they can help with forage restoration, waterbed erosion and the culling of weak, sick or old animals. Dispersed herds have lower disease transmission rates and with Chronic Wasting Disease a very real threat these days, the benefits of compensatory predation are apparent.
- Remember...predator and prey evolved together. Lions have not managed to wipe out their food source in all the millennia of cohabiting the landscape and they are probably not about to in the future!
- Please explore ways for your non-hunting wildlife enthusiasts to be contributing members of your agency's mission.

In conclusion, may I express my sincere appreciation of the SDGFP biological staff who study and manage mountain lions. They have always treated me with great respect, provided me with the information I have been seeking and also educated me along the way! I have enjoyed warm, two-way communication, and hope to continue to have a productive relationship in the future. A future, which I hope will expand the scope and diversity of the traditional constituent and thereby increase the revenue stream that conserves wildlife for *all* South Dakotans.

Very respectfully submitted,

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The Cougar Fund is a 501(c)3 organization. Our tax number is 31-1796418.