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PINE RIDGE

We think the Pine Ridge population estimate is now 70 lions of either sex and all ages. Kittens typically make up about 33% of a population or in Pine Ridge's case - 23.1 lion kittens, so adult/sub-adult population is 57 lions.

We assume an intrinsic cougar population growth rate of 11%-17% of the adult/sub-adult cougar population. Thus, Pine Ridge would have an annual intrinsic growth of 6.27 – 9.69 cougars, which is smaller than your harvest cap of 12 lions of either sex. You are supposed to include other human caused deaths besides hunting, so hunting can't take all 9.7 cougars.

So, we believe you should be hunting less than 12 lions of both sexes and 6 females in 2025.

NIOBRARA MT. LION UNIT

Based on your 2025 booklet, you now would have had 34 mountain lions in

the Niobrara Unit, but you must subtract 4 recent deaths, so you actually have 30 cougars of all age categories – i.e.: kittens, adults and sub-adults. Kittens typically make up about 33% of a population or in Niobrara's case 9.9 kittens, so we assume 20 adult/sub-adults. The possible range of intrinsic growth (11%-17% of adult/sub-adult population) would be 2.2 to 3.4 lions to be allowed for all human caused mortality.

Because we want Niobrara to be a source or at least a stable population and so as to not experience the adverse issues associated with aggressive harvest rates, we request a "harvest" limit not greater than 3 adult/sub-adult mt. lions, which we believe to be harvest caps that might be within the possible range of intrinsic growth (11%-17% of adult/sub-adult population) - after you subtract for kittens and other human caused deaths.

WILDCAT HILLS MT. LION UNIT

We object to harvesting being allowed at Wildcat Hills at all in 2025. We think you just have 6 documented living lions at this point and propose to kill 3 of them. We think you need to skip the hunting season this year.

- January 2025: NGPC's mark-recapture survey tallied 18 living lions in the Wildcat Hills (an estimate even NGPC acknowledges is "likely biased")
- 2025 to date: 12 more confirmed deaths (presumably including the 3 killed in January during this year's hunt).

That means up to 12 of the 18 lions counted in January are already gone. Add in the earlier 9 deaths and we see **21 mortalities in just 17 months**—an unprecedented hit. No evidence/data is provided to support the wishful thinking that "immigration from neighboring populations" will replenish this loss, particularly when neighboring states like WY are considering significant increases in *their* mountain lion "harvests."

SOUTH DAKOTA RESERVATION COUGAR POPULATIONS

The Pine Ridge Ecosystem extends from Nebraska into South Dakota and Wyoming. South Dakota now has a cougar breeding population and a

hunting season on the Oglala Sioux Tribe lands (Pine Ridge Reservation). The Oglala Sioux Tribe has a year-long season with a harvest limit of 20 lions either sex or 10 female lions. It allows hound hunting. Rosebud Sioux Tribe also has breeding and resident lions and the Tribal Council in 2023 adopted a hunting season of 5 mt lions either sex or 3 females, but to our knowledge, never implemented that season after they discovered conflicts between ordinances. However tribal members can hunt lions using a furbearer license.

We expect that the reservation and northern Nebraska populations are related to each other and changes to either effect the others.

UNINTENDED CONSEQUENCES OF COUGAR HUNTING

We believe that mountain lions regulate their own population sizes. The older, adult males evict or kill the extra sub-adult males. Human management is not needed to provide for healthy and resilient mountain lion populations.

We believe that scientific research has shown that excessive sport hunting of mountain lion results in the unintended consequence of shifting the sex/age structure towards younger males. This shift results in increased male lion densities when young males immigrate in, thus ironically not reducing the male population.

It also results in increased conflicts between humans, livestock and pets with lions, as younger males are more densely distributed and less experienced. It can also redistribute females with young kittens, who move away from young males to protect kittens from infanticide. Females can use different prey than males, and moving females can change what wildlife they eat, at least when their kittens are young. A 2012 video by Mr. Wielgus on these issues can be found at https://www.youtube.com/watch?v=2_ZD-PAKhSo

You also have some recent research in Nebraska that shows that coyotes killing of mule deer fawns lessens in the Pine Ridge, when compared to coyote fawn killing in areas of Nebraska without lions. This is because they scavenge mountain lion kills. So, the presence of mountain lions causes better fawn survival and the mule deer populations grow faster.

Mountain lions kill ungulates with chronic wasting disease and research in Wyoming shows they absorb a large percent of prions in their bodies without excreting the prions.

So, your desire to reduce conflicts with lions by recreational hunting, doesn't work if you kill too many of them. Your desire to increase prey species for hunters to kill by killing lions, may not work as you envision, in some instances.

PHAS POSITIONS

We object to hound hunting as cruelty to cougars and dogs. We object to it as not "fair chase" and a trespassing issue.

We want cougar populations in SD and NE managed as source populations so our states' smaller & disjunct populations can grow. We want new populations to be established in new states by immigration to the east, south and north.

Thanks

A handwritten signature in black ink, appearing to read "Nancy Wild". The signature is fluid and cursive, with a small flourish at the end.

President
Prairie Hills Audubon Society