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SD Game, Fish and Parks
 523 E. Capitol Ave.,
 Pierre, S.D. 57501,
<https://gfp.sd.gov/forms/positions/>

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

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 shit. 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.

Sincerely,



Nancy Hilding