



# 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 19<sup>th</sup> and early 20<sup>th</sup> 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

(916) 442-2666 ext. 107

[jrosenau@mountainlion.org](mailto:jrosenau@mountainlion.org)

September 13, 2024

South Dakota Dept. Game Fish and Parks  
523 E. Capitol Avenue  
Pierre SD 57501

Re: Mountain Lion Action Plan

Dear Agency:

Your Mountain Lion Action Plan has the following fatal errors:

1. What are the credentials of the individuals making this major decision for the State of South Dakota?
2. What was the total number of participants in the studies?
3. Explain precisely how you determine the number of mountain lion that are currently living in the Black Hills.
4. Do you have some sort of backup plan should the population be decimated by a virus or something similar?
5. What is the purpose for the reduction?
6. Provide statistics demonstrating you have completed a cost benefit analysis.
7. Why was the participation of the other Lakota Tribes not actively sought?

You discuss “social tolerance”. A hunter’s social tolerance is much different than a non-hunter, and it appears you are catering to the hunter. Let’s discuss the Agency’s wonderful plans which have been touted over the past several years. I reside on a remote acreage. When I moved to the area I would see numerous possums, raccoons and an occasional fox. But then your agency came up with this brilliant idea to place a bounty on red fox, skunks, badgers, possums and raccoons in order to protect the interests of pheasant hunters. Your plan has resulted in pets being poisoned as well as at least one endangered animal. And guess what? I still don’t see any pheasants nor do I see any other animals that I used to enjoy. Further, I do not believe your agency has any idea how you are affecting the populations of these animals you seek to destroy. My social tolerance for making major decisions without supporting evidence is very low.

You have a responsibility to ensure these majestic animals survive for future generations. Your responsibility does not run toward individual hunters who believe that people enjoy seeing a stuffed head on a wall. I want to see more substance behind your decision which at this time is completely lacking.

Sincerely,

/s/ Bobbi J Doerfler  
Bobbi J. Doerfler, Esq.

Tom Laffey  
2023 10th Ave  
Belle Fourche SD  
57717

9/18/24

Attachment 13157

RE: MOUNTAIN LION ACTION PLAN  
TO GFP,

I WOULD LIKE TO <sup>SEE</sup> A LONGER  
HUNTING SEASON FOR MTN  
LIONS AND THE USE OF HOUNDS  
TO TREE THEM.

I LIVED IN ALASKA FOR OVER  
20 YEARS AND I KNOW THE  
IMPORTANCE OF PREDATOR  
CONTROL, ESPECIALLY IN RURAL  
AREAS.

I DO NOT THINK GAME MANAGEMENT  
SHOULD BE DICTATED BY BALLOT  
INITIATIVES.

THANK YOU

Tom Laffey  
TL

(605) 210-1553

SEPT 18, 2024

DEAR

I THINK MOUNTAIN LION  
WEE ZOO SIOUX FALLS WILL BE  
GOOD.

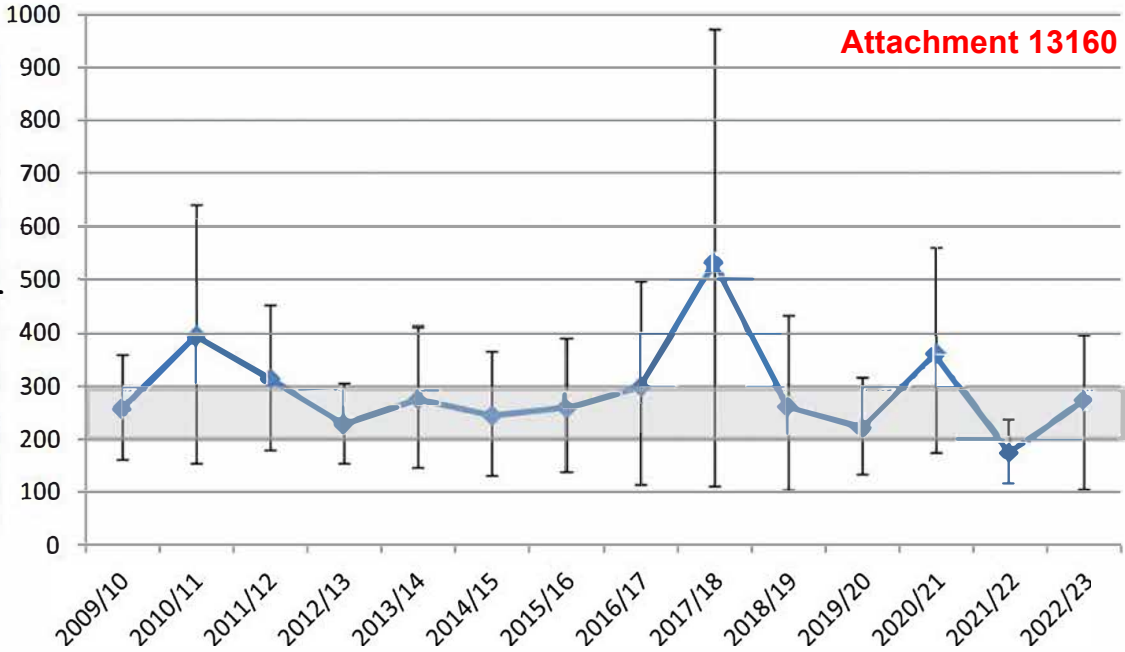
THANK YOU  
EVERYONE HORNER

WRITE ME LET ME KNOW!



**Mountain Lion Population Estimate**

**Attachment 13160**



I'm writing with feedback on *Objective 2* in the 2024-2028 South Dakota Mountain Lion Action Plan:

- 1) **Remove “maximum” from “Manage mountain lion populations for both maximum and quality recreational hunting opportunities.”** Providing recreational hunting opportunities must be balanced with ecology and keeping a sustainable mountain lion population. Care should be taken that hunting does not impede the public's enjoyment of public lands. Wildlife watchers exceed hunters in U.S. Fish and Wildlife Service studies that count wildlife associated recreators nationwide. A hunted lion or its tracks are not available for watching.
- 2) **Remove the phrase “Modify and adopt hunting season structure as needed to minimize regulation complexity.”** Simplifying regulations should not take priority over letting the public have a voice in regulations that affect public lands and animals.
- 3) **Remove “maximize hunting opportunity for hunters with dogs”.** Hound hunting is inhumane – it not only results in the injury and death of the wild animal, but sometimes the dogs themselves. Animals are run to exhaustion and can be mauled if unable to climb a tree in time. Packs of dogs chasing wild animals are also a public safety and a private property issue - dogs can run miles away from their handlers and are not under their control at that time.
- 4) **I oppose reducing the population objective from the original 300-200 mountain lions to 250-150 mountain lions.**
- 5) **I oppose unlimited harvest and year-long hunting on the prairie unit.**

Finally, I want point out that **animal cruelty is implicit if hunting of female mountain lions is allowed, as there is no time you can schedule the hunt to avoid orphaning kittens.**

According to the National Wildlife Federation's website: *"Mountain lions can breed year-round. Female mountain lions usually give birth every two years. Litters can range in size from one to six cubs. The young may stay with their mother for as long as 26 months, but usually separate after about 15 months."*

SDGFP's 2024 Black Hills Mountain Lion Count shows 30 female mountain lions killed. If we assumed that each female has an average of 3 mountain lions in her care, killing those 30 females resulted in 90 kittens that died of starvation.

**Wildlife is a public resource meant for the enjoyment of all, not just a small group of trophy hunters.**

Thank you for considering the opinions of all South Dakotans when deciding wildlife policy.

Sara Parker  
Sioux Falls, SD



# 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  
 523 East Capitol Ave  
 Pierre, SD 57501

### **RE: Mountain Lion Action Plan and proposed population reductions**

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 to voice our concerns with the draft Mountain Lion Action Plan for 2024-2028. While there is much in this plan to praise, the proposal to reduce population targets is deeply concerning and risks reversing progress South Dakota has made in restoring this species. We urge you to reject the proposed reduction in target population and retain the current goal of 200-300 mountain lions and set a goal for further research on South Dakota's unique mountain lion population to set science-based targets for the Black Hills and other areas of the state with breeding populations.

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. There was no such recommendation from agency staff and scientists at the stakeholder group, no such request was raised by others at the stakeholder meeting, and no scientific grounds were presented to justify this change in population target at the commission meeting of September 5, 2024.

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The prior population target was based on the department's field research and accumulated wisdom and research from states with a longer history of managing mountain lions. Mountain lions self-regulate their densities, and do not generally require hunting by humans to manage their population size. Research in many western states, from Washington to Arizona, has confirmed that independent-aged mountain lions (18 months and older) generally operate at a density of roughly 2.2 mountain lions per 100 km<sup>2</sup>. In the Black Hills, that would place a stable population at 200-300. Research has shown that it is difficult to maintain a population well below that density, and that doing so often results in severe disruption to the social structure of mountain lions. That disruption has several harmful consequences beyond the immediate harm to the big cats.

Healthy, stable mountain lion populations self-regulate in part because older, established males drive off younger males as they disperse in from more distant areas. Young females tend to find home ranges near their mothers'. High mortality rates, especially from trophy hunting by humans, tends to remove the oldest individuals, those who are most effective at driving out younger males. Young male mountain lions are statistically the most prone to conflict. Young mountain lions are also less experienced and may be less physically able to kill their preferred prey: deer and elk. Starving young mountain lions can thus be more likely to pursue other prey, including rabbits, raccoons, and other wildlife, but sometimes also domestic animals. In addition, because they are less effective at defending a territory, local densities can actually *increase* after older individuals are killed. High rates of hunting mortality thus open up territory that will be occupied by more young individuals which are more prone to conflict. This tendency increases as mortality levels rise, with numerous researchers across multiple states finding this same pattern: increased killing leads to more conflict.

That substantial research literature was developed in states and Canadian provinces where mountain lions were never extirpated. In those areas, individuals could disperse into heavily-hunted sink habitats from multiple areas. South Dakota is unusual in being one of the few states where mountain lions have returned since their extirpation a century ago. The brief window in which the state has had a breeding population has not allowed rigorous study that might be compared directly to the research conducted further west, and so the results of this uncontrolled experiment on the population is harder to predict than it might be elsewhere. Rushing into this decision without a scientific basis is risky and ill advised. It creates new and unpredictable risks for the state's livestock owners.

The proposal to reduce this population by up to half also threatens the growth and restoration of this beloved species within South Dakota and in other states. Dispersers from South Dakota often are found to be the pioneers heading east into Minnesota and states further east where the species has not yet returned to breeding. In addition, South Dakota's mountain lions operate in a metapopulation of relatively isolated patches of high quality habitat ranging from

Nebraska to North Dakota. Those states, like South Dakota, have relatively new breeding populations, and this dramatic increase in mortality could threaten the stability of the populations in those neighboring states as well.

In short, this proposal creates unnecessary risks and will provide no clear benefits. It is unlikely to significantly reduce conflict rates, and may increase them. It will undercut the progress South Dakota has made to restore ecological balance that apex carnivores provide to ecosystems. Mountain lions have been documented as having more ecological connections to other species than any other carnivore, standing as a key “ecological broker” in ecosystems where they live. Harming them harms the entire ecosystem. Rather than a rushed move, the Commission and staff should move deliberately to evaluate the ecological and social risks from this dramatic change in management that was not requested by the department’s stakeholder group.

We urge that you return to the draft plan’s recommendation to hold hunting rates steady. 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 19<sup>th</sup> and early 20<sup>th</sup> centuries, it is necessary not to further increase hunting. Mountain lions have slowly spread 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.

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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.

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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. Reducing the state's mountain lion population would be a move in the wrong direction, harming all of those goals, risking increased conflicts with livestock, and harming the many South Dakotans who sincerely wish to see this beloved species fully recover in South Dakota and throughout its historic range. 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  
(916) 442-2666 ext. 107  
[jrosenau@mountainlion.org](mailto:jrosenau@mountainlion.org)

South Dakota Division



# The Izaak Walton League of America

Defenders of Soil, Air, Woods, Waters, and Wildlife

September 29, 2024

Re: Support Proposed Fee Increase

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

Dear Commissioners,

On behalf of the South Dakota Division of the Izaak Walton League of America (Division) thank you for this opportunity to comment on the Game, Fish, and Parks' proposal to increase fees within the Division of Parks and Recreation and the Division of Wildlife. The Division urges your full support of this proposal.

An evaluation was done of the expenses GFP incurs when conducting its business. This determined that this fee increase is needed and necessary. The last time the Division of Parks and Recreation increased fees was 2019. The Wildlife Division has not increased fees since 2014. The Division believes these modest increases are long overdue.

Revenue generated from the increased fees is expected to be between \$5-5.5 million annually. That additional revenue is needed for GFP to maintain the services, facilities, programs, operations, and staffing to meet the growing demand and the high expectations of the users of the state's park system and for the people that enjoy fishing and hunting across the state.

The cost of a license and the other associated fees are usually the smallest expenditure for most people when spending time in the outdoors. Approving this proposal will help GFP continue to work to achieve its two top priorities, improving habitat and increasing access across the state.

The South Dakota Division of the Izaak Walton League of America urges your support, and we thank you for your time and consideration.

Sincerely,



Paul Lepisto  
1115 South Cleveland Avenue  
Pierre, SD 57501  
605-220-1219  
[pauldonna2@pie.midco.net](mailto:pauldonna2@pie.midco.net)





September 25, 2024

Stephanie Rissler, Commission Chair  
South Dakota Game, Fish and Parks  
501 Bulow Street  
Vermillion, SD 57069

Tom Kirschenmann, Director of Wildlife  
South Dakota Game, Fish and Parks  
523 East Capitol Ave  
Pierre, SD 57501

**RE: Draft 2024-2028 Mountain Lion Action Plan (Updated: Population Objective Reductions)**

Dear Chair Rissler, Director Kirschenmann and Members of the Commission:

On behalf of the Humane Society of the United States and our supporters in South Dakota, I thank you for this opportunity to submit comments on South Dakota Game, Fish and Parks' (GFP) Draft 2024-2028 Mountain Lion Action Plan. We strongly oppose the proposal to decrease the so-called mountain lion "population objective" from 200-300 to 150-250. Any population objective is completely arbitrary, and lowering the population objective to excuse unsustainable, unjustifiable, and counterproductive levels of trophy hunting is counter to science-based wildlife management and the ethics and values of South Dakotans. Further, it risks inbreeding depression and threatens the long-term viability of mountain lions in South Dakota. Gilbert et al. (2016) even found that mountain lions protect human life by reducing deadly vehicle-deer collisions, saving South Dakotans \$1.1 million annually.

We oppose the use of hounding to pursue mountain lions, and the year-round season outside of the Black Hills Fire Protection District (BHFPD). These practices harm the small mountain lion population in South Dakota and potentially increase conflicts with livestock. We urge you to revise the Draft Action Plan to end, or at the very least significantly reduce, these practices so that hunting opportunity is not privileged to the detriment of conflict reduction and the ecological and social value of mountain lions.

The Humane Society of the United States is categorically opposed to the trophy hunting of mountain lions in South Dakota. This practice is not only cruel and unnecessary, but researchers have found that excessive hunting of mountain lions leads to increased conflicts with humans, pets and livestock.<sup>1</sup> Furthermore, trophy hunting and predator control of mountain lions indirectly harms ungulates because predators target sick animals, including those with chronic wasting disease.<sup>2</sup> Finally, a national survey conducted by the National Shooting Sports Foundation and Responsive Management show that only 29% of Americans approve of trophy hunting.<sup>3</sup>

For these reasons, and those outlined in Appendix A of these comments, we request that SDGFP revise the Draft Mountain Lion Action Plan, end the use of hounds to pursue or hunt mountain lions, and protect mountain lions from trophy hunting now and in perpetuity.

If GFP is to continue allowing the trophy hunting of mountain lions, we request the agency limit the practice to sustainable levels (defined below) to protect South Dakota's iconic mountain lion population from excessive killing and to limit conflicts caused by indiscriminate hunting of these native cats. Specifically, we request the following changes:

1.) At the very least, do not lower the population objective, and ideally, lift the arbitrary population objective of 200-300 total mountain lions. The annual hunting limit should not exceed 14% of South Dakota's adult and subadult mountain lion population. GFP estimates that 176 adult and subadult lions live in South Dakota as of January 2024. GFP should count its lions using contemporary methods and not allow hunters to kill



more than South Dakota's mountain lion population growth rate. Non-spatial population models overestimate mountain lion populations by an average of 63%, and many jurisdictions count dependent kittens in their estimates.<sup>5</sup>

According to GFP's current, and likely unreliable, estimate of adult and subadult mountain lions, hunter kill exceeded 25% of the adult and subadult population in the 2023-2024 season. Beausoliel et al. (2013) suggest that in the absence of population data, agencies should not set quotas that exceed 14% of the mountain lion population to avoid destabilizing social structures and increasing conflicts.<sup>6</sup> Colorado Parks and Wildlife (CPW) recently adopted a cap of 14% on mountain lion hunting quotas as part of their new West Slope Mountain Lion Management Plan.<sup>7</sup> Additionally, CPW has adopted a cap of 16% on total human-caused mortality to account for other sources of lion deaths. Washington state has also recently adopted a conservative more conservative mountain lion quota in order to maintain stable mountain lion social structures to minimize conflicts.<sup>8</sup> Since South Dakota's mountain lion population is especially isolated from dispersal to and from other populations, an even more conservative hunter offtake should be implemented.

GFP's Draft Action Plan continues to authorize trophy hunting of mountain lions that exceed sustainable levels, threatening the stability of South Dakota's mountain lion population To quote directly from materials provided by GFP itself to the Commission at its July 2023 meeting:

If the four-year average of 26 females is harvested next year, the population is expected to decrease to just over 200 by December of 2024.... Alternatively, if the harvest limit is achieved and 40 females are harvested next year, the population is expected to decrease to under 200 mountain lions, and below the population objective of 200 to 300.<sup>10</sup>

The Commission's reaction to this information should be to seriously reconsider the truly excessive level of recreational hounding and trophy hunting of mountain lions. Any population objective, especially one that was already low, is entirely arbitrary and does not allow for a species to fulfill their essential ecological niche. Just lowering a population objective when a population is disastrously declining is simply backward. Not only would this move destabilize social structures, increase conflicts, and put unnecessary stress on an already small population, it also flies in the face of so-called "sustainable yield" hunting principles to ensure wildlife remains for future generations. Even if hunting opportunity is the only priority of the Commission, lowering the population objective without scrutinizing human-caused mortality is harmful in the short and long term.

Any species needs robust numbers to maintain genetic fitness. Small populations experience inbreeding depression, bottlenecking, and genetic drift, increasing the incidence of detrimental traits, potentially reducing reproductive success, and increasing susceptibility to disease.<sup>11</sup> Other large carnivore populations that are larger and more connected experience this risk. *Effective population size*—that is the number of individuals who are participating in the genetic health of the population—is just a fraction of the number of individuals counted (or population census).<sup>12</sup> The effective population size could be just 10% of the census population, or lower.<sup>13</sup> For example, the Greater Yellowstone Ecosystem population of grizzly bears was found to be at risk of genetic drift due to their isolation from other populations and low effective population size, with their population numbering approximately 1,000.<sup>14</sup> South Dakota's mountain lion population is already isolated and precariously low. The state's efforts must urgently go toward stewarding South Dakota's few remaining mountain lions to ensure their short- and long-term survival and fitness.



We therefore call on the agency to count South Dakota's mountain lions using contemporary spatial-model methods, implement at most a 14% cap on hunting mortality and a 16% cap on total human-caused mortality based on adult/subadult population estimates while doing away with the agency's arbitrary population objective, and instead direct resources toward conserving the remaining population and educating and assisting residents in nonlethal strategies. Please see Section 4 of Appendix A for a detailed discussion of how excess hunting destabilizes mountain lion social structures, exacerbating conflicts, as well as effective nonlethal strategies to prevent conflict.

3.) Prohibit the hunting of mountain lions with hounds throughout South Dakota and reject any proposed rule that would expand hound hunting.

As detailed in Appendix A, using radio-collared hounds to chase mountain lions and bay them into trees or rock ledges so a trophy hunter can shoot at close range is unsporting, unethical and inhumane.<sup>16</sup> Hounds kill kittens, and mountain lions often injure or kill hounds.<sup>17</sup> The practice is exceedingly stressful and energetically taxing to mountain lions.<sup>18</sup> Furthermore, hound hunting is not considered "fair chase" hunting by most.<sup>19</sup> Hounds also chase and stress non-target wildlife, from porcupines to deer,<sup>20</sup> trespass onto private lands,<sup>21</sup> and have adverse interactions with the public.<sup>22</sup> If GFP is to continue allowing the hunting of mountain lions, the agency must prohibit the use of hounds and reject hound hunting in the Black Hills Fire Protection District.

In conclusion, the Humane Society of the United States strongly urges GFP to revise its Draft Mountain Lion Action Plan as it seeks only to maximize trophy hunting opportunities, not conserve mountain lions. South Dakota's mountain lions are a vital component of our natural wild heritage and deserve reasoned management for long-term conservation.<sup>23</sup> If GFP is to continue allowing hunting of mountain lions, the agency must limit the practice to no more than 14% of the adult/subadult population so that it does not exceed sustainable levels. Additionally, total human-caused mortality must be limited to no more than 16% of the mountain lion population. Lastly, hound hunting of mountain lions must be prohibited throughout South Dakota. Thank you for your consideration.

Sincerely,

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## Appendix A

### 1. Mountain lion trophy hunting is unsustainable, cruel and harmful to family groups

Trophy hunting is the greatest source of mortality for mountain lions throughout their range in the United States.<sup>24</sup> The practice is harmful to more than just the wild cats who are killed. Conservation biologists have condemned this practice as unnecessary and wasteful. Batavia et al. (2018) write that compelling evidence shows that the animals hunted as trophies have sophisticated levels of “intelligence, emotion and sociality,” which is “profoundly disrupted” by trophy hunting.<sup>25</sup> For these reasons, GFP must not allow trophy hunting of mountain lions in South Dakota.

- A. *Trophy hunting is unsustainable and cruel:* Large-bodied carnivores are sparsely populated across vast areas, invest in few offspring, provide extended parental care to their young, have a tendency towards infanticide, females limit reproduction and social stability promotes their resiliency.<sup>26</sup> Human persecution affects their social structure,<sup>27</sup> and harms their persistence.<sup>28</sup>

Conservation biologists have shown that trophy hunting results in *additive mortality*, meaning that trophy hunting and even other human-caused mortality increases the total mortality to levels that far exceed what would occur in nature.<sup>29</sup> In fact, the effect of human persecution is “super additive,” meaning that hunter kill rates on large carnivores has a multiplier effect on the ultimate increase in total mortality over what would occur in nature due to breeder loss, social disruption and its indirect effects including increased infanticide and decreased recruitment of their young.<sup>30</sup> When trophy hunters remove the stable adult mountain lions from a population, it encourages subadult males to immigrate, leading to greater aggression between cats and mortalities to adult females and subsequent infanticide.<sup>31</sup>

Biologists Wolfe et al. (2015) recommend that states manage mountain lions at a metapopulation level rather than at the single population level—which is critical for South Dakota’s tiny mountain lion population that is reliant on dispersers from Wyoming. They further add, “We recommend a conservative management approach be adopted to preclude potential over-harvest in future years.”<sup>32</sup> Instead, South Dakota’s mountain lions experience *additive* levels of mortality.<sup>33</sup> Extensive research shows that this additive mortality caused by high levels of hunting results in population sinks.<sup>34</sup> High hunting mortality does not result in decreased numbers and densities of mountain lions because of compensatory emigration and immigration responses, typically by dispersing subadult males.<sup>35</sup>

- B. *Trophy hunting is particularly harmful to kittens and their mothers:* In heavily hunted populations, female mountain lions experience higher levels of intraspecific aggression (fights with other cats) resulting in predation on themselves and their kittens.<sup>36</sup> Over-hunting harms a population’s ability to recruit new members if too many adult females are removed.<sup>37</sup> A Utah study shows that trophy hunting adult females orphans their kittens, leaving them to die of dehydration, malnutrition, and/or exposure.<sup>38</sup> Kittens are reliant upon their mothers beyond 12 months of age.<sup>39</sup>
- C. *Trophy hunting harms entire mountain lion communities:* A recent study on mountain lions shows that mountain lions are quite social and live in “communities,” with females sharing kills with other females, their kittens and even with the territorial males. In return for these meals, the adult males protect the females and their kittens from incoming males.<sup>40</sup> Disrupting these communities leads to deadly



intraspecific strife, including infanticide and social chaos within the family groups.<sup>41</sup> Trophy hunting destabilizes mountain lion populations, which may cause increased conflicts with humans, pets and livestock.<sup>42</sup>

- D. *Trophy hunting is unnecessary, as mountain lions are a self-regulating species:* Mountain lions occur at low densities relative to their primary prey, making them sensitive to bottom-up (prey declines) and top-down (human persecution) influences.<sup>43</sup> Their populations necessarily stay at a much smaller size relative to their prey's biomass or risk starvation.<sup>44</sup> They do this by regulating their own numbers.<sup>45</sup> When prey populations decline, so do mountain lion populations.<sup>46</sup> Mountain lion populations also require expansive habitat, with individual cats maintaining large home ranges that overlap with one another.<sup>47</sup>
- E. *Killing large numbers of mountain lions halts their ability to create trophic cascades in their ecosystems, which benefits a wide range of flora, fauna and people:* Mountain lions serve important ecological roles, including providing a variety of ecosystem services.<sup>48</sup> As such, conserving these large cats on the landscape creates a socio-ecological benefit that far offsets any societal costs.<sup>49</sup> Their protection and conservation has ripple effects throughout their natural communities. Researchers have found that by modulating deer populations, mountain lions prevented overgrazing near fragile riparian systems, resulting in greater biodiversity.<sup>50</sup> Additionally, carrion left from mountain lion kills feeds scavengers, beetles, foxes, bears and other wildlife species, further enhancing biodiversity.<sup>51</sup>
- F. *Hound hunting is harmful to mountain lions, hounds and non-target wildlife:* Using radio-collared trailing hounds to chase mountain lions and bay them into trees or rock ledges so a trophy hunter can shoot them at close range is unsporting, unethical and inhumane.<sup>52</sup> Hounds kill kittens, and mountain lions often injure or kill hounds.<sup>53</sup> The practice is exceedingly stressful and energetically taxing to mountain lions.<sup>54</sup>

To escape from the hounds, mountain lions use evasive maneuvers such as running in figure eights, scrambling up trees or steep hillsides and using quick turns to evade the pursuing pack of barking hounds. As a result, mountain lions could exceed their aerobic budgets causing their muscles to go anaerobic—while hounds are capable of running a steady pace with little ill effect.<sup>55</sup> For every one minute the hounds chased a mountain lion, it cost the cat approximately five times what would have been expended if the cat had been hunting. A 3.5-minute chase, according to Bryce et al. (2017), likely equaled 18 minutes of energy the mountain lion would have expended on hunting activities necessary to find prey.<sup>56</sup>

Hounding is not considered “fair chase” hunting by most.<sup>57</sup> Fair chase hunting is predicated upon giving the animal an equal opportunity to escape from the hunter.<sup>58</sup> The use of hounds provides an unfair advantage to trophy hunters who rely on hounds to do the bulk of the work in finding and baying a mountain lion. GFP Wildlife Program Administrator Andrew Norton stated to the Commission in 2023, “As you can imagine, success is much higher with hounds. We see on average about twenty times as high success when hounds are used compared to boot hunting in South Dakota.”<sup>59</sup> In Custer State Park, hunters relying on hounds experience an astounding 63% success rate in killing mountain lions, compared to a success rate of 3.5% for boot hunters.<sup>60</sup> Hounds also chase and stress non-target wildlife, from porcupines to deer,<sup>61</sup> cause adverse interactions with bystanders, and trespass onto private lands.<sup>62</sup>



Grignolio et al. (2011) found that hounding was highly costly to non-target deer. Hounding changed deer behaviors, including deer inside a protected refuge.<sup>63</sup> While the hounds were chasing other species, they caused non-target deer, especially younger animals, to panic and huddle in an inferior habitat (in this case: a protected, high-elevation, snow-covered reserve during the wintertime hunting season when foraging was difficult). Hounds also significantly increased deer home range sizes—meaning deer had to expend extra energy to distance themselves from the hounds. Furthermore, Grignolio et al. (2011), citing several others, indicated that hounding highly disturbs deer, likely reducing individual fitness and reproductive success while harming deer populations on the whole. If GFP’s conservation goals include conserving deer populations, then unleashing packs of loose dogs in their habitat to spook, harass, and chase wildlife during a sensitive time of the year is quite counter to that goal.

## **2. Hunting mountain lions does not boost prey populations**

Research shows that ungulates are ultimately limited more by their food resources and other habitat factors (“bottom-up” limitations) than by their predators (“top down” regulators).<sup>64</sup> However, when herds lose their predators, they suffer poorer health and body condition, as well as more degraded habitats.<sup>65</sup> With a healthy assemblage of native carnivores, ecosystems enjoy the benefits from top-down regulation, which increases the health of ungulate herds with which they are integrally coevolved.<sup>66</sup>

The best available science demonstrates that killing native carnivores to increase ungulate populations is unlikely to produce positive results. Numerous recent studies demonstrate that predator removal actions “generally had no effect” in the long term on ungulate populations.<sup>67</sup> Because ecological systems are complex, heavily persecuting mountain lions will fail to address the underlying malnutrition problems that deer face. Research also shows that disruption by oil and gas drilling does, in fact, greatly harm mule deer populations.<sup>68</sup> If South Dakota wants to grow its ungulate populations, then GFP must foster survival of adult female mule deer and elk to stem declines; and it must improve nutritional conditions for ungulates as these factors are the most important for mule deer survival.<sup>69</sup> It must also eliminate hound hunting of mountain lions as it is an unnatural stressor on deer.<sup>70</sup>

Persecuting mountain lions will not help bighorn sheep recruitment, either. It is clear from the literature that bighorn sheep populations are in decline in the U.S. because of unregulated market hunting, trophy hunting, disease from domestic sheep,<sup>71</sup> resource competition by livestock, and loss of habitat.<sup>72</sup> Sawyer and Lindzey (2002) surveyed more than 60 peer-reviewed articles concerning predator-prey relationships involving bighorn sheep and mountain lions, concluding that while predator control is often politically expedient, it often does not address underlying environmental issues including habitat loss, loss of migration corridors, and inadequate nutrition.<sup>73</sup> The best available science suggests that persecuting mountain lion populations is not a solution for enhancing bighorn sheep numbers. That is because mountain lion predation upon bighorn sheep is a learned behavior conducted by a few individuals who may not repeat their behavior.<sup>74</sup> Similar behavior has been documented on endangered mountain caribou in the southern Selkirk Mountains, where trophy hunting disrupted sensitive mountain lion communities, female lions took to higher altitudes to avoid incoming, infanticidal young males, and preyed upon mountain caribou there.<sup>75</sup>

South Dakota can better plan for bighorn sheep management by selecting relocation sites for bighorn sheep that have little stalking cover.<sup>76</sup> Escape terrain that contains cliffs, rocks, and foliage makes excellent ambush cover for a mountain lion and should be avoided.<sup>77</sup> The amount of mountain lion predation is also generally greater on



small-sized bighorn sheep populations (those with fewer than 100 individuals) than on other larger bighorn sheep populations.<sup>78</sup> A host of authors reviewed by McKinney et al. (2006) and Ruth and Murphy (2010) recommend only limited mountain lion removals to benefit bighorn sheep populations.<sup>79</sup>

### **3. Mountain lions provide significant ecosystem benefits to their prey and other wildlife, as well as economic benefits to South Dakotans**

Mountain lions help prevent deadly deer-vehicle strikes<sup>80</sup> that can result in numerous human mortalities and pose significant financial and ecological costs to society.<sup>81</sup> In fact, by reducing vehicle collisions with deer, mountain lions saved drivers \$1.1 million in collision costs annually in South Dakota.<sup>82</sup> Additionally, highways fragment wildlife habitats, which can lead to both genetic inbreeding problems and direct mortality from vehicle collisions.<sup>83</sup> The cost of vehicle-animal collisions can be mitigated with the construction of highway structures that are designed to draw specific species such as deer across them, not only preventing vehicle strikes but protecting species and people while saving millions of dollars annually.<sup>84</sup>

Moreover, mountain lions help maintain the health and viability of ungulate populations by preying on sick individuals, reducing the spread of disease such as chronic wasting disease (CWD) and brucellosis.<sup>85</sup> For example, during a study in Rocky Mountain National Park, researchers found mountain lions preyed on deer infected with CWD.<sup>86</sup> The study concluded that adult deer preyed upon by mountain lions were more likely to have CWD than deer shot by hunters. According to the study, “The subtle behaviour changes in prion-infected deer may be better signals of vulnerability than body condition, and these cues may occur well before body condition noticeably declines.”<sup>87</sup> This demonstrates that mountain lions select for infected prey and may be more effective at culling animals with CWD, including during the early stages of the disease when they are less infectious, than hunters who rely on more obvious signs of emaciation that occur in later stages of the disease, when they are more infectious. Moreover, the mountain lions consumed more than 85% of carcasses, thereby removing a significant amount of the disease from the environment.<sup>88</sup>

This ecosystem benefit is increasingly important as CWD infection continues to grow in prevalence and distribution in South Dakota<sup>89</sup> and neighboring states. Hammering our state’s mountain lion population through extremely high and irresponsible levels of trophy hunting relative to the estimated population, and the setting of an arbitrarily low population objective for mountain lions, undermine one of our best defenses against the spread of this deadly disease.

### **4. Trophy hunting increases human-mountain lion conflict and livestock losses**

Trophy hunting and predator control of mountain lions results in increased conflicts because lions’ social structure are destabilized.<sup>90</sup> A review of predator-removal studies found that the practice is “typically an ineffective and costly approach to conflicts between humans and predators” and, as a long-term strategy, will result in failure.<sup>91</sup> Instead, the authors concluded, non-lethal alternatives to predator removal, coupled with coexistence (husbandry techniques) may resolve conflicts.<sup>92</sup>

A Washington state study shows that as mountain lion complaints increased, wildlife officials lengthened seasons and increased quotas to respond to what they believed was a growing lion population. However, the public’s perception of an increasing population and greater number of livestock depredations was actually the result of a declining female and increasing male population.<sup>93</sup> Heavy hunting of mountain lions skewed the ratio



of young males in the population by causing compensatory immigration and emigration, even though it resulted in no net change in the population.<sup>94</sup>

Study authors found that the trophy hunting of mountain lions to reduce complaints and livestock losses had the opposite effect. Killing mountain lions disrupts their social structure and increases both complaints and livestock losses.<sup>95</sup> Peebles et al. (2013) write:

... each additional cougar [i.e. mountain lion] on the landscape increased the odds of a complaint of livestock depredation by about 5%. However, contrary to expectations, each additional cougar killed on the landscape increased the odds by about 50%, or an order of magnitude higher. By far, hunting of cougars had the greatest effects, but not as expected. Very heavy hunting (100% removal of resident adults in 1 year) increased the odds of complaints and depredations in year 2 by 150% to 340%.<sup>96</sup>

Similarly, a study published recently shows the very same result – lethal removal of mountain lions is associated with increased conflicts, especially on small hoofstock including sheep and goats.<sup>97</sup> Dellinger et al. (2021) state:

Removals can thus create a negative-feedback loop that leads to increasing conflict and lethal removal, which could begin to negatively impact the mountain lion population via reduced gene flow and population viability (Hiller et al. 2015, Vickers et al. 2015, Benson et al. 2019). Thus, maintaining an older age structure by reducing lethal removal of resident adults could mitigate depredations (Logan 2019).<sup>98</sup>

Hunting disrupts mountain lions' sex-age structure and tilts a population to one that is composed of younger males, who are more likely to engage in livestock predation than animals in stable, older populations.<sup>99</sup> In 2019, the Humane Society of the United States published a report on livestock losses from mountain lions using the U.S. Department of Agriculture's data.<sup>100</sup> For South Dakota's cattle and sheep ranchers, 2015 data show that most livestock losses came from illnesses, birthing problems, weather and theft, with far fewer losses coming from native carnivores and domestic dogs combined.<sup>101</sup> In 2015, nearly 96% of unwanted cattle losses in South Dakota were from maladies with only 0.17% coming from mountain lions, according to the USDA.<sup>102</sup> And USDA data show that in 2014, zero sheep were lost to mountain lions in South Dakota.<sup>103</sup>

Rather than allowing mountain lion trophy hunting, GFP must make a concerted effort to utilize non-lethal methods (described below) when rare conflicts occur, prioritizing these tools above lethal removal of mountain lions. The current reliance on lethal removal of mountain lions that enter a human community is cruel, unsustainable, and not in line with best management practices for mountain lion conservation.<sup>104</sup> A recent Utah study found that mountain lions selected for native prey even within urban-wildland interface habitat, with only 2% of 540 prey animals consisting of domestic animals.<sup>105</sup> Techniques such as hazing and relocation are viable options that prevent unnecessary killing and are largely supported by the majority of South Dakotans, as detailed within the Plan.<sup>106</sup> According to surveys of South Dakota residents in 2018, public education, relocation and hazing are by far the most widely supported methods for addressing human, pet and livestock conflicts with mountain lions.<sup>107</sup>

Furthermore, GFP must work with livestock owners to ensure they are adequately and appropriately employing nonlethal predator deterrence techniques. Installing predator-proof enclosures, using livestock guardian animals, or utilizing frightening devices are all effective strategies to prevent conflicts with mountain lions and





other carnivores. Other livestock husbandry practices are also essential at reducing conflicts with carnivores. Livestock operators should:

- Practice sanitary livestock carcass removal to avoid scavenging and habituation.
- Keep livestock, especially in maternity pastures, away from areas where wild cats have access to ambush cover.<sup>108</sup>
- Keep livestock, especially the most vulnerable—young animals, mothers during birthing seasons and hobby-farm animals—behind barriers such as electric fencing and/or in barns or pens, or kennels with a top.<sup>109</sup> The type of enclosure needs to be specific to the native carnivore to prevent climbing, digging or jumping.<sup>110</sup>
- Move calves from pastures with chronic predation problems and replace them with older, less vulnerable animals.<sup>111</sup>
- Concentrate calving season (i.e., via artificial insemination) to synchronize births with wild ungulate birth periods.<sup>112</sup>
- In large landscapes, use human herders, range riders and/or guard animals.<sup>113</sup> Guard dogs work better when sheep and lambs are contained in a fenced enclosure rather than on open range lands where they can wander unrestrained.<sup>114</sup>
- Suspended human clothing, LED flashing lights (sold as “Foxlights”) and radio alarm boxes set off to make alarm sounds/noises near pastures are some of the low-cost sound and/or visual equipment that deters wild cats.<sup>115</sup>
- Studded leather collars can be very effective at protecting cattle from big cats.<sup>116</sup>

According to USDA data from 2015, only an estimated 11.2% of cattle and calf operations in South Dakota used any nonlethal predator control methods.<sup>117</sup> Expanding the use of suitable techniques that are landscape and animal specific is essential to reducing conflicts and preventing the death of livestock as well as wild carnivores. We urge GFP to focus resources on further educating the public on how to share the landscape with carnivores, rather than only attempting to maximize trophy hunting opportunity.

##### **5. Trophy hunting of mountain lions is not economically sound or supported by the majority of Americans who want to see wildlife protected**

Trophy hunting of mountain lions is not in the best interest of this iconic species, nor does it represent the interests of the public majority. The practice deprives citizens of their ability to see, view tracks of, or photograph wild mountain lions, and deprives them of the important ecosystem services mountain lions provide in our landscapes. Nonconsumptive users are a rapidly growing stakeholder group that provides immense economic contributions to the communities in which they visit.<sup>118</sup> The U.S. Fish and Wildlife Service’s 2016 survey on wildlife recreation indicates that wildlife watchers nationwide have increased 20 percent from 2011, numbering 86 million and spending \$75.9 billion, while all hunters declined by 16 percent, with the biggest decline in big game hunter numbers, from 11.6 million in 2011 to 9.2 million in 2016.<sup>119</sup> Altogether, hunters spent \$25.6 billion in 2016, about one-third that spent by wildlife watchers (Fig. 2).<sup>120</sup>



<b>Figure 2: Wildlife recreation participation &amp; expenditures, 2011 vs. 2016 data</b>			
<b>Numbers</b>	<b>2011</b>	<b>2016</b>	<b>Change</b>
<b>Wildlife watchers</b>	71.8M	86.0M	+14.2M (+20%)
<b>All hunters</b>	13.7M	11.5M	-2.2M (-16%)
Big game	11.6M	9.2M	-2.4M (-20%)
Small game	4.5M	3.5M	-1M (-22%)
Migratory birds	2.6M	2.4M	-0.2M (-8%)
Other animals	2.2M	1.3M	-0.9M (-41%)
<b>Expenditures</b>	<b>2011</b>	<b>2016</b>	<b>Change</b>
<b>Wildlife watchers</b>	\$59.1B	\$75.9B	+\$16.8B (+28%)
<b>All hunters</b>	\$36.3B	\$25.6B	-\$10.7B (-29%)

The public values mountain lions and views them as an indicator of healthy environments while posing little risk to people living near them.<sup>121</sup> A new study indicates that Americans highly value wildlife, including top carnivores such as mountain lions, and are concerned about their welfare and conservation.<sup>122</sup> The landmark America’s Wildlife Values report found that the percentage of South Dakotans who fall into the traditionalist values system – those who view wildlife as a resource to be used for human benefit – decreased by four percent between 2004 and 2018, while the percent of mutualists – those who value living alongside wildlife - rose significantly, with an increase of 7.5% in the same time period.<sup>123</sup> South Dakotans increasingly value their wildlife alive and thriving. Surveys also show that the majority of Americans do not support trophy hunting.<sup>124</sup> An additional study showed that most believe mountain lions are the best representative of the Southern Rockies heritage and landscape.<sup>125</sup> A continued trophy hunting and hounding season is not in the best interest of South Dakotans who prefer that these large cats remain on the landscape, without threat of persecution.

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<sup>118</sup> M. L. Elbroch et al., "Contrasting Bobcat Values," *Biodiversity and Conservation* (2017); U.S. Fish and Wildlife Service, "2016 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation: National Overview," ed. U.S. Fish and Wildlife Service (2017).

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Dear SD GFP Commission,

Prairie Hills Audubon Society objects to the reduction in the population objectives for cougars. We think you should be cooperating with tribes to inventory the cougar populations on their lands and cooperating with them on goals for cougar management in overlapping zones of tribal cougar populations that can have cougars with territories in both GFP and tribal jurisdictions. We object to maximizing hunting being a core objective and to minimizing complexity of hunting seasons. We think the license fees should be much higher than \$24.

**1. We object to reducing the population objective from 300-200 cougars to 250-150**

**cougars.** This will result in a population decline. It will be over hunting of cougars. Excessive cougar hunting increases conflicts with humans/livestock. It will increase orphaning of and infanticide of kittens. It will reduce the number of cougars sent out as migrants to re-populate other areas to the east of us. It will be less cougars for wildlife watchers to watch. It will reduce the role of an apex predator and keystone species. It will result in less killing of sick prey animals by cougars.

**2. We support managing for a stable or source population of cougars in the Black Hills.** If we have a sink population then we draw in cougars from other states. With a source population, then our cougars can emigrate & help recover extirpated cougar populations, where suitable habitat exists across the USA. (A cougar from the Black Hills was killed in Connecticut)

**3. We support managing for some viable populations of mountain lions on the prairie unit (outside the BH Fire Protection District) where the habitat is suitable and we support maintaining connectivity corridors to such populations from the Black Hills. We support iGFP helping to inventory these populations – if tribes wish for help.** There are breeding populations on at least 2 Reservations (Oglala Sioux Tribe & Rosebud Sioux Tribe) and there could be resident lions at more reservations. Habitat could exist along some rivers and at Custer Gallatin National Forest's units in SD.

GFP needs to learn about and to treat Reservation wildlife objectives with respect. Small cougar populations need resupply from other populations to keep genetic diversity. Checker board ownership and mixed jurisdictions on or near reservations happened due to historic Allotment Acts and reduction in reservation sizes by courts. Male lion territories can be 400 square miles. SDGFP lion policy can impact Reservation policies.

**4. We oppose unlimited harvest, year-long on the prairie unit, using hounds.**

**5. We oppose hound hunting of mountain lion, especially on public land.** (Talking points against hound hunting – <https://phas-wsd.org/wp-content/uploads/Hound-hunting-objections.pdf> )

**6. We object to your goal to “manage mountain lion populations for both maximum and quality hunting opportunities considering all social and biological inputs” .** (*Emphasis added*)

This makes biological and ecological functions secondary to providing humans with hunting recreation. Lions are an apex predator and a keystone species. Hunting means killing animals, who may suffer before death, bleeding out from bullet or arrow - this is to be our primary goal for cougar management?

This ignores that hunting is much less popular than wildlife watching and a dead lion can't be watched. For more information on relative popularity of hunting vs wildlife watching visit: <https://phas-wsd.org/wp-content/uploads/WildlifeWatcher.v.hunters9.2024.pdf> – Or compare expenditures for hunting v. wildlife watching: <https://phas-wsd.org/wp-content/uploads/COMPARING-EXPENDITURES-WW-Hunt.pdf>

Mountain lions give birth year-around and thus cougar hunting will always be orphaning kittens. Kittens live with mom for about 18 months. Implicit in cougar hunting is orphaning kittens to starve to death, be killed by predators, male lions or survive for a while with inadequate training after loss of their mom & perhaps have more conflicts with people. Link to learn more about orphaning kittens – see when they are born – <https://phas-wsd.org/wp-content/uploads/WHEN-DO-MOUNTAIN-LIONS-GIVE-BIRTH2.docx>

Over hunting of cougars results in increased conflicts with humans/livestock. The male population increases relative to females. Young males migrate in and replace older more experienced lions that were killed. The young males are more likely to prey on livestock than older experienced lions and to move around more – for more info watch this You/tube video: [https://www.youtube.com/watch?v=2\\_ZD-PAKhSo](https://www.youtube.com/watch?v=2_ZD-PAKhSo)

Mountain lions remove sick prey animals.

**7. We object to a goal of “Modify and adopt hunting season structure as needed to minimize regulation complexity“** (*Emphasis added*) Staff will use that argument to refute any proposed changes to hunting rules for that we ask for, for animal welfare reasons – alleging that the changes will make regulations more complex. Here are some petitions for rule-making that PHAS submitted to mitigate hound hunting that were denied <https://phas-wsd.org/wp-content/uploads/Denied-petitions-to-mitigate-hound-hunting-of-lions.pdf>

Any rules approved by SDGFP are designated as not animal cruelty by state statute – SDCL 40-1-17, <https://sdlegislature.gov/Statutes/40-1-17>

**8. We object to hunting mountain lions to maximize the numbers of prey population (such as deer and elk) so that more prey animals will be available for hunters to kill.**

**9. Cougars remove sick animals from ecosystem.** Studies show that cougars don't catch chronic wasting disease (CWD) when they eat an infected ungulate:

<https://pubmed.ncbi.nlm.nih.gov/34753180/>. Captive cougars have been fed meat infected with CWD and they don't pass on most of the prions in their ██████. Only 2.8 to 3.9% of input CWD prions remain after passage through the mountain lions' gastrointestinal tracts:

<https://pubmed.ncbi.nlm.nih.gov/34878289/>

Here is a 2024 summary of literature: <https://catsarenttrophies.org/wp-content/uploads/2024/08/Natures-Check-Against-Disease-Report-08-21-24.pdf>

10. **We question allegations that there are increased sightings of cougars or increased intrusion of cougars to human spaces.** This is just allegations by some individuals. In it's July 2024 data presentations on cougars, SDGFP did not update most of 2023 data charts it had provided with data on cougars. However, the data that was displayed to the public in the fall of 2023 did not show people reporting increased sightings of cougars to GFP nor did it show an increased killing of "conflict cougars". Thus no statistical evidence has been offered by GFP or others to prove increased interactions by cougars with humans/livestock in 2024.

11. We ask for **increased fees** for mountain lion hunting licenses, especially if hounds are used. The current cost is \$22. We suggest \$43 dollars for "boot hunting" license & \$63 dollars for hound hunting license. Hound hunters are more likely to be successful than boot hunters. Folks could ask for more expensive licenses. We actually asked for more cost in a petition for rule-making, that the Commission rejected: [https://gfp.sd.gov/UserDocs/lion\\_fees\\_rule\\_change\\_petition\\_Final.pdf](https://gfp.sd.gov/UserDocs/lion_fees_rule_change_petition_Final.pdf).

Sincerely,



Nancy Hilding





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Date: October 1, 2024

To: SD Game, Fish & Parks Commission

Re: Fee Adjustments

Dakota Trout Unlimited understands that license and user fees are used to support recreational and wildlife conservation activities in South Dakota. Because there has not been an increase in license and user fees since 2014, it would seem that revenue from license sales and user fees has not kept pace with increasing costs.

Dakota Trout Unlimited supports the fee adjustments proposed by South Dakota Game, Fish, and Parks. We feel that the increased revenue generated by these fee adjustments will provide needed funds to allow Game, Fish, and Parks to better serve the state of South Dakota in a way that aligns with the mission of Dakota Trout Unlimited to preserve South Dakota's cold-water fisheries.

Respectfully,

Board of Directors

Dakota Trout Unlimited