Dear Commissioners,

On behalf of our members and supporters in South Dakota and throughout the United States, the Mountain Lion Foundation vehemently opposes the proposed amendments to South Dakota's hunting regulations which will increase the hunting quota and extend the length of the 2013 mountain lion hunting season, and respectfully requests that the South Dakota Game, Fish and Parks Commission consider the ramifications of its actions on the health and sustainability of South Dakota's mountain lion population.

We understand South Dakota Department of Game, Fish and Parks' (SDGFP) explanation of how it developed its revised lion population estimate for the Black Hills region of the state, however we reject the conclusions. The Department has obviously "cherry-picked" isolated methodologies and conclusions from multiple studies and has pieced together a hypothesis which does not take into consideration any of the negative results reported in those same studies. SDGFP's latest lion population model would not pass any reputable scientific peer review process.

(over)
Furthermore, even if SDGFP’s revised lion population estimate were accurate, the proposed mortality levels for the 2013 lion hunting season would be too excessive. A population of 300 lions is too small to withstand the proposed level of hunting mortalities when coupled with natural attrition rates.

Allowing the killing of 80 percent of your state’s estimated adult female population would be considered by any credible biologist as negligent.

South Dakota’s Game, Fish and Parks Commissioners have an obligation under the public trust doctrine to ensure the sustainability of South Dakota’s mountain lion population. This obligation isn’t limited to just South Dakota’s hunting or ranching community, but is to all Americans no matter where they reside. Approval of the proposed lion hunting amendments would violate this obligation and will increase the potential for extirpation of mountain lions in South Dakota, repeating the errors of 100 years ago.

Because of the critical importance of South Dakota’s mountain lion population to the reestablishment of the species throughout its historic range, the Mountain Lion Foundation formally requests that the South Dakota Game, Fish and Parks Commission not only reject the proposed lion hunting amendments, but also cancel the 2013 mountain lion hunting season until such time as new peer-reviewed population and mortality studies and models have been completed and presented for public review.

Last month, the Mountain Lion Foundation posted a petition on its website (www.mountainlion.org) calling for the cancellation of South Dakota’s 2013 mountain lion hunting season until new peer-reviewed population and mortality studies have been completed and presented for public review. To date we have received 404 responses. Included in an accompanying document are the terms of that petition as well as a listing of the names and locations of all respondents. Copies of the individual emails will be made available upon request from the South Dakota Department of Game, Fish and Parks; members of its Commission; or any member of the South Dakota Administration or Legislature.

Thank you for considering our comments.

Sincerely,

Tim Dunbar
Executive Director