



MOUNTAIN LION FOUNDATION

Saving America's Lion

The mission of the Mountain Lion Foundation is to ensure that America's lion survives and flourishes in the wild.

August 16, 2024

Stephanie Rissler, Chair
South Dakota Game, Fish and Parks
221 Lake Ridge Drive
Wentworth, SD 57075

RE: Mountain Lion Action Plan

Dear Chair Rissler and members of the South Dakota Game, Fish and Parks Commission,

We write to you on behalf of our South Dakota members with comments on the draft Mountain Lion Action Plan for 2024-2028. While there is much in this plan to praise, we also feel that there is room for improvement.

South Dakota Game, Fish and Parks (SDGFP) prepared this plan with input from a stakeholder group which was weighted heavily toward hunting groups and livestock owners. There was limited input from conservationists or from scientists outside the department. The Mountain Lion Foundation requested a chance to participate in that meeting, but the request was declined. That group ultimately did not recommend reducing the population target for mountain lions, nor increasing the harvest limits. We are pleased that these recommendations to maintain the status quo are reflected in the current draft of the Action Plan.

While the current rate at which mountain lions are killed by hunters is higher than we would recommend, and higher than is necessary for the ecology of mountain lions (which do not require hunting to maintain their population), the decision to hold hunting steady is a recognition that the current hunting regime is at the limit of what the comparatively new mountain lion population in South Dakota can sustain, and that in order for mountain lions to recover the population that was extirpated by excessive hunting in the 19th and early 20th centuries, it is necessary not to further increase hunting. Mountain lions have slowly spread

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east into the Dakotas and Nebraska in the last decades, and there is a strong desire to see mountain lions recover further east in those states, and indeed throughout the eastern United States. Current policy in South Dakota unfortunately does not protect mountain lions outside of the Black Hills, a policy which necessarily limits the natural spread of that population.

Discussing those areas outside the Black Hills, the Action Plan notes that there is no population objective for populations in the prairie, in part due to the lack of substantial population surveys of those areas. The Action Plan notes that “these areas are managed primarily to abate potential livestock losses on private property while at the same time to provide recreational hunting opportunity.” We would suggest that developing scientific surveys of the prairie populations would be a valuable contribution to the scientific literature, documenting the behavior and ecology of the species as it recolonizes former territory. It would also allow development of management objectives that reflect the ecological benefits mountain lions provide, and not merely address the risk of livestock conflict. We urge that such research be added as an objective in the action plan.

The Action Plan correctly observes “To help minimize [livestock] conflicts when possible, GFP must ensure that mountain lion populations are managed proactively and that management goals are being met.” Minimizing conflict is an important goal and one that SDGFP can play a critical role with. Research throughout the range of mountain lions shows, consistently across states and multiple independent studies, that increased hunting does not reduce conflict. Indeed, multiple research groups independently find that hunting tends to *increase* conflict with livestock. There are several proposed reasons for this phenomenon, rooted in the biology of the species. While it is a somewhat counterintuitive finding, it is important to emphasize that the intuitive belief that killing mountain lions reduces conflict is not borne out by empirical study. We urge that management goals for mountain lions reflect the best available science and not rely on the hunting of mountain lions as a mechanism for addressing conflict. Instead, management should emphasize the use of nonlethal deterrents, especially livestock guardian dogs, adequate fencing, and well-designed enclosures for livestock, and a combination of public education and landowner outreach to ensure that livestock owners understand the tools available to help them and their livestock live safely and confidently alongside these native carnivores as the species recovers its population.

The Action Plan notes that SDGFP is pursuing exactly that course. It explains: “Furthermore, GFP is currently working on an informational brochure which demonstrates successful techniques used to protect chicken and other domestic animals from mountain lions.” The Mountain Lion Foundation has worked with state fish and wildlife agencies in several states to develop exactly such brochures, and it would be our pleasure to collaborate with SDGFP as well, or to share our experience in writing and distributing those educational materials. Please don’t hesitate to reach out if we can be of assistance in those valuable efforts.

We also reiterate longstanding areas of concern with mountain lion management in South Dakota. The Action Plan Objective 2 sets out the goal to “manage mountain lion populations for both maximum and quality recreational hunting opportunities, considering all social and biological inputs.” Maximizing human killing of mountain lions is not ecologically necessary, and as discussed above, poses a real risk of increasing conflict and potentially harming ungulate populations. As apex carnivores, mountain lions do not require hunting to maintain stable populations in balance with their prey. Research throughout the West has shown that increased hunting does not benefit deer or elk populations. Because of their territorial behavior, killing established resident lions can cause local populations of mountain lions to actually *increase*, placing further pressure on prey populations temporarily. Those overhunted populations can also be more prone to conflict with livestock, as they tend to be dominated by younger, inexperienced male mountain lions. Numerous studies show that this is the most conflict-prone demographic. Reducing objectives for human killing of mountain lions would benefit this ecologically-sensitive species, and could bring benefits for hunters and livestock owners.

In this vein, we also have concerns about part b of Objective 2, which sets a goal to “maximize hunting opportunity for hunters with dogs” in the Custer State Park unit. Hound hunting poses risks to other wildlife, livestock, and pets. Hounds travel across park boundaries, and can become distracted by pets or livestock on the property they are trespassing on and can attack or injure park visitors, pets, or livestock. In addition, hound teams that encounter a female who is caring for young are more likely to kill the cubs or to drive the mother far from her family, making it harder for hunters to avoid orphaning those cubs. When a pack of GPS-collared hounds are set to chase a mountain lion, the chances of a kill on that hunt is higher than for a boot hunt. This higher killing efficiency is particularly challenging for a small and recovering population like South Dakota’s. Prioritizing boot hunting would do more to protect park visitors, neighbors, and wildlife in the park.

Instead of managing primarily with the goal of maximizing hunting today, we urge the Commission to set a goal of long-term recovery of mountain lions throughout South Dakota, and the health and stability of the metapopulation of mountain lions throughout the Plains states. South Dakota’s population is essential to the future recovery of mountain lions in states further east, and its mountain lions disperse to and sustain the genetics of surrounding states including North Dakota, Nebraska, Wyoming, and Montana, and is in turn sustained by immigration of mountain lions from those states. The killing of lions in South Dakota affects all those states. Managing with an eye toward overall stability would, as emphasized above, require further study of the prairie populations outside the Black Hills. It would also require coordination with Tribal governments to monitor the number of mountain lions killed by all hunters and all responses to conflict within South Dakota’s borders. And it would require the state to consider dispersal corridors and highway crossings to ensure the ready movement of

mountain lions between population in and around South Dakota. Restoring the statewide range of mountain lions, and allowing the species to recover in neighboring states as well, would have ecological and social benefits, discussed above. While we would hope the state would consider the wisdom of this choice, we note that this recovered population could also allow greater hunter opportunity throughout the state than would be possible with a population limited to the Black Hills.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Rosenau', with a long horizontal flourish extending to the right.

Joshua Rosenau
Director of Policy and Advocacy

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