

Nancy Hilding
 President
 Prairie Hills Audubon Society
 P.O. Box 788
 Black Hawk, SD 57718
 phas.wsd@rapidnet.com
 March 30th, 2025

SD Game, Fish and Parks Commission
 523 Capitol Ave
 Pierre, SD 57501

Dear Commission,

First Section:
ADDITIONAL RULE CHANGE SUGGESTED.

With this rule change you will be increasing the area in SD subject to hound hunting of cougars, thus you should be increasing the animal welfare provisions.

LACTATING FEMALES

Rule # 41:06:61:06. 7, shows some protection to a lactating females, that hounds have treed, but that protection exists only if it is the first lion treed & the lion is in Custer State Park. Quote of section 7:

“In Custer State Park, a person using dogs shall attempt to harvest the first legal mountain lion they have a reasonable opportunity to harvest, except under the condition where the lion pursued shows obvious signs of lactation.” (emphasis added)

This protection should be improved to apply to all areas of hound hunting. Please add an entirely new rule saying: hound hunters of lions must not harvest a lactating female lion that they have treed or otherwise cornered with hounds.

PRAIRIE UNIT NAME

Please make a rule change to give a name to the hunting unit that is the rest of SD “outside of the Black Hills Fire Protection District.” We suggest the Prairie Unit, as you once used that name for that area.

DIVIDE UP THE PRAIRIE UNIT

Oglala Sioux Tribe (OST) and Rosebud Sioux Tribe (RST) have proof of cougar breeding. OST has a lion hunting season (harvest limit 20 any sex/10 females). Cheyenne River Sioux Tribe (CRSt) may have resident lion(s), without proof of breeding. Yankton Sioux Tribe (YST), circa 2015, thought they had a couple of breeding mountain lions, but later on did not think they had any anymore and I don't know what their recent/current population is.

We think that GFP should split off area(s) east of Black Hills, South of I 90 and west of Yankton Sioux Tribe & create hunting unit(s) that prioritizes cooperation with tribes in the management of lions in the unit(s), if the tribes agree with that idea.

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Second section

WE OBJECT TO HOUND HUNTING ON PUBLIC LAND IN THE PRAIRIE UNIT:

We object to the proposed rule change to allow hound hunting of mountain lions to occur both on public and private land.

You are changing this rule:

Rule # 41:06:61:06 (5) The use of dogs to hunt mountain lions is allowed only during those specified hunting intervals in Custer State Park that allow the use of dogs; and year-round outside of the Black Hills Fire Protection District ~~when on private land, with permission of the landowner or lessee. However, a pursuit of a mountain lion by dogs that originates on private land may cross over or culminate on private land, with permission from the landowner or lessee, or on public land, unless expressly prohibited by the managing entity;~~

REASONS:

1. Dogs are designed for long chases while mt. lions are designed for short bursts of speed and when threatened or tired, they climb trees/rocks. On the prairie unit, trees and rocks may be lacking for a lion pursued by dogs to climb up & this could result in fights between dogs/lions.
2. Small populations need connectivity corridors to resupply the population with fresh genetics. Aggressive hound hunting could endanger that connectivity.
3. Nebraska, which lies below the Reservation breeding populations, last year doubled its' cougar harvest limits for it's 3 cougar hunting areas. Thus, Reservation populations may be losing some supply of lions from the south. More aggressive hound hunting in SD may also effect their populations
4. SDGFP does not require hound hunters to have e-collars, thus control of dogs in SD does not use the best available technology.
5. There are not that many hound hunters relative to boot hunters. Hound hunters outperform boot hunters. The harvest from Custer State Park and the Prairie Unit is mostly taken by hound hunters. The ratio of lion kill by hound hunters is excessive relative to their numbers, when compared with number of boot hunters.
6. Custer-Gallatin National Forest could support breeding lions and back in mid 1990s FS employees saw mom w/cubs. Why can't people who don't hunt, enjoy viewing lion tracks, or seeing lions or just knowing that public lands have apex predators. Aggressive hound hunting will destroy small populations.
9. Various river corridors (Such as Niobrara River in NE) can support lions. We might have lion habitat along Missouri River. Aggressive hound hunting will destroy small populations
10. Mountain lion pursuit with hounds is cruelty to lions and dogs.
11. Mountain lion pursuit with hounds will result in more trespassing.
12. Mountain lion pursuit with hounds will create disturbance to people, livestock and wildlife (including mule deer). Disturbance of wildlife can stress them.
13. Mountain lion pursuit with hounds will stress lions, especially in heavy snow or extreme heat, which will be especially hard for mothers with young.
14. Mountain lion kittens stay with moms for 18 months and moms can give birth any time of the year. Hound hunters may separate moms from kitten leaving their kittens unprotected or unfed.
15. Mountain lion pursuit with hounds is not fair chase.
16. Mountain lion hunting with hounds is more efficient than "boot hunting" and will result in less lions available for "boot hunters" (hunters not using dogs).

17. Mountain lion hunting by hounds will result in more commercialization of hunting, as some hound hunters will be hired as guides/outfitters. People with money to hire dogs, will thus be more likely to get a lion than those who can't afford such.

Please don't change the rule to allow hound hunting on public land in the prairie.

Sincerely,

A handwritten signature in black ink, appearing to read "Nancy Hilding", with a stylized flourish at the end.

Nancy Hilding
President
Prairie Hills Audubon Society