



## AGENDA

### Game, Fish and Parks Commission

October 7-8, 2021

Cadillac Jacks – 360 Main St. Deadwood, SD

Zoom Video Conference (see below)

Livestream link <https://www.sd.net/>

This meeting will be held in person, via zoom/conference call, and livestream. To listen to the entire meeting beginning at 2:00 p.m. MT via livestream at <https://www.sd.net/>.

The public hearing followed by the open forum will begin at 2:00 p.m. MT on October 7. To provide comments join the meeting in person, via zoom or conference call per the info below. To conduct the open forum as efficiently as possible we ask those wishing to testify to **register by 1:00 pm MT by email to [Rachel.comes@state.sd.us](mailto:Rachel.comes@state.sd.us). Testifiers should provide their full names, whom they are representing, city of residence, and which proposed topic they will be addressing.**

Written comments can be submitted at <https://gfp.sd.gov/forms/positions/>. To be included in the public record comments must include full name and city of residence and meet the submission deadline of seventy-two hours before the meeting (not including the day of the meeting)

Click on the link below to the join Zoom Meeting. Depending on the application you use you may be required to enter the meeting ID and password. Remember to **enter your display name and mute your microphone**. To help keep background noise and distractions to a minimum, make sure you **mute your microphone and turn off your video** when you are not speaking.

#### THURSDAY

Zoom Meeting Link <https://state-sd.zoom.us/j/94710669351?pwd=RIVtNnFWdUtYZUtdUHRnUmFkWXNqZz09>

or join via conference call    Dial 1 669 900 9128    Meeting ID: 947 1066 9351    Password: 196938

#### FRIDAY

Zoom Meeting Link <https://state-sd.zoom.us/j/92993377687?pwd=M2JtRUV1MhFNeEhkVUpEKzNuTFR1Zz09> or

join via conference call    Dial 1 669 900 9128    Meeting ID: 929 9337 7687    Password: 786528

### Call to order 2:00 PM MT/3:00 PM CT

#### Division of Administration

##### Action Items:

1. Conflict of Interest Disclosure
2. Approve Minutes of the September 2021 Meeting  
<https://gfp.sd.gov/commission/archives/>
3. Additional Commissioner Salary Days

### Public Hearing 2:00 PM MT

Portion of the meeting designated for public comment on items pertaining to finalizations listed on the agenda *(Typically limited to 3 minutes per person.)*

### Open Forum

Portion of the meeting designated for public comment on other items of interest. *(Typically limited to 3 minutes per person)*

#### Division of Administration

##### Action Items (continued):

4. License List Request

**Administration Information Items:**

5. Go Outdoors SD Update
6. CanAm Ticket Sales
7. Pheasant Hunting Marketing and Public Relations
8. 605 Magazine Series on Habitat and Access
9. Rapid City Shooting Range Update

**Finalizations**

10. Park Entrance License Sale Date
11. Camping Fees
12. Park Check Out Time

**Division of Parks and Recreation**

Action Items:

13. Lewis and Clark Resort Collateral Assignment

Information Items:

14. LWCF Projects
15. Buffalo Round up and Trail Trek
16. Snowmobile Trails
17. Spring Creek Land Purchase
18. Low Water Access Issues
19. Cartegraph Update
20. Revenue, Camping and Visitation Report

**Division of Wildlife**

Information Items:

21. Newton Hills Boy Scout Land Acquisition
22. GPA Sales Update
23. Nonresident Waterfowl Season Structures
24. AIS Program Update
25. French Creek Temperature Study
26. EHD Update
27. Bighorn Sheep Update
28. License Sales Update

**Solicitation of Agenda Items from Commissioners**

**Adjourn**

Next meeting information: November 4-5, 2021 – Pierre

## **Minutes of the Game, Fish, and Parks Commission September 1-2, 2021**

Chairman Russell Olson called the meeting to order at 1:00 p.m. MT. Commissioners Julie Bartling, Travis Bies, Jon Locken, Stephanie Rissler, Doug Sharp, Charles Spring, Robert Whitmyre and Russell Olson were present. Public and staff were able to listen via SDPB livestream and participate via video conference or in person with approximately 60 total participants via zoom and 50 in person.

### **DIVISION OF ADMINISTRATION**

#### **Conflict of Interest Disclosure**

Chairman Olson called for conflicts of interest to be disclosed. None were presented.

Chairman Olson welcomed Rissler and Locken to the Commission

#### **Approval of Minutes**

Olson called for any additions or corrections to the July 8-9, 2021 regular meeting minutes or a motion for approval.

Motion by Bies with second by :Locken TO APPROVE THE MINUTES OF THE July 8-9, 2021 MEETING. Motion carried unanimously.

#### **Additional Commissioner Salary Days**

Olson called for additional salary days. Rissler submitted 2 salary days. Motion by Whitmyre with second by Sharp TO APPROVE THE SALARY DAYS AS REQUESTED. Motion carried unanimously.

#### **Rapid City Firearms Range – Project status**

John Kanta, terrestrial's chief, explained GFP is in the process of planning the finest outdoor shooting range ever constructed in South Dakota. The range will be constructed on 400 acres of property a few miles north of Rapid City. The cost of the property is approximately \$1 million, and the estimated cost of construction is \$10 million. GFP is actively seeking funding partners for this project. GFP intends to break ground spring of 2022 and complete construction by fall of 2022.

#### **Returned License Process**

Keith Fisk provided the commission information on the process to return a hunting license.

#### **Leadership Development Program**

Emmett Keyser, Regional Wildlife Supervisor and Jeff VanMeeteren, Regional Parks Supervisor shared information with the Commission regarding the Department's Leadership Development Training Program. The Leadership Training Program is being lead and delivered by Lumin Advantage, Inc., a small company out of the Twin Cities that specializes in delivering leadership training to government agencies. In mid-September, the Lumin staff will begin training the 3rd Cohort of the Leadership Development Program for the Department. Nineteen staff were initially selected from

the group of 26 applicants who sought to participate in the Leadership Development Training Program this year. One of those candidates selected recently took another position, so Cohort #3 will have 18 participants who will attend 6 individuals 2-to-3-day long training sessions. The training encompasses a total of 78 hours of class or online instruction that will take place over the coming months, with the final training session occurring in July 2022. About a year and a half ago, the Department of Transportation (DOT) engaged the same training provider, Lumin Advantage, so both the Department and DOT will again benefit from efforts to coordinate the scheduling and delivery of this leadership training.

### **Law Enforcement Section Update**

Sam Schelhaas, law enforcement chief, gave a brief update on the efforts of the law enforcement section. Schelhaas talked about the different challenges faced within the past year and focused primarily on the work of providing a safe and enjoyable experience within the sixty plus state park and recreation areas within the state. There were many uncertainties as the summer started but officers and managers came together to make the program successful. The focus of the summer of 2021 was establishing relationships between the officers and the managers and then providing adequate coverage in the park and recreation areas. Significant strides were made in both of these areas. Focus now is for the upcoming hunting seasons as we transition from summer into fall.

### **PUBLIC HEARING**

The Public Hearing began at 2:00 p.m. and concluded at 2:33 p.m. The minutes follow these Commission meeting minutes.

### **OPEN FORUM**

Jon Kotilnek, senior staff attorney, opened the floor for discussion from those in attendance on matters of importance to them that may not be on the agenda.

### **Park Entrance License Sale Date**

No verbal comments

### **Camping Fees**

No verbal comments

### **Park Check Out Time**

No verbal comments

### **Other**

Nancy Hilding, Prairie Hills Audubon Society – Black Hawk, SD – spoke regarding Commissioner inquiring about possible amendments to beavers season and doesn't see it in the minutes or on the agenda for this meeting. Says statute requires public access. The notice provides the URL to each rule and allow staff to make changes as a matter of form, but the public cannot.

Aaron Thompson, Spearfish Livestock Association - Spearfish, SD - landowner and rancher spoke regarding elk management plan and contingency tags. Provided

some history on drought contingency licenses based on science and data not public opinion. The 10 percent reduction is on the far end of conservative. Feels the amendment to the plan should be scrapped as it based off public opinion and not science. Finds the 20-tag recommendation insulting.

Kathleen Schmidt – Nemo, SD spoke regarding the Nest Predator Bounty Program as it is cruel and barbaric. Stated stats of the program saying this is not wildlife management and shouldn't be taught to children to kill animals. This allows the rodent population to explode, and the Commission should know that animals cannot speak for themselves. Why ask for public input when not taking it. Need to find better way to get people outdoors to promote biological diversity. Complaint about several seasons that should not be hunted.

## **FINALIZATIONS**

### **Bait Regulations, Private Hatchery and Tournaments**

Lott presented the recommended changes as follows:

1. Remove requirement for monthly and annual reporting by licensed retail bait dealers.
2. Remove size restrictions on trap entrance size and mesh size restriction for noncommercial bait seines, nets, and traps.
3. Eliminate annual fish health and AIS inspection requirement for private hatcheries.
4. Change the definition of fishing tournaments so that youth events with participants under the age of 18 (currently 17) would not be considered a tournament.

Motioned by Sharp, second by Rissler to APPROVED THE RECOMMENDED CHANGES TO THE BAIT, PRIVATE FISH HATCHERIES AND FISHING TOURNAMENT RULES. Motion carried unanimously.

### **Aquatic Invasive Species**

Lott presented the recommended changes to the aquatic invasive species rules as follows:

1. Create an exemption to the prohibition on possessing and transporting AIS for a shoreline property owner to transport aquatic invasive species for disposal, in a manner that minimizes possible introduction to new waters.
2. Create an exemption to prohibitions for launching a boat, dock, or boat lift into waters within the state that is not clean, drained, and dried or that is not cleaned, drained, and dried, following removal from waters for:
  - a. An owner or agent of the owner of a boat, dock, or boat lift with mussels attached that is subsequently launched directly into the infested water from which it was removed, if the boat, dock, or boat lift was stored on the riparian property of the owner or at a marina business property, prior to launch.
  - b. An owner or agent of the owner of a boat with a shooting or observational blind constructed of aquatic macrophytes cut above the water line, attached to or in boat.
3. Repeal current administrative rules requiring decontamination of boats that have used infested waters and were in the water for three or more days or have one gallon or more of water remaining after draining.

Motioned by Whitmyre, second by Bies TO APPROVED THE RECOMMENDED CHANGES TO THE AQUATIC INVASIVE SPECIES RULES ARE PRESENTED. Motion carried unanimously.

### **Fish Limits and Hoop Nets and Setlines**

John Lott, wildlife fisheries chief, presented the recommended changes as follows:

1. Change catfish regulations on Iowa/SD border waters to allow 10 channel catfish daily, 5 flathead catfish daily with allowance for, at most, one flathead catfish 30 inches or longer in length as part of the daily limit and one blue catfish daily.
2. Standardize gear types in inland waters of the Missouri River, western tributaries, Angostura Reservoir, Belle Fourche Reservoir and Shadehill Reservoir allowing hoop nets, traps, setlines and floatlines (add definition to general provisions chapter) to be used to target catfish and rough fish according to regulations.
3. Change title of chapter 41:07:08 to Hoop nets, traps and setlines.

Motioned by Sharp, second by Locken to APPROVED THE RECOMMENDED CHANGES TO THE FISH LIMITS, HOOP NETS AND SETLINES RULES. Motion carried unanimously.

### **Spearing and Blow Guns**

John Lott, wildlife fisheries chief, presented the recommended changes to the fishing season rules to open all inland waters including the Missouri River system to game fish spearing May 1 – March 31 annually with the exception of lake sturgeon, paddlefish and muskie statewide, northern pike in lakes currently managed for muskies, walleye in managed walleye fisheries where harvest is limited to a single fish daily, and salmonoids in the Black Hills, and allowing pike and catfish to be taken year-around and allow the use of blowguns as a legal method of take for fish as presented via petition in May. Recommended changes from proposal include blowguns as an additional method of take as part of seasons and locations open for use of legal spear, legal speargun, legal crossbow, and legal bow and arrow in inland waters, but not boundary waters with Nebraska, Iowa, and Minnesota.

Motioned by Locken, second by Whitmyre TO REMOVE USE OF BLOW GUNS IN THE TAKE OF FISH FROM THE FINALIZATION. Motion carried unanimously.

Motioned by Bartling, second by Bies TO APPROVE THE RECOMMENDED CHANGE TO AS AMENDED. Motion carried unanimously.

### **Spring Turkey**

Switzer presented the recommended changes to the spring turkey hunting season to Eliminate Unit BST-BH2, which is the second license currently available for residents within the Black Hills Fire Protection District for the month of May.

Motioned by Whitmyre, second by Bies TO APPROVE THE RECOMMENDED CHANGE TO THE SPRING TURKEY HUNTING SEASON. Motion carried unanimously.

### **Mountain Lion Hunting Season & Information on Population Status**

Andy Lindbloom and Andrew Norton, senior wildlife biologists explained the Department conducts several surveys and assessments to better understand mountain lion population abundance and trends in the Black Hills. Data that are evaluated include but are not limited to harvest surveys, non-harvest mortalities, removals and total mortality densities, mark/recapture population estimates, and catch per unit effort. Although not all trend indices assessed by the SDGFP are in agreement, several

surveys and population projections suggest mountain lions increased following several years of low harvest rates through 2018/19. The past 2 years (2019/20 and 2020/21) of increased harvest and other documented mortalities, however, are not sustainable and will result in a decreasing population.

Switzer presented the recommended changes to clean up the mountain lion hunting season to state: The mountain lion hunting season in the Black Hills Fire Protection District is open December 26 through April 30, provided that the department shall close the mountain lion hunting season in the Black Hills Fire Protection District if the harvest limit for that area is reached prior to ~~March 31~~ April 30.

Motioned by Rissler, second by Spring TO APPROVE THE RECOMMENDED CHANGE TO THE MOUNTAIN LION SEASON. Motion carried unanimously.

## **PROPOSALS**

### **Park Entrance License Sale Date**

Scott Simpson, division director, presented the recommended changes to allow some flexibility to the date in which annual park entrance licenses can be sold instead of limiting it to be October 1.

Motioned by Bies, second by Whitmyre TO APPROVE THE RECOMMENDED CHANGE TO SALE DATE OF PARK ENTRANCE LICENSES. Motion carried unanimously.

### **Camping Fees**

Scott Simpson, division director, presented the recommended changes to camping fees adding Dude Ranch, Elk Creek, and Sheps Canyon lakeside Use Area to basic campground fees, remove Randall Creek from the preferred campground fees and adding it to the prime campsites fees, and changing the CSP French Creek Horse Camp to \$36.

Motioned by Locken, second by Whitmyre TO APPROVE THE RECOMMENDED CHANGES TO CHARGE BASIC CAMPING FEES AT DUDE RANCH, ELM CREEK AND SHEPS CANYON LAKESIDE USE AREA. Motion carried unanimously.

Motioned by Bartling, second by Sharp TO MOVE RANDALL CREEK FROM A PREFERRED CAMPGROUND TO PRIME CAMPSITE FEE LIST. Motion carried unanimously.

Motioned by Sharp, second by Locken TO APPROVE THE INCREASED CAMPING FEE AT CSP FRENCH CREEK HORSE CAMP FROM \$31 TO \$36. Motion carried unanimously.

### **Park Check Out Time**

Scott Simpson, division director, presented the recommended changes to make checkout times for all state park lodging 11:00am for consistency to reduce confusion with customers and provide adequate time for cleaning between stays.

Motioned by Sharp, second by Bies TO MAKE CHECKOUT TIMES FOR ALL STATE PARK LODGING 11:00AM. Motion carried unanimously.

## **DIVISION OF PARKS AND RECREATION**

### **Spring Creek Prospectus**

Scott Simpson, division director, provided the Commission copies of the Spring Creek Resort Restaurant Prospectus.

Motioned by Sharp, second by Bartling TO AUTHORIZE THE DEPARTMENT TO ISSUE AND ADVERTISE A PROSPECTUS FOR THE SALE OF SPRING CREEK CONCESSION RESTAURANT LEASE. Motion carried unanimously.

### **CSP Construction and Rally Update**

Scott Simpson, division director, provided an update on the construction at Custer State Park and status from the 2021 motorcycle rally.

### **Palisades Development Update**

Luke Dreckman, District Park Supervisor presented the Commission with an update on the construction progress underway at Palisades State Park. The mainline road and new park entrance area have been built with approx. 80% of the base course material added to these features at this time. The road contractor has now shifted his efforts to constructing the campground loop consisting of 70 campsites. All road work is expected to be complete by mid-September of this year. During the 2022 construction season park utilities (i.e. electricity, water, etc.), a park Welcome Center/Office, a campground comfort station and dump station will be constructed. Additional connector roads and parking areas will also be built to various day-use areas that will be developed in the future throughout the new expansion property.

### **Recreational Trails Program Awards**

Randy Kittle, grants coordinator, provided information on the recreational trails program and grants being awarded.

### **Revenue, Camping and Visitation Report**

Al Nedved, Parks and Recreation Deputy Director, provided July's revenue, visitation and camping report.

## **DIVISION OF WILDLIFE**

### **Elk Management Action Plan**

Chad Switzer, program manager, presented the elk management action plan.

Motioned by Bies, second by Bartling TO APPROVE THE ELK MANAGEMENT PLAN AS RECOMMENDED. Motion carried unanimously.

### **Elk Contingency Licenses**

Andrew Norton, senior wildlife biologist, provided data regarding the elk population for recommendation in license allocation.

Chad Switzer, program manager, presented recommended changes for the 2021 hunting season to be five antlerless elk licenses for units the following units H2HIJ, H3BCD, H4B and H9B totally 20 contingency licenses.

Motioned by Whitmyre, second by Sharp TO APPROVE THE ADMINISTRATIVE ACTION TO ALLOCATE THE 20 ELK CONTINGENCY LICENSES AS RECOMMENDED. Motion carried unanimously.

### **Canada Goose License and Kill Permits**

Tom Kirschenmann, division director and Jacquie Ermer, regional supervisor, provided the commission information for Canada goose licenses and kill permits.

### **Antler Auction Results**

Sam Schelhaas, law enforcement chief, gave a brief update on the 2021 Antler Auction held in Milbank South Dakota on June 26, 2021. Farrell Auction Company was the auction company that was selected. Schelhaas shared that the gross receipts were \$82,095 with approximately \$15,000 of that from firearm sales. The auction was done in conjunction with South Dakota Property Management and also contained items from other state agencies.

### **License Sales Update**

Tom Kirschenmann, wildlife division director, provided an update on resident and nonresident license sales.

### **Adjourn**

Meeting adjourned at 9:30 a.m.

Respectfully Submitted,



Kevin Robling, Department Secretary

**Public Hearing Minutes of the Game, Fish and Parks Commission  
September 1, 2021**

The Commission vice chair Doug Sharp began the public hearing at 2:00 p.m. CT. Commissioners Julie Bartling, Travis Bies, Jon Locken, Russell Olson, Stephanie Rissler, Doug Sharp, Charles Spring, and Robert Whitmyre were present. Kotilnek indicated written comments were provided to the Commissioners prior to this time and will be reflected in the Public Hearing Minutes. Kotilnek then invited the public to come forward with oral testimony. Written comments attached.

**Fish Limits**

No verbal comments

**Hoop Nets & Setlines**

Nancy Hilding, Prairie Hills Audubon Society – Black Hawk, SD – provided concerns on process stating the public cannot make a substantial comment or substantial change during the meeting saying this is not transparent and provided rules regarding such. Says the rule can be changed on the testimony. Concerned about incidental take of otters from hoop nets and setlines. These are not allowed in most of the area and ask that it be amended to find something to minimize the incidental take of otter and other aquatic mammals. Specifically, the design and maintenance and trap check time.

**Bait Regulations**

No verbal comments

**Spearfishing**

No verbal comments

**Blow Guns**

No verbal comments

**Private Hatchery**

No verbal comments

**Tournaments**

No verbal comments

**Aquatic Invasive Species**

Nancy Hilding, Prairie Hills Audubon Society – Black Hawk, SD - Recommends amendments on AIS per comment from Izaak Walton League. Suggest creation of a hold for 21 days

**Spring Turkey**

No verbal comments

**Mountain Lion Hunting Season**

Chris Hesla, SD Wildlife Federation – Pierre, SD – opposes the ability to chase mountain lions from private land to public land because of how the mountain loin is designated as a big game animal in SD. If chased off private land they should get a break or change designation to be a varmint. Feels we are already doing a good job of managing mountain lions.

Haley Steward, Humane Society – Beaverton, OR – opposed to the proposal due to excessive levels of recreational hunting as it is for trophy and not sustenance. If this continues, they would like to see it be done as sustainable levels. Recommends changes to limit hunting of breeding females. Feels the use of hounds is not fair sporting.

Nancy Hilding, Prairie Hills Audubon Society – Black Hawk, SD – spoke regarding comment she tried to submit. Provided printed copies of her comments and stated these comments can be considered as amendments. Recommends the female quote be limited to under 40. Recommends no hound hunting, but willing to compromise no hunting from private land to public land and no hunting by hounds on prairie unit. Says there is a requirement to enter the petition.

Brad Tisdall, SD Houndsmen – Rapid City, SD – president of organization that brought petition forward. Not asking for anything special that is not allowed to every other sportsman. This helps control lions in an area that GFP cannot manage and the Houndsmen can do so by working with landowners. Helps check for what is referred to as presumed lions. This is less demanding then hunting then in the black hills allowing youth, elderly, and disabled hunters. Also allows education for non-hound hunters to see what it really takes to work a dog. Thanked all present, past Commission and GFP staff for work over the past 10 years in his role as president of the SD Houndsmen. Noted that there were complaints on how the rule was rewritten and said it was the right thing to do. This helps to make things easier like doing the right thing when no one is watching. The SD Houndsmen are happy with this change.

Julie Anderson, Rapid City, SD – trophy hunting is cruel and inhumane not population control only bloodlust. Kittens die or are orphaned. This tilts a population to majority of male as predators. This is a self-regulating species that preys on other animals such as diseased and over abundant animals. Asked how private landowners are supposed to object to mountain lions being hunted on their land.

The public Hearing concluded at 2:33 p.m.

Respectfully Submitted,



Kevin Robling, Department Secretary

## Appendix A

# Public Comments

## Aquatic Invasive Species

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**Paul Lepisto**

**Pierre SD**

**Position:** support

**Comment:**

On behalf of SD IWLA Division President Kelly Kistner I'm submitting the attached comments on the AIS proposal. We support the proposal but ask for it to be further amended to help protect the health of SD waters.

## Hoop Nets and Setlines

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**Brian Pauly**

**Woonsocket SD**

**Position:** support

**Comment:**

I support the standardization and incorporation of floatlines as part of the rules to anglers wishing to target catfish and rough fish on inland waters.

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**Travis Runia**

**Wolsey SD**

**Position:** support

**Comment:**

I support the proposal to expand fishing opportunity by allowing the use of floatlines for catfishing on select waters. I purchase a setline license each year and look forward to trying this new method if approved.

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**Kejaita Kejaitamj**

**Kazan UT**

**Position:**

**Comment:**

No comment text provided.

# Mountain Lion Hunting Season

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**James Tirey**

**Rapid City SD**

**Position:** oppose

**Comment:**

No comment text provided.

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**Peggy Jakopak**

**Scotland SD**

**Position:** oppose

**Comment:**

There is never a valid reason to trophy hunt. It's sick and unnecessary.

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**Birgit Munz**

**Brandon SD**

**Position:** oppose

**Comment:**

Why? Why do these beautiful & majestic cats have to be hunted? Absolutely disgusting!

---

**Susi Blasius**

**Sioux Falls SD**

**Position:** oppose

**Comment:**

Trophy hunting is cruel and unnecessary.

In South Dakota, dozens of mountain lions are killed every year for trophies and bragging rights. In fact, more mountain lions are killed by trophy hunting than any other cause. Fewer than 300 mature-age mountain lions are thought to reside in South Dakota. South Dakota's rare mountain lion population must be protected from cruel trophy hunting

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**Mary Cook**

**Rapid City SD**

**Position:** oppose

**Comment:**

Please protect mountain lions in the Black Hills. Because of rampant development and real estate sales of wildlife corridor lands, they are being pushed out of so many of their hunting areas and dens. They have a right to life.

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**Timothy Dalton**

**Eureka SD**

**Position:** oppose

**Comment:**

No comment text provided.

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**Kimberley Kringen**

**Rapid City SD**

**Position:** oppose

**Comment:**

No comment text provided.

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**Mary Robinson**

**Highmore SD**

**Position:** oppose

**Comment:**

No comment text provided.

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**Micky Bevers**

**Sioux Falls SD**

**Position:** oppose

**Comment:**

South Dakota needs to play its part in protecting the state's mountain lion population by ending trophy hunting!

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**Roxanne Tchida**

**Sisseton, Sd SD**

**Position:** oppose

**Comment:**

This is completely unnecessary!!

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**Tammy Osheim**

**Brandon SD**

**Position:** oppose

**Comment:**

I oppose having expansion of mountain lion hunting season including the expanded use of hounds. This is barbaric and unsportsmanlike and in addition it causes mountain lions to interact more with livestock and humans as they are being pursued and pressured.

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**Kim Hall**

**Centerville SD**

**Position:** oppose

**Comment:**

No comment text provided.

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**Katie Gilmore**

**Harrisburg SD**

**Position:** oppose

**Comment:**

As a former hunter I am very opposed to a pointless mountain lion season. If left alone the lions would help manage the excessive deer population. Humans need to feed their egos some other way, maybe helping fellow humans or photographing wildlife, instead of shooting mountain lions. Shooting animals for food serves a purpose; trophy hunting does not. Please don't allow another pointless hunting season.

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**Jc Corcoran**

**Glorieta NM**

**Position:** oppose

**Comment:**

Please oppose the 2021-2022 mountain lion trophy hunting season and expansion of hound hunting on mountain lions in South Dakota. South Dakota needs to play its part in protecting the state's mountain lion population by ending trophy hunting!

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**Julia Natvig**

**Sioux Falls SD**

**Position:** oppose

**Comment:**

I oppose the 2021-2022 mountain lion trophy hunting season and expansion of hound hunting on mountain lions in SD. SD needs to protect apex predator species such as cougars to maintain a balanced ecosystem. Trophy hunting disrupts this balance and endangers other species, including domestic pets and human children.

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**Terri Pepper**

**Sioux Falls SD**

**Position:** oppose

**Comment:**

No comment text provided.

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**Theresa Giannavola**

**Aberdeen SD**

**Position:** oppose

**Comment:**

I oppose this hunting season, all trapping that takes place in SD and Governor Noem's tail bounty program!

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**Louise Mcgannon**

**Mitchell SD**

**Position:** oppose

**Comment:**

I totally, totally oppose the mountain lion hunting season. Everything about it is wrong. They are part of the ecosystem, humans should not be regulating it when nature does a much better job than you'd ever hope to. Point in case, is the governor's predator bounty program, it has accomplished nothing and so will this mountain lion season, accomplish nothing good. Just bragging rights for the hunters.

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**Bronwyn Castillo**

**Sioux Falls SD**

**Position:** oppose

**Comment:**

Stop killing!

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**Rhys Fulenwider**

**Rapid City SD**

**Position:** oppose

**Comment:**

Large predators have been proven to help keep our ecology in balance. With as few Mountain Lions as there are in South Dakota, how can we in good conscious hunt them? I am ashamed to be associated with a state with such backward ideals

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**Patricia Brosz**

**Aberdeen SD**

**Position:** oppose

**Comment:**

I strongly oppose the 2020-2021 Trophy Mountain Lion hunting and as fervently, hunting Mountain Lions with the use of dog packs to pursue and injure the targeted Lion. Cruel and unfair practices, please stop!

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**Cynthia Brady**

**Lead SD**

**Position:** oppose

**Comment:**

I oppose trophy hunting of mountain lions in South Dakota. I especially oppose the use of hounds to hunt mountain lions.

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**Teresa Hicks**

**Rapid City SD**

**Position:** oppose

**Comment:**

The hunting of our Mountain Lions in the Black Hills needs to stop. Killing them for the sake of a trophy is so disgusting and hunting them with hounds needs to be outlawed. From what I have read from different sources we don't have that many of them. They need to be protected, not killed. The only reason to kill one is if they are a danger to the public or sick.

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**Kath Knox**

**Belle Fourche SD**

**Position:** oppose

**Comment:**

Stop trying to kill the mountain lions off

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**Cory Ferguson**

**Rapid City SD**

**Position:** oppose

**Comment:**

No comment text provided.

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**Kim Nordsiden**

**Winner SD**

**Position:** oppose

**Comment:**

No comment text provided.

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**Diana Boyle - Mountain Lion  
Foundation**

**Sacramento CA**

**Position:** oppose

**Comment:**

No comment text provided.

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**Theresa Shay**

**Sioux Falls SD**

**Position:** oppose

**Comment:**

I oppose the trophy hunting of mountain lions, especially when involving the use of hounds.

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**Patrick Shay**

**Sioux Falls SD**

**Position:** oppose

**Comment:**

As a South Dakota citizen I urge you to oppose the 2021-2022 mountain lion trophy hunting season and expansion of hound hunting on mountain lions in South Dakota.

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**Evan Crimson**

**Watertown SD**

**Position:** oppose

**Comment:**

No comment text provided.

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**Jeff Strub**

**Madison SD**

**Position:** oppose

**Comment:**

No comment text provided.

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**Julie Anderson**

**Rapid City SD**

**Position:** oppose

**Comment:**

I object to the mountain lion hunting season, especially trophy hunting by hound hunters. The proposed increase in the harvest numbers will certainly create more orphan cubs that will increase conflicts with humans. You are perpetuating this scenario by proposing the extended areas that hound hunters may now go. You are killing the animals that are not causing any problems. Please oppose any new areas for hound hunting.

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**Ann Parsells**

**Hot Springs SD**

**Position:** oppose

**Comment:**

Why is the only answer to balancing the mountain lion life cycle with other animal nations typically solved with hunting and killing? Why can't a policy of removal and resettling for their lives and purpose be the first step? How can we claim as a nation to be humane when we support the killing thrill and joy for a trophy alone? If a mountain lion is hunted, then the hunter needs to pay much more for the animal's life and the body needs to be used for good, not a trophy. It is sickening that we promote killing as a sport of precious lives that God created. We didn't and yet we, as humans, just decide who lives and dies, what animal has intrinsic value at the auction as opposed to the beauty and value in the wild. We can live in balance if we trust wildlife science as we can if we trust fire suppression science. How much more do we need to kill to feel alive? Please stop allowing trophy hunting. It is cruel, pathetic and shows the emptiness of the 'hunter'. Thank you.

---

**Caryn Lerman**

**Hot Springs SD**

**Position:** oppose

**Comment:**

No comment text provided.

---

**Dean Parker**

**Sioux Falls SD**

**Position:** oppose

**Comment:**

I'm writing in opposition of the 2021-2022 mountain lion trophy hunting season and the expansion of using dogs to hunt mountain lions in our state. Hound hunting is inhumane for the lion and dangerous for the dogs involved. It is cruel, unsporting and unnecessary.

---

**Heather Philbrook**

**Rapid City SD**

**Position:** oppose

**Comment:**

No comment text provided.

---

**Angela Antijunti**

**Rapid City SD**

**Position:** oppose

**Comment:**

No comment text provided.

---

**Heidi Hanson**

**Sioux Falls SD**

**Position:** oppose

**Comment:**

This is a cruel practice and I adamantly oppose it.

---

**Shannon Steckelberg**

**Harrisburg SD**

**Position:** oppose

**Comment:**

No comment text provided.

---

**Ali Horsted**

**Sioux Falls SD**

**Position:** oppose

**Comment:**

No comment text provided.

---

**Cheryl Stone**

**Fort Pierre SD**

**Position:** oppose

**Comment:**

Oppose the use of dogs to hunt mountain lions.

---

**Maria Chalaire**

**Brandon SD**

**Position:** oppose

**Comment:**

No comment text provided.

---

**Sheena Thomas**

**Sioux Falls SD**

**Position:** oppose

**Comment:**

No comment text provided.

---

**Jan Humphrey**

**Hill City SD**

**Position:** oppose

**Comment:**

This is a horrible practice. Even considering it as one of your sports in this state makes me believe you are the most evil entity to exist. Shame on you. You are supposed to be stewards of the forest. That includes its creatures.

---

**Teresa Hicks**

**Rapid City SD**

**Position:** oppose

**Comment:**

It is bad enough we have a hunting season on Mountain Lions when there is no need for one but to allow the use of hounds is truly despicable. This isn't hunting, its cruel and unsportsmanlike.

---

**Stacie Bechtold**

**Sioux Falls SD**

**Position:** oppose

**Comment:**

No comment text provided.

---

**Shelby Jepperson**

**Sioux SD**

**Position:** oppose

**Comment:**

No comment text provided.

---

**Emily Dunn**

**Mitchell SD**

**Position:** oppose

**Comment:**

Strongly oppose this cruel hunting of mountain lions

---

**Karen Damman**

**Garretson SD**

**Position:** oppose

**Comment:**

This is cruel hunting let alone with dogs! Needs to stop!!!

---

**Hailey Stuart**

**Brookings SD**

**Position:** oppose

**Comment:**

No comment text provided.

---

**Tania Taylor**

**Mitchell SD**

**Position:** oppose

**Comment:**

No comment text provided.

---

**Patricia Cressy**

**Pierre SD**

**Position:** oppose

**Comment:**

Hunting "Cats" with dogs is cruel & a danger to the dogs. It is cruel, unfair & gives no chance for the hunted to be able to escape or for the babies to easily be killed. It's just wrong.

---

**Brenda Manning**

**Pierre SD**

**Position:** oppose

**Comment:**

This is a barbaric practice for not only the mountain lions but the dogs used in these hunts. I strongly oppose the use of dogs in hunting mountain lions.

---

**Melody Dennis**

**Deadwood SD**

**Position:** oppose

**Comment:**

Using dogs to hunt lions is barbaric and cruel. To the lions and the dogs. Lets quit killing anything that moves.

---

---

**Kathryn Hess**

**Summerset SD**

**Position:** oppose

**Comment:**

This is cruel and inhumane. These beautiful creatures don't have a chance when being hunted with dogs. These people who hunt with dogs are not hunters. There should be no Mountain Lion hunting with or without dogs.

---

**Taylor Albright**

**Sioux Falls SD**

**Position:** oppose

**Comment:**

Inhumane. Period.

---

**Margaret Sohn**

**Gainesville FL**

**Position:** oppose

**Comment:**

No comment text provided.

---

**Eric Dezell**

**Sioux Falls SD**

**Position:** oppose

**Comment:**

No comment text provided.

---

**Dana Peugh**

**Mitchell SD**

**Position:** oppose

**Comment:**

No comment text provided.

---

**Rebecca Cooper**

**Summerset SD**

**Position:** oppose

**Comment:**

Oppose using dogs for hunting of mountain lions.

---

**Emily Norman**

**Sisseton SD**

**Position:** oppose

**Comment:**

No comment text provided.

---

**Cathie Llamas**

**Pierre SD**

**Position:** oppose

**Comment:**

Inhumanly strongly opposed to thus

---

**Kim Smith**

**Hartford SD**

**Position:** oppose

**Comment:**

Our state has killed enough wildlife with its predator hunting and mountain lion hunting. The populations on these animals have decreased to the point you dont even see them out in the country. Sad that our state is diminishing our wildlife.

---

**Anita Mason**

**Smithwick SD**

**Position:** oppose

**Comment:**

No comment text provided.

---

**Jeanie Gabert**  
**Belle Fourche SD**  
**Position:** oppose

**Comment:**

No comment text provided.

---

**Lori Tetreault**  
**Whitewood SD**  
**Position:** oppose

**Comment:**

These beautiful animals should not be destroyed because hunter's seek them out inhumanely as trophies to satisfy their hunting egos. Please protect these God-given creatures!

---

**John Fitzgerald**  
**Hot Springs SD**  
**Position:** oppose

**Comment:**

No comment text provided.

---

## Mountain Lion Season Restrictions

---

**Kenny Halbritter**  
**Sioux Falls SD**  
**Position:** support

**Comment:**

No trophy hunting of SD Mountain Lions

---

**Tammy Osheim**  
**Brandon SD**  
**Position:** oppose

**Comment:**

I oppose adding expansion of hounds to hunt mountains lions or any use of hounds. It is needlessly cruel and terrorizes the lions and other wildlife that get in the way. Trophy hunting should not supersede humane practices nor be considered a right at any cost to the animal.

---

**Paula Roskens**

**Lead SD**

**Position:** oppose

**Comment:**

Trophy hunting is inhumane. It's been 150 years since a human has been killed or maimed by a mountain lion. To take an animal's life to decorate with or for enjoyment is so sad. These are beautiful animals, who wish only to be left alone and far away from humans. Showing reverence for life is humane, good sportsmanship. To kill so that you may eat is one thing, but it's sick to kill for the fun of it. It doesn't say much for humans who have all the advantages to destroy these animals. They are part of the wild, they belong there, it's us who don't.

---

**Preston Olson**

**Sioux Falls SD**

**Position:** support

**Comment:**

No more trophy mountain lion hunting.

---

**Sheryl Nieman**

**Parker SD**

**Position:** support

**Comment:**

Trophy hunting is a waste of beautiful animals that are assets to our state for no good reason other than bragging rights for the hunters. This is a sick practice.

---

**Cynthia Brady**

**Lead SD**

**Position:** other

**Comment:**

Hello,  
I oppose trophy hunting of mountain lions, and in particular the use of hounds to hunt mountain lions.  
Thank you.

---

**Sandy Dumke**

**Crooks SD**

**Position:** other

**Comment:**

No comment text provided.

---

**Diana Boyle - Mountain Lion  
Foundation**

**Sacramento CA**

**Position:** oppose

**Comment:**

Please see the Mountain Lion Foundation's comments regarding this matter, attached.

---

**Darci Willemsen Adams**

**Hartford SD**

**Position:** oppose

**Comment:**

See attached pdf comments submitted under the Mountain Lion Hunting Season topic.

---

**Susan Dubovsky**

**East Tawas MI**

**Position:** oppose

**Comment:**

I am writing to oppose the petition to kill Mountain Lions in your state. It will lead to the endangered and extinct animals, and are an important species needed in the Eco-system.  
This is clearly a trophy hunt/kill and should be banned. Using dogs will only endanger the dogs life. Please reconsider this idea.  
Thank you.

---

**Paula Von Weller**

**Spearfish SD**

**Position:** oppose

**Comment:**

I am strongly opposed to the South Dakota Houndsmen Association's petition that would expand hound hunting of mountain lions throughout the state.

---

**Jennifer Jenkins**

**Tucson AZ**

**Position:** support

**Comment:**

Dear South Dakota Wildlife Management,

Please oppose the South Dakota Houndsmen Association's petition to expand hound hunting of mountain lions in South Dakota and to protect mountain lions from trophy hunting. This is a cruel practice and not only cruel, but will actually increase conflicts with humans over time. South Dakota has a small population of cougars left. This practice will continue to push this top predator to extinction. Doing this destroys our children's chance of enjoying the natural world and sends a message that short-term pleasure in blood sports is more important than anything else. In addition, this may bring short term profits to the state of South Dakota, in the long run, it will do the opposite. Killing off top line predators has proven to be detrimental to the environment which subsequently destroys the economy.

Sincerely,  
Jen

---

**Gwendolyn Oberholtzer**

**Spearfish SD**

**Position:** oppose

**Comment:**

Please oppose the expansion of hound hunting of mountain lions in SD based on the estimated number of mature age lions remaining.

## Other

---

**Michael Mattson**

**Britton SD**

**Position:** oppose

**Comment:**

Please stop the senseless trapping of River Otters and Beavers! If you're too lazy to get a count on them, then it should be stopped immediately! That's like letting blind people apply for and receive a drivers license when common sense tells us that's idiotic. Laziness and idiocy should never be allowed with our taxpayer receiving funded GFP employees. Since when did our state employees throw common sense out the window???

---

**Paul Dulitz**

**Webster SD**

**Position:** other

**Comment:**

Wheatland GPA

Canada Thistle spread, sorry I didn't get a better picture. The white area is spreading thistles, this isn't the only infestation on the GPA! It was sprayed too late and should have been mowed at the time! Good thing this area isn't popular as that is not the image I would want to show people from out of state!

---

**Simon Yoakum**

**Dixon MO**

**Position:** other

**Comment:**

If you want to increase out of state pheasant hunters, let them hunt opening day not week later. I hunted south Dakota for 17 years until you penalized me for not living in your state I pay much more than a resident, yet I am handicapped one week

---

**Mike Hoelsing**

**Aberdeen SD**

**Position:** oppose

**Comment:**

I find it very unfair that nonresident archery hunters are able to hunt Unit 35L (Custer National Forest in Harding County) and I, a South Dakota resident for over 35 years, can't. I am a landowner and pay over 10k in property taxes every year to SD and I am unable to hunt public land in my home State but Non-residents can.? Please explain the GFP's reasoning behind this regulation.

Respectfully Submitted,  
Mike Hoelsing

---

**Carter Anderson**

**Sioux Falls SD**

**Position:** oppose

**Comment:**

As a trained statistician, I am opposed to the dropping the pheasant survey data created in 1949

---

**Jerald Hemeyer**

**Gregory SD**

**Position:** support

**Comment:**

Ate tag to a personal representative in case of an medical emergence. I have just contacted cancer and have a port to inject the treatment so I am not able to shoot a high power gun. I would like to transfer the right to my Son who has a good hunting record. By state law I am unable to do this. Law are written to help the farmer and the hunters. The place I hunt told me they were just going to start shooting deer and leave them lay. As a hunter I talked them let me do it for the meat. They agreed they have no faith in the Game Fish and Parks. The department will do anything to improve pheasant hunt especially for the out of state hunter but do not care about the instate hunter. The four Pheasant limit had them shut off all hunting on their land. Thats about how many pheasants they have on one sections but for the hunting lodges its okay. I have come to the farmer next to public hunting say they hardly ever hear a gun shot during pheasant season and do not see pheasant after the season. I guess I am speaking what I hear in the Public that the Game Fish and Parks governing only care about big money hunting not family hunting any more. the Group is made up of hunting and fishing guides not common people. Bill Janklow once said the When the common Man can not hunt hunting will be outlawed. I do not think the comission is closer than they know to this happening  
Please at least change one law so we can try to rid a rancher of deer and help a man get his son back in hunting again

---

## Spearfishing

---

**Travis Runia**

**Wolsey SD**

**Position:** support

**Comment:**

I support the spearfishing petition as I enjoy spearing pike through the ice. I would appreciate the opportunity to harvest other game fish on more waters, although they are rarely observed as the petitioner described.

---

## Spring Turkey

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**Karasevasype Karasevasypemi**

**Debrecen DE**

**Position:**

**Comment:**

No comment text provided.





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August 25, 2021

Russell Olson, Commission Chair  
South Dakota Game, Fish and Parks  
523 East Capitol Ave  
Pierre, SD 57501

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

**RE: Proposed 2021-22 and 2022-23 Mountain Lion Hunting Seasons**

Dear Chairman Olson, 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) proposed 2021-22 and 2022-23 Mountain Lion Hunting Seasons ("Proposal"). We oppose the Proposal because it allows excessive levels of hunting on mountain lions (*Puma concolor*) harming their population in South Dakota.

The Humane Society of the United States is opposed to the use of recreational hunting to manage mountain lions in South Dakota, because the objective of such killing is merely for trophies and not subsistence.<sup>1</sup> 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>2</sup> Hunting of mountain lion also harms ungulates because these top carnivores target sick animals, including those with chronic wasting disease.<sup>3</sup> Finally, a national survey sponsored by the National Shooting Sports Foundation shows that the majority of Midwesterners, including South Dakotans, oppose trophy hunting.<sup>4</sup>

For these reasons, and those outlined in Appendix A of these comments, we request that the Commission reject the Proposal and protect South Dakota's mountain lions from trophy hunting now and in perpetuity. If GFP is to continue allowing the hunting of mountain lions, we request that the agency limit the practice to sustainable levels 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.) Lift the arbitrary population objective of 200-300 total mountain lions and limit the annual hunting quota to no more than 14% of South Dakota's adult/subadult mountain lion population. This amounts to no more than 38 mountain lions, based on GFP's most recent estimate of 277 adult/subadult lions in the state. GFP could also develop an annual quota based on an average population over the last five years, to account for the agency's widely fluctuating population estimates.

Hunting above 14% of the mountain lion population results in declines to the population.<sup>5</sup> Colorado Parks and Wildlife (CPW) has recently adopted a cap of 14% on mountain lion hunting quotas in certain regions as part of their new West Slope Mountain Lion Management Plan.<sup>6</sup> Additionally, CPW has adopted a cap of 16% on total human-caused mortality to account for other sources of lion deaths. While Colorado's lions still require

---

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additional protection from trophy hunting, these new caps demonstrate the growing acceptance by state wildlife agencies that heavy hunting on mountain lions, including what is currently allowed in South Dakota, is unsustainable and, indeed, harmful to the state's mountain lion population.

GFP's Proposal continues to authorize trophy hunting on mountain lions that exceeds this sustainable level, threatening the stability of South Dakota's mountain lion population as well as their range expansion to their historic range where they had been extirpated. We call on the agency to implement 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 of 200-300 total mountain lions.

2.) Implement a 20% sublimit on female hunting mortality as a proportion of total hunting mortality. Multiple studies across the western U.S. demonstrate that limiting female mortality to approximately 20% of total hunting mortality is necessary to ensure a stable population.<sup>7</sup> Based on the current population estimate and an estimated sustainable quota of 38 total lions, GFP must limit the female subquota to no more than eight cats.

While still higher than what is sustainable, Colorado Parks and Wildlife has implemented a 22% adult female mortality sublimit on total hunting mortality<sup>8</sup> and the Arizona Game and Fish Department has implemented a 25% adult female mortality sublimit on total hunting mortality.<sup>9</sup> GFP must take additional steps to protect resident females and ensure hunting of females does not exceed sustainable levels. The current subquota of 40 female mountain lions out of a total quota of 60 lions is far too high.

3.) Prohibit the hunting of mountain lions with hounds throughout South Dakota, including outside of the Black Hills Fire Protection District. Currently, the Proposal would expand the allowance for hound hunting outside of the Black Hills Fire Protection District that originates on private land to cross over or culminate on private land or public land, as long as it's not expressly prohibited by the managing entity.

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>10</sup> Hounds kill kittens, and mountain lions often injure or kill hounds.<sup>11</sup> The practice is exceedingly stressful and energetically taxing to mountain lions.<sup>12</sup> Furthermore, hound hunting is not considered "fair chase" hunting by most.<sup>13</sup> Hounds also chase and stress non-target wildlife, from porcupines to deer,<sup>14</sup> and trespass onto private lands.<sup>15</sup> If GFP is to continue allowing the hunting of mountain lions, the agency must prohibit the use of hounds.

In conclusion, South Dakota's mountain lions are a vital component of our natural wild heritage and deserve reasoned management for long-term conservation.<sup>16</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 and implement a female sublimit of 20% of total hunting mortality. 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, not expanded as GFP has proposed. Thank you for your consideration.

Sincerely,

Darci Willemsen Adams  
Program Manager, Law Enforcement Outreach & Engagement  
The Humane Society of the United States  
[dadams@humanesociety.org](mailto:dadams@humanesociety.org)



## Appendix A

### I. Trophy hunting of mountain lions is unsustainable, cruel and harmful to family groups

Trophy hunting is the greatest source of mortality for mountain lions throughout the majority of their range in the United States.<sup>17</sup> The practice is harmful to more than just the wild cats who are killed. Conservation biologists have derided this practice as unnecessary and wasteful. Batavia et al. (2018) write: Compelling evidence shows that the animals hunted as trophies have sophisticated levels of “intelligence, emotion and sociality” that are “profoundly disrupted” by trophy hunting.<sup>18</sup> For these reasons, GFP must not allow trophy hunting of mountain lions in our state:

1.) *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>19</sup> Human persecution affects their social structure,<sup>20</sup> and harms their persistence.<sup>21</sup>

Research shows that trophy hunting results in *additive mortality*—trophy hunters increase the total mortality to levels that far exceed what would occur in nature.<sup>22</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>23</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>24</sup>

Biologists Wolfe et al. (2015) recommend that states manage mountain lions at a metapopulation level rather than at the single population level. They further add, “We recommend a conservative management approach be adopted to preclude potential over-harvest in future years.”<sup>25</sup> Instead, South Dakota’s mountain lions experience *additive* levels of mortality.<sup>26</sup> Extensive research shows that this additive mortality caused by high levels of hunting results in population sinks.<sup>27</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>28</sup>

2.) *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>29</sup> Over-hunting harms a population’s ability to recruit new members if too many adult females are removed.<sup>30</sup> A Utah study shows that trophy hunting adult females orphans their kittens, leaving them to die by dehydration, malnutrition, and/or exposure.<sup>31</sup> Kittens are reliant upon their mothers beyond 12 months of age.<sup>32</sup>

3.) *Trophy hunting harms entire mountain lion communities:* A recent study on mountain lions shows that they 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>33</sup> Disrupting these communities leads to deadly intraspecific strife, including infanticide and social chaos within the family groups.<sup>34</sup> Trophy hunting destabilizes mountain lion populations, which may cause increased conflicts with humans, pets and livestock.<sup>35</sup>



4.) *Trophy hunting is unnecessary, as mountain lions are a self-regulating:* 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>36</sup> Their populations must stay at a much smaller size relative to their prey's biomass or risk starvation.<sup>37</sup> They do this by regulating their own numbers.<sup>38</sup> When prey populations decline, so do mountain lion populations.<sup>39</sup> Mountain lion populations also require expansive habitat, with individual cats maintaining large home ranges that overlap with one another.<sup>40</sup>

5.) *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>41</sup> As such, conserving these large cats on the landscape creates a socio-ecological benefit that far offsets any societal costs.<sup>42</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>43</sup> Additionally, carrion left from mountain lion kills feeds scavengers, beetles, foxes, bears and other wildlife species, further enhancing biodiversity.<sup>44</sup>

6.) *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 at close range is unsporting, unethical and inhumane.<sup>45</sup> Hounds kill kittens, and mountain lions often injure or kill hounds.<sup>46</sup> The practice is exceedingly stressful and energetically taxing to mountain lions.<sup>47</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>48</sup> A study by Bryce et al. (2017) found that 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. In other words, a 3.5-minute chase likely equaled 18 minutes of energy the mountain lion would have expended on hunting activities necessary to find prey.<sup>49</sup>

Hounding is not considered “fair chase” hunting by most.<sup>50</sup> Fair chase hunting is predicated upon giving the animal an equal opportunity to escape from the hunter.<sup>51</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 lions. Hounds also chase and stress non-target wildlife, from porcupines to deer,<sup>52</sup> and trespass onto private lands.<sup>53</sup>

## **II. 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), rather than by natural predation by carnivores (“top down” regulators).<sup>54</sup> However, when herds lose those carnivores, they suffer poorer health and body condition, as well as more degraded habitats.<sup>55</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>56</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 carnivore removal actions “generally had no effect” in the long term on ungulate populations.<sup>57</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>58</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 increase nutritional conditions for ungulates as these factors are the most important for mule deer survival.<sup>59</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>60</sup> resource competition by livestock, and loss of habitat.<sup>61</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>62</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>63</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.<sup>64</sup>

South Dakota can better plan for bighorn sheep management by selecting relocation sites for bighorn sheep that have little stalking cover.<sup>65</sup> Escape terrain that contains cliffs, rocks, and foliage makes excellent ambush cover for a mountain lion and should be avoided.<sup>66</sup> Also, the amount of mountain lion predation is generally greater on small-sized bighorn sheep populations (those with fewer than 100 individuals) than on other, larger bighorn sheep populations.<sup>67</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>68</sup>

### **III. 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>69</sup> that can result in numerous human mortalities and pose significant financial and ecological costs to society.<sup>70</sup> In fact, by reducing vehicle collisions with deer, mountain lions saved drivers \$1.1 million in collision costs annually in South Dakota.<sup>71</sup> Additionally, highways fragment wildlife habitats, which can lead to both genetic inbreeding problems and direct mortality from vehicle collisions.<sup>72</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, preventing not only vehicle strikes, but protecting species and people while saving millions of dollars annually.<sup>73</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. For example, during a study in Rocky Mountain National Park, researchers found mountain lions preyed on deer infected with CWD.<sup>74</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>75</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>76</sup>



This ecosystem benefit is increasingly important as CWD infection continues to grow in prevalence and distribution in South Dakota<sup>77</sup> and neighboring states. Hammering our state's mountain lion population through high levels of trophy hunting undermines one of our best defenses against the spread of this deadly disease.

#### **IV. Trophy hunting increases human-mountain lion conflict and livestock depredation**

Hunting and lethal control of mountain lions results in increased conflicts because lions' social structure are destabilized.<sup>78</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>79</sup> Instead, the authors concluded, non-lethal alternatives to lethal removal of native carnivores, coupled with coexistence (husbandry techniques) may resolve conflicts.<sup>80</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>81</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>82</sup>

Study authors found that the sport hunting of mountain lions to reduce complaints and livestock depredations had the opposite effect. Killing mountain lions disrupts their social structure and increases both complaints and livestock depredations.<sup>83</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>84</sup>

Similarly, a study published just this year shows the very same result: lethal removal of mountain lions is associated with increased conflicts, especially on small hoofstock including sheep and goats.<sup>85</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>86</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 losses than animals in stable, older populations.<sup>87</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>88</sup> For South Dakota's cattle and sheep ranchers, 2015 data show that most livestock losses came from maladies (illnesses, birthing problems, weather and theft) with far fewer losses coming from native carnivores and domestic dogs together.<sup>89</sup> In 2015, nearly 96 percent of unwanted



cattle losses in South Dakota were from maladies with only 0.17 percent coming from mountain lions, according to the USDA.<sup>90</sup> According to 2014 data, zero sheep were lost to mountain lions in South Dakota.<sup>91</sup>

Rather than allowing trophy hunting of mountain lions, GFP must make a concerted effort to utilize non-lethal methods when rare conflicts occur, prioritizing these above lethal removal of mountain lions. The current reliance on lethal removal for mountain lions that enter a human community is cruel and not in line with best management practices for mountain lion conservation. 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>92</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>93</sup>

Furthermore, GFP must work with livestock owners to ensure they are adequately and appropriately employing non-lethal 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:

- Keep livestock, especially maternity pastures, away from areas where wild cats have access to ambush cover.<sup>94</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>95</sup> The type of enclosure needs to be specific for the carnivore species to prevent climbing, digging or jumping.<sup>96</sup>
- Move calves from pastures with chronic predation problems and replace them with older, less vulnerable animals.<sup>97</sup>
- Concentrate calving season (i.e., via artificial insemination) to synchronize births with wild ungulate birth periods.<sup>98</sup>
- In large landscapes, use human herders, range riders and/or guard animals.<sup>99</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>100</sup>
- Some of the low-cost sound and or visual equipment that deter wild cats include suspended clothing, LED flashing lights (sold as “Foxlights”), and radio alarm boxes set off to make alarm sounds/noises near pastures.<sup>101</sup>

According to USDA data from 2015, only an estimated 11.2 percent of cattle and calf operations in South Dakota used any nonlethal predator control methods.<sup>102</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.

## **V. 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 view or photograph wild



mountain lions. Nonconsumptive users are a rapidly growing stakeholder group who provide immense economic contributions to the communities in which they visit.<sup>103</sup> The U.S. Fish and Wildlife Service’s 2016 wildlife-recreation report 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>104</sup> Altogether, hunters spent \$25.6 billion in 2016, about one-third that spent by wildlife watchers (Fig. 2).<sup>105</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>106</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>107</sup> Surveys also show that the majority of Americans, including in Midwestern states, do not support trophy hunting, and are particularly opposed to mountain lion hunting.<sup>108</sup> Authorizing a trophy hunting season is not in the best interest of South Dakotans who prefer that mountain lions remain on the landscape, without threat of persecution.

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- <sup>64</sup> D. D. Katnik, "Predation and Habitat Ecology of Mountain Lions (*Puma Concolor*) in the Southern Selkirk Mountains [Dissertation]" (Washington State University, 2002).



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<sup>99</sup> Treves and Karanth, "Special Section: Human-Carnivore Conflict: Local Solutions with Global Applications.," "Human-Carnivore Conflict and Perspectives on Carnivore Management Worldwide." Eklund et al., "Limited Evidence on the Effectiveness of Interventions to Reduce Livestock Predation by Large Carnivores." Stone et al., "Adaptive Use of Nonlethal Strategies for Minimizing Wolf-Sheep Conflict in Idaho." M. Parks and T. Messmer, "Participant Perceptions of Range Rider Programs Operating to Mitigate Wolf-Livestock Conflicts in the Western United States," *Wildlife Society Bulletin* 40, no. 3 (2016); W. F. Andelt, "Effectiveness of Livestock Guarding Dogs for Reducing Predation on Domestic Sheep," *ibid.* 20 (1992); W. F. Andelt and S. N. Hopper, "Livestock Guard Dogs Reduce Predation on Domestic Sheep in Colorado," *Journal of Range Management* (2000).

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<sup>102</sup> U.S. Department of Agriculture - Animal and Plant Health Inspection Service, "Death Loss in U.S. Cattle and Calves Due to Predator and Nonpredator Causes, 2015," ed. National Animal Health Monitoring System (Fort Collins, CO2017).

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To: Game Fish and Parks Commission  
Re: Proposed Mountain Lion Hunting Season  
August 24th, 2021

Dear Commissioners,

I am writing to oppose the proposed changes to the Mountain Lion Hunting Season.

I recommend a reduction of harvest limits since South Dakota has a small lion population. The current hunt quota of 60 lions is unsustainable for a population still try to reestablish where it was previously driven to near extinction. These are special species and part of a natural and healthy ecosystem. According to the slide presentation by Andy Lindholm presented at one of your meetings, a more sustainable limit should be to reduce harvests from 60-40 for males and from 40 to 25 female. Total sustainable mortality limits for cougar management needs to monitor the total mortality of cougars, not just from harvest, but also any sort of deaths of cougars from road kills, depredation, or other natural causes. This will give the agency a much clearer picture about how many cougars we have and when hunting need to be limited to make sure we have a robust and sustainable population.

In addition, I strongly oppose the use of hounds for hunting Mountain Lions. The practice of using hounds is not only cruel, but also offers hunters an unfair advantage over lions. Hounds are often equipped with GPS collars which the hunters follow, only to shoot the lion out of a tree. This creates additional unfairness to boot hunters as well. According to your own survey, some hunters commented that “Hounds chase the lions out not give boot hunters a fair chance.”, “Keep season as is, no dogs”. It’s evident that some hunters oppose this practice as well.

I hope over time Game Fish and Parks will begin to realize that the practice to trying to “manage species” is much better off being managed by nature itself.

Thank you,

Caryn Lerman  
Hot Springs, SD  
605-745-5970



# 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 12, 2021

Russell Olson, Chair  
South Dakota Game, Fish and Parks  
221 Lake Ridge Drive  
Wentworth, SD 57075

### **RE: Petition – Mountain Lion Season Restrictions**

Dear Chair Olson 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 for the proposed harvest limits for the upcoming 2021/2022 and 2022/2023 seasons.

South Dakota Game, Fish and Parks (SDGFP) has recommended a harvest limit of 60 mountain lions or 40 female mountain lions for the 2021-2022 *and* the same for the 2022-2023 seasons. This recommendation is aggressive and does not consider basic mountain lion biology for achieving the population objective of a stable population of 200-300 mountain lions in the Black Hills.<sup>1</sup> **We urge the Commission to put an end to mountain lion hunting in the State, or at minimum, to reduce harvest limits to sustainable levels.**

Except in rare instances, mountain lions do not require management to control growth because their populations are self-regulating. This is driven by mountain lion social structure, territoriality, the abundance of prey, and the carrying capacity of the land to support those populations.<sup>2</sup> Additionally, human encroachment on wild land leads to habitat loss and reduced connectivity, resulting in a lower carrying capacity for both predator and prey species.<sup>3</sup>

As outlined in the *South Dakota Mountain Lion Management Plan, 2019-2029*, SDGFP's mountain lion management goals are restricted to the Black Hills ecosystem in western South Dakota.<sup>1</sup> Based on the

<sup>1</sup> South Dakota Game, Fish and Parks. 2019. South Dakota Mountain Lion Management Plan, 2019-2029. [https://gfp.sd.gov/userdocs/docs/LionPlan\\_FINAL\\_DRAFT\\_JULY\\_25.pdf](https://gfp.sd.gov/userdocs/docs/LionPlan_FINAL_DRAFT_JULY_25.pdf)

<sup>2</sup> Wallach, A. D., I. Izhaki, J. D. Toms, W. J. Ripple and U. Shanas. 2015. **What is an apex predator?** *Oikos* 124(11): 1453–1461.

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Saving America's Lion  
Since 1986

amount of suitable mountain lion habitat in the Black Hills, we estimate the carrying capacity for mountain lions in the Black Hills to be about 230 adult mountain lions. This means that, without hunting and by natural processes, mountain lion biology and social structure, the mountain lion population in the Black Hills ecosystem would remain stable at around 230 adult mountain lions. As this number is within the SDGFP population objective of 200-300 mountain lions in the Black Hills, we urge you, the Commission, to protect South Dakota’s small mountain lion population and put an end to trophy hunting in the State.

Mountain lion hunting results in additive mortality – rates that far exceed what would happen in nature – and can lead to population instability and decline.<sup>4</sup> In order to maintain a stable population of mountain lions, prevent human-wildlife conflict, and avoid compromising the long-term viability of mountain lion populations by failing to account for all human-caused sources of mortality, hunting of adult mountain lions should not exceed the intrinsic growth rate of the population of interest.<sup>5</sup> The intrinsic growth rate for mountain lion populations has been established to be 1.14, or 14%.<sup>6</sup> Additionally, when female mountain lion harvest exceeds 20% of total harvest, this is also likely to lead to population instability, as females contribute disproportionately to the population.<sup>5</sup>

When setting harvest limits for mountain lions, one must account for **all** sources of anthropogenic mountain lion mortality, not just harvest mortality. Anthropogenic mortality includes hunting, mountain lions killed for public safety, mountain lions killed for preying on domestic livestock, poaching, vehicle collisions, and more.

The *South Dakota Mountain Lion Management Plan, 2019-2029* cites a “population objective of 200-300 mountain lions in the Black Hills ecosystem of South Dakota”<sup>1</sup> and the *2019 Mountain Lion Population Status Update* reports a population estimate of 203 adult/sub-adult mountain lions in the Black Hills prior to the 2018-2019 season.<sup>6</sup> Since this last published estimate, 120 mountain lions have been killed through hunting, alone (Table 1). These numbers do not account for any other source of human-caused mortality and percentages are based off of the 2018 population estimate of 203 adult/sub-adult mountain lions, therefore, total mortality is likely higher. This is not sustainable.

**Table 1.** South Dakota mountain lion harvest mortality since last published mountain lion population estimate of 203 adult/subadult mountain lions\* in the Black Hills, prior to 2018-2019 season.

Season	Mountain Lions Harvested	Percent of Population*
2018-2019	21	10%
2019-2020	51	25%
2020-August 2021	48	23%

<sup>4</sup> Robinson, H. S. and R. DeSimone. 2011. **The Garnet Range Mountain Lion Study: Characteristics of a Hunted Population in West-Central Montana.** Final Report. Montana Fish, Wildlife & Parks. Helena, MT.

<sup>5</sup> Beausoleil, R.A., G.M. Koehler, B.T. Maletzke, B.N. Kertson and R.B. Wielgus. 2013. Research to Regulation: Cougar Social Behavior as a Guide for Management. *Wildlife Society Bulletin* 37(3):680-688.

<sup>6</sup> South Dakota Game, Fish and Parks. 2019. South Dakota SURVEY REPORT: Mountain Lion Population Update – 2019 Biennial Report. [https://gfp.sd.gov/userdocs/docs/Mountain\\_Lion\\_Status\\_Report\\_2019.pdf](https://gfp.sd.gov/userdocs/docs/Mountain_Lion_Status_Report_2019.pdf)

For perspective, 51 mountain lions were harvested in South Dakota in 2020, and so far this year, 48 mountain lions have been harvested. This could account for more than 25% of the population in the Black Hills *and* this number does not include other human-caused mortality. Therefore, total anthropogenic mortality is likely higher. Despite this, the proposal before you recommends a harvest limit of 60 mountain lions or 40 female mountain lions for each of the next two years! This is **not** sustainable and **not** the way to achieve a stable population objective of 200-300 mountain lions in the Black Hills.

Harvest limits for the upcoming 2021/2022 and 2022/2023 seasons should not exceed 20 total mountain lions or 4 female mountain lions to account for other anthropogenic mortality, to maintain a stable population, and so as not to exceed the intrinsic growth rate of 14%.<sup>6</sup>

South Dakota's small mountain lion population already faces many threats, including aggressive harvest limits that could account for more than 30% of the State's adult mountain lion population. If it is the goal of SDGFP to maintain a stable mountain lion population, then South Dakota's mountain lions must be given more protections, not fewer.

We urge the commission to end mountain lion hunting in South Dakota or, at minimum, to **lower** the harvest limit to 20 mountain lions or 4 female mountain lions, and **not** to approve the proposed hunt limit of 60 mountain lions or 40 female mountain lions for the 2021/2022 and 2022/2023 seasons.

Sincerely,

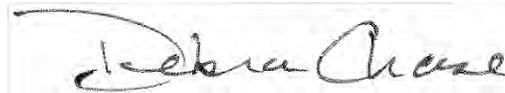


Diana Boyle, M.S.

**Biologist**

M.S. Biodiversity, Ecology & Evolution  
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**CEO**

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SOUTH DAKOTA  
DIVISION

# The Izaak Walton League of America

DEFENDERS OF SOIL, AIR, WOODS, WATERS, AND WILDLIFE

August 27, 2021

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

Dear Commissioners,

The South Dakota Division of the Izaak Walton League of America thanks you for the opportunity to comment on the proposal pertaining to Aquatic Invasive Species (AIS). The Division is very concerned with the spread of AIS in South Dakota and around the nation. We support all measures that limit and restrict movement of AIS to other waters and areas.

The GFP staff recommends an exemption for launching a boat, dock, or boat lift into waters within the state that is not clean, drained, and dried. This allows equipment to be relaunched in the same water if it was stored on the owner's property or at a marina on the same water. The proposal's supporting information also provides an exemption to existing statute allowing lakeshore or riparian property owners to remove AIS plants or mussels in front of their residence without violating the statute. The Division urges the commission to adopt the two exceptions.

However, the Division asks the Department and the Commission to amend this proposal to include language preventing the movement or relocation of boat lifts, docks, or other equipment into another waterbody for a minimum of three weeks. If equipment is sold or transferred to another party that equipment cannot be deployed or relaunched before at least 21 days. This is based on a regulation approved by the Minnesota Department of Natural Resources. *As of July 1, 2012, a boat lift, dock, swim raft, or associated equipment that has been removed from any water body may not be placed in another water body until a minimum of 21 days have passed.* The Division believes this will help to protect South Dakota's waters and prevent the spread of AIS.

The South Dakota Division of the Izaak Walton League of America strongly encourages your serious consideration and adoption of the suggested language. We appreciate the opportunity to comment on this proposal.

Sincerely,

Kelly Kistner  
President IWLA South Dakota Division  
603 Lakeshore Drive  
McCook Lake, SD 57049  
605-232-2030 (H) – 712-490-1726 (C)  
iwlasdpresident@outlook.com

# Public Comments

## Aquatic Invasive Species

---

**Paul Lepisto**

**Pierre SD**

**Position:** support

**Comment:**

On behalf of SD IWLA Division President Kelly Kistner I'm submitting the attached comments on the AIS proposal. We support the proposal but ask for it to be further amended to help protect the health of SD waters.

## Mountain Lion Hunting Season

---

**Rebecca Cooper**

**Summerset SD**

**Position:** oppose

**Comment:**

Oppose using dogs for hunting of mountain lions.

---

**Emily Norman**

**Sisseton SD**

**Position:** oppose

**Comment:**

No comment text provided.

---

**Cathie Llamas**

**Pierre SD**

**Position:** oppose

**Comment:**

Inhumanly strongly opposed to thus

---

**Kim Smith**

**Hartford SD**

**Position:** oppose

**Comment:**

Our state has killed enough wildlife with its predator hunting and mountain lion hunting. The populations on these animals have decreased to the point you dont even see them out in the country. Sad that our state is diminishing our wildlife.

---

**Anita Mason**

**Smithwick SD**

**Position:** oppose

**Comment:**

No comment text provided.

---

**Jeanie Gabert**

**Belle Fourche SD**

**Position:** oppose

**Comment:**

No comment text provided.

---

**Lori Tetreault**

**Whitewood SD**

**Position:** oppose

**Comment:**

These beautiful animals should not be destroyed because hunter's seek them out inhumanely as trophies to satisfy their hunting egos. Please protect these God-given creatures!

---

**John Fitzgerald**

**Hot Springs SD**

**Position:** oppose

**Comment:**

No comment text provided.

---

**Vaughn Boyf**

**Whitewoof SD**

**Position:** oppose

**Comment:**

No comment text provided.

---

---

**Tiffany Carlson**

**Spearfish SD**

**Position:** oppose

**Comment:**

This season is meant for hunting. Hunting involves sport and game, not cornering and killing. Neither the lions or the dogs would benefit from this hunting practice. Cruelty is cruelty...it is not a sport.

---

**Lj Dudley**

**Brookings SD**

**Position:** oppose

**Comment:**

No comment text provided.

---

**Laura Inman**

**Hot Springs SD**

**Position:** oppose

**Comment:**

I do not think that allowing dogs to hunt mountain lions s necessary takes away from the sport of hunting them Endangers the dogs and kitten

---

**Cynthia Herndon**

**Rapid City SD**

**Position:** oppose

**Comment:**

No comment text provided.

---

**Andrea Parker**

**Spearfish SD**

**Position:** oppose

**Comment:**

No comment text provided.

---

**Donna Watson**

**Lead SD**

**Position:** oppose

**Comment:**

No comment text provided.

---

**Penny Nielsen**

**Plankinton SD**

**Position:** oppose

**Comment:**

I feel we do not have a problem with the Mountain Lions we have in this state. They are not over populated and tend to leave people and livestock alone.

---

**Sue Schwaneke**

**Rochford SD**

**Position:** oppose

**Comment:**

Should not allow the use of dogs.

---

**Leslie Crowder**

**Box Elder SD**

**Position:** oppose

**Comment:**

I am opposed to mountain lion hunting seasons, in particular any increase in hunting or especially hound hunting.

---

**Carla Marshall**

**Rapid City SD**

**Position:** oppose

**Comment:**

I'm opposed the Mountain Lion Hunting Season. Stop killing predators that keep the other critters in check.

---

**Denise Reed**

**Sioux Falls SD**

**Position:** oppose

**Comment:**

No comment text provided.

---

**Penelope Maldonado**

**Jackson WY**

**Position:** oppose

**Comment:**

No comment text provided.

---

**Mary Zimmerman**

**Deadwood SD**

**Position:** oppose

**Comment:**

Gf&p needs to stop serving hunters and start following the science which will serve all of us better and over the long term. Please shorten the season and lower the limit of female mt. lions killed.

---

**Joe Kosel**

**Lead SD**

**Position:** oppose

**Comment:**

No comment text provided.

---

## Mountain Lion Season Restrictions

---

**Paula Von Weller**

**Spearfish SD**

**Position:** oppose

**Comment:**

I am strongly opposed to the South Dakota Houndsmen Association's petition that would expand hound hunting of mountain lions throughout the state.

---

**Jennifer Jenkins**

**Tucson AZ**

**Position:** support

**Comment:**

Dear South Dakota Wildlife Management,

Please oppose the South Dakota Houndsmen Association's petition to expand hound hunting of mountain lions in South Dakota and to protect mountain lions from trophy hunting. This is a cruel practice and not only cruel, but will actually increase conflicts with humans over time. South Dakota has a small population of cougars left. This practice will continue to push this top predator to extinction. Doing this destroys our children's chance of enjoying the natural world and sends a message that short-term pleasure in blood sports is more important than anything else. In addition, this may bring short term profits to the state of South Dakota, in the long run, it will do the opposite. Killing off top line predators has proven to be detrimental to the environment which subsequently destroys the economy.

Sincerely,  
Jen

---

**Gwendolyn Oberholtzer**

**Spearfish SD**

**Position:** oppose

**Comment:**

Please oppose the expansion of hound hunting of mountain lions in SD based on the estimated number of mature age lions remaining.

---

**Catherine Cardozo**

**Sacramento CA**

**Position:** oppose

**Comment:**

Please oppose the South Dakota Houndsmen Association's petition to expand hound hunting of mountain lions in South Dakota and to protect mountain lions from trophy hunting. Lions have a right to exist on this earth too.

---

**Lucille Howey**

**Hill City SD**

**Position:** oppose

**Comment:**

No comment text provided.

---

**Penelope Maldonado**

**Jackson WY**

**Position:** oppose

**Comment:**

No comment text provided.

---

**Mary Zimmerman**

**Deadwood SD**

**Position:** oppose

**Comment:**

No comment text provided.

---

**Joe Kosel**

**Lead SD**

**Position:** oppose

**Comment:**

No comment text provided.



August 28, 2021

**TO:** South Dakota Game Fish & Parks Commission

**FROM:** South Dakotans Fighting Animal Cruelty Together (SD FACT)

**RE:** Proposed 2021-2022 and 2022-2023 Mountain Lion Hunting Seasons

Dear Chairman Olson, Director Kirschenmann and Members of the Commission,

SD FACT is opposed to the mountain lion hunting season as proposed. We share the concerns of our fellow opponents and their thorough citations to the science of this issue.

In our view, like the nest predator bounty program, GFP is focused more on recreation and profit than preservation of our unique, necessary predators. They are a collective state resource being wasted for unscientific reasons. The focus of debate at these meetings rarely touches upon community safety or the preservation of life under the board's stewardship. The simplistic and false equation of eradication of predators by man equals more pheasants or elk to kill by man is dangerously misguided and potentially fatal to our shared ecosystem.

The current commitment to eradication is pervasive in our GFP representation. We stand as South Dakotans who you also have the privilege and responsibility to represent. We recognize we all live amongst and entwined with the unique life of this area. We wish to express our deep desire that you see the lives of these fellow animals as deserving of respect beyond their value as human recreation.

Respectfully submitted on behalf of the SD FACT Board of Directors,

Joe Kosel, Lead  
Sara Parker, Sioux Falls  
Shari Kosel, Lead

sdfact.org  
11201 Juniper Court  
Lead, SD 57754

August 28<sup>th</sup> 2021



Board of Directors  
Marc Bekoff, Ph.D.  
Patricio Robles Gil  
Jane Goodall, Ph.D., DBE  
Rick Hopkins, Ph.D.  
Cara Blessley Lowe  
Thomas D. Mangelsen,  
Ph.D.  
Corinne R. Rutledge

Dear Commissioners,

Thank you for taking the time to read the comments of The Cougar Fund on the South Dakota Mountain Lion season setting decision.

We have followed the monitoring and management policies of South Dakota Game Fish and Parks (SDGFP) closely since the inception of mountain lion hunting in 2005. We have always had excellent communication with your staff, who have responded to our questions promptly and respectfully. They have provided thorough explanations to our enquiries, and even though we have deep and fundamental differences, their professionalism has led to shared exploration of each other's perspectives.

We continue to be concerned about the high proportion of female lions that are taken. Killing of sub adult females that have not yet reached sexual maturity limit reproduction going forward. Killing mature females, which, as we know, will be either pregnant or have dependent young at side for up to 70% of their lives, increases the risk of either orphaning vulnerable kittens to starve or be predated, or emancipating older kittens that may find their way into conflict situations in order to survive. No other wild animal is hunted while with dependent young.

We watched the presentation to the commission and noted, during the question-and-answer session, that if the current female sub-quota of 40 is met for the next two-year cycle, then negative pressure would be put on the population. Please also consider the impact of stochastic events during these times of climate volatility and the prevalence of wildfire in addition to the harvest mortality limit.

Therefore, on behalf of our members in South Dakota, we respectfully ask that you please,

- reduce the female sub-quota
- do not expand hound hunting by continuation onto other lands and jurisdictions. Mountain lions once roamed all the lower 48 and just as South Dakota accommodated a successful recovery, other states to the east with suitable habitat will also be places that native species can return to.

Thank you for your consideration of these requests.

Respectfully Submitted,

Penelope Maldonado  
Executive Director, The Cougar Fund  
[penny@cougarfund.org](mailto:penny@cougarfund.org) 307 733 0797



# 2021 RINGNECK OUTLOOK

HUNT THE GREATEST IN SOUTH DAKOTA



## COUNTING DOWN THE DAYS TO **PHEASANT SEASON**

The 2021 pheasant hunting season is fast approaching, and it's time to make plans to hit the field! Thanks to a mild winter, the state's predator control, and enhanced habitat efforts, hunters should find plenty of pheasants this season. Regardless of the dry conditions over the summer, hunters who adjust their tactics and put in their work scouting should enjoy a successful season!

### HUNTING FORECAST

A mild winter resulted in high upland game bird survival across the landscape, and while the drought conditions can make brood survival difficult, there are still plenty of birds available to hunters. Expect both pheasant and grouse populations to be older with more experienced birds. The wariness of adult birds can make hunting more challenging, so hunters will need to pay attention to the details to ensure success.

MARK YOUR CALENDARS

**OCT. 16 - JAN. 31**

TRADITIONAL PHEASANT HUNTING SEASON

## 2020 HARVEST STATISTICS



**1,108,420**

Pheasants Harvested

**121,331**

Total Hunters

### HUNTING CONDITIONS

Conditions are setting up for an early crop harvest, which should put birds in predictable areas earlier in the season. Focus on areas that have abundant public hunting opportunities within the primary pheasant range and find pieces of ground with adequate cover and minimal hunting pressure, if possible. Look for birds in the grasslands in the early fall and cattail sloughs and heavy cover beginning around Thanksgiving.

# 2021 RINGNECK OUTLOOK

HUNT THE GREATEST IN SOUTH DAKOTA

## RECREATE RESPONSIBLY IN THE FIELD

Recreating responsibly is critical. Hunters will need to do their part to prevent fire on the landscape. Bring extra water, a shovel, and always know where you are in case you need to report a fire. Avoid parking on tall vegetation, ensure trailer chains are not dragging, and extinguish cigarettes in the vehicle or with water. Be sure to pack extra water for your dog and do not keep them out in the heat for long periods of time.

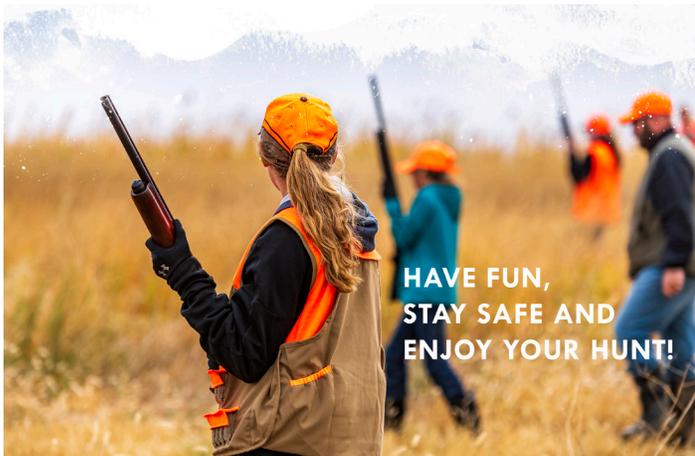
**“South Dakota is the greatest place in the world to hunt pheasants and that all comes back to our quality habitat and millions of acres of public hunting opportunities. Whether your hunting preference is sloughs, grasslands, woody habitat, or the rolling prairies, you will have an abundance of options, and you will not regret putting our state at the top of your list.”**

*Kevin Robling, GFP Department Secretary*

## WHERE TO HUNT



Great pheasant hunting means great hunting land. South Dakota has incredible amounts of quality public land across the landscape, with plenty in the primary pheasant range. Pick up a copy of the 2021 Public Hunting Atlas or visit our website at [gfp.sd.gov/hunting-areas](http://gfp.sd.gov/hunting-areas) to begin planning your fall hunting trip.



## PREMIERE OUTDOOR DESTINATION

- » South Dakota is one of the few places in the world where you can bag the upland bird trifecta - sharp-tailed grouse, greater prairie chicken, and pheasant when hunting the right area.
- » Excellent walleye and panfishing on the Missouri River and in the Glacial Lakes region presents the perfect opportunity to rest your legs and wet some lines!
- » Many state parks offer camping sites, camping and modern cabins, and lodge opportunities to complete your outdoor adventure as well as offer fun for the whole family!

## PLAN YOUR GREATEST HUNT

Are you planning your hunt in South Dakota? We've got you covered!

### Do-It-Yourself Adventure

Are you looking for a DIY adventure, but aren't sure where to start? South Dakota is home to abundant pheasant hunting lands and opportunities. It can be hard to narrow down where you want to go. Check out the pheasant distribution map to see where the primary range is found across South Dakota. You can also learn more about the different types of areas to hunt in South Dakota at [travelsouthdakota.com/recreation/hunting/region-breakdowns](http://travelsouthdakota.com/recreation/hunting/region-breakdowns).

### Full-Service Experience

South Dakota is home to numerous hunting lodges and guided hunt opportunities. If you are looking for sure fire action, this could be the type of hunt for you! Learn more about lodges and guided hunts in South Dakota at [travelsouthdakota.com/recreation/hunting/lodge-hunt](http://travelsouthdakota.com/recreation/hunting/lodge-hunt).



## PHEASANT DISTRIBUTION

Primary pheasant range is in central and eastern South Dakota, though there are pockets of excellent pheasant hunting in the western part of the state.

**GAME, FISH AND PARKS COMMISSION ACTION  
FINALIZATION**

**Park license and trail use pass**

Chapters 41:03:03

<b>Commission Meeting Dates:</b>	<b>Proposal</b>	September 1, 2021	Rapid City
	<b>Public Hearing</b>	October 7, 2021	Deadwood
	<b>Finalization</b>	October 7, 2020	Deadwood

**COMMISSION PROPOSAL**

Recommended changes:

**41:03:03:06.01. Annual park entrance license and annual trail use pass validity and expiration date.** The annual park entrance license and annual trail use pass are valid during the following periods of time:

- (1) ~~Three months immediately~~ The date it was sold through the remainder of the preceding calendar year for which it is issued designated;
- (2) The calendar year for which it is issued designated; and
- (3) Through the Sunday preceding Memorial Day weekend of the year following the year for which it is issued designated.

**Source:** 17 SDR 78, effective October 1, 1991; 20 SDR 150, effective March 23, 1994; 39 SDR 10, effective August 1, 2012.

**General Authority:** SDCL [41-17-1.1\(2\)](#).

**Law Implemented:** SDCL [41-17-1.1\(2\)](#), [41-17-13](#).

**SUPPORTIVE INFORMATION**

The current rule allows for the sale of an annual park entrance license exactly three months prior to January 1 of the year for which it is designated, which is October 1. Allowing for some flexibility with the issue date will help meet customer expectations in those years when it makes sense to issue licenses prior to October 1.

**APPROVE**       **MODIFY**       **REJECT**       **NO ACTION**

**GAME, FISH AND PARKS COMMISSION ACTION  
FINALIZATION**

**Camping permits and rules**

Chapters 41:03:04

<b>Commission Meeting Dates:</b>	<b>Proposal</b>	September 1, 2021	Rapid City
	<b>Public Hearing</b>	October 7, 2021	Deadwood
	<b>Finalization</b>	October 7, 2020	Deadwood

**COMMISSION PROPOSAL**

**41:03:04:03. Camping permit fees.** The daily fee for the use of a campground site by one camper unit is as follows:

(1) Custer State Park modern campground fee, \$26, including State Game Lodge; Sylvan Lake; Grace Coolidge; Legion Lake; Stockade North; Stockade South; and Blue Bell;

(2) Modern campground fee, \$16, including Platte Creek; Swan Creek; West Whitlock; Indian Creek; Okobojo Point; Cow Creek; and West Pollock;

(3) Custer State Park semimodern campground fee, \$19 for Center Lake;

(4) Basic campground fee, \$11, including Burke Lake; Shadehill-Llewellyn Johns Memorial; Bear Butte Lake unit; Lake Hiddenwood; Sand Creek; East Whitlock; Tabor; North Wheeler; Spring Creek; Oakwood primitive area; Lake Carthage; South Shore; Whetstone Bay; South Scalp Creek; White Swan; Walth Bay; Dude Ranch; Elm Creek; Sheps Canyon Lakeside Use Area; and Amsden Dam;

(5) Custer State Park French Creek natural area, seven dollars for each person;

(6) Use of a campground site at Fort Sisseton during the annual Fort Sisseton Festival, \$25, provided that participants and festival campers are exempt from paying the camping fee;

(7) Equestrian campground fee, \$18, including Bear Butte Horse Camp and Sica Hollow Horse Camp. For Lewis and Clark Horse Camp, Newton Hills Horse Camp, Oakwood Lakes Horse Camp, Pease Creek Horse Camp, Pelican Lake Horse Camp, Union Grove Horse Camp, and Sheps Canyon Horse Camp the camping fee is \$22;

(8) Preferred campground fee, \$19, including Fisher Grove; Buryanek; Oahe Downstream; Springfield; and West Bend; ~~and Randall Creek~~;

(9) Prime ~~campsite~~ campground fee, \$22, including all campsites furnished with sewer, water, and electrical service; Lewis and Clark; Chief White Crane; Angostura including Sheps Canyon; Palisades; Big Sioux; Lake Vermillion; Rocky Point; Mina Lake; Lake Herman; North Point; Walker's Point; Lake Poinsett; Oakwood Lakes; South Pelican; Newton Hills; Shadehill Ketterlings Point; Pickerel Lake; Lake Cochrane; Sandy Shore; Pierson Ranch; Union Grove; Richmond Lake; Pease Creek; Lake Thompson; Roy Lake; Farm Island; Snake Creek; Lake Louise; Hartford Beach; Randall Creek; and Fort Sisseton, except during the Fort Sisseton Festival in accordance with subdivision (6) of this section;

## GAME, FISH AND PARKS COMMISSION ACTION FINALIZATION

(10) Custer State Park, French Creek Horse Camp fee, ~~\$34~~36;

(11) Campsites designated for tent camping only, regardless of campground designation, \$15.

An additional charge of four dollars per unit is made for campground sites with electricity.

A resident of this state who may purchase a camping permit and campsite electrical service for one-half price pursuant to SDCL [41-17-13.4](#) shall submit written verification of that status from the United States Veterans Administration to the licensing office of the department in Pierre. The licensing office shall send the resident a billfold-size card to use as proof of eligibility for half-price camping fees.

The nonprofit youth group camping fee is fifty cents for each person or six dollars, whichever is greater.

The Custer State Park group camping area fee, seven dollars a person for overnight use with a minimum fee of \$140.

**Source:** SL 1975, ch 16, § 1; 1 SDR 30, effective October 13, 1974; 2 SDR 90, effective July 11, 1976; 3 SDR 73, effective April 25, 1977; 6 SDR 96, effective April 1, 1980; 7 SDR 69, effective January 25, 1981; 8 SDR 170, effective June 20, 1982; 9 SDR 147, effective May 22, 1983; 10 SDR 73, effective January 17, 1984; 10 SDR 76, 10 SDR 102, effective July 1, 1984; 11 SDR 156, effective May 27, 1985; 13 SDR 128, effective March 22, 1987; 13 SDR 192, effective June 22, 1987; 14 SDR 14, effective August 6, 1987; 14 SDR 81, effective December 10, 1987; 14 SDR 114, effective March 9, 1988; 14 SDR 164, effective June 16, 1988; 15 SDR 139, effective March 20, 1989; 16 SDR 114, effective January 18, 1990; 16 SDR 135, effective February 18, 1990; 17 SDR 12, effective July 31, 1990; 17 SDR 139, effective March 21, 1991; 17 SDR 170, effective May 14, 1991; 17 SDR 188, effective June 13, 1991, and July 1, 1991; 18 SDR 98, effective December 12, 1991; 18 SDR 144, effective March 15, 1992; 19 SDR 82, effective December 7, 1992; 19 SDR 190, effective June 15, 1993; 20 SDR 150, effective March 23, 1994; 21 SDR 86, effective November 10, 1994; 21 SDR 148, effective March 6, 1995; 22 SDR 82, effective December 10, 1995; 22 SDR 89, effective December 26, 1995; 23 SDR 87, effective December 3, 1996; 23 SDR 197, effective May 27, 1997; 24 SDR 99, effective February 2, 1998; 24 SDR 107, effective February 26, 1998; 24 SDR 156, effective May 17, 1998; 25 SDR 108, effective February 28, 1999; 25 SDR 141, effective May 27, 1999; 26 SDR 41, effective September 28, 1999; 26 SDR 85, effective December 26, 1999; 26 SDR 117, effective March 16, 2000; 26 SDR 162, effective June 14, 2000; 27 SDR 49, effective November 16, 2000; 27 SDR 85, effective February 26, 2001; 28 SDR 103, effective January 30, 2002; 29 SDR 80, effective December 10, 2002; 30 SDR 99, effective December 22, 2003; 30 SDR 171, effective May 11, 2004; 31 SDR 62, effective November 4, 2004; 32 SDR 109, effective December 27, 2005; 32 SDR 128, effective January 31, 2006; 33 SDR 107, effective December 27, 2006; 33 SDR 180, effective May 7, 2007; 33 SDR 225, effective June 25, 2007; 34 SDR 179, effective December 24, 2007; 36 SDR 112, effective January 11, 2010; 37 SDR 112, effective December 8, 2010; 38 SDR 101, effective December 5, 2011; 39 SDR 32, effective September 5, 2012; 39 SDR 100, effective December 3, 2012; 39 SDR 204, effective June 11, 2013; 40 SDR 113, effective December 16, 2013; 41 SDR 93, effective December 3, 2014; 44 SDR 93, effective December 4, 2017; 45 SDR 89, effective December 31, 2018; 46 SDR 74, effective December 2, 2019; 47 SDR 68, effective December 9, 2020.

**General Authority:** SDCL [41-17-1.1\(7\)](#), [41-17-13.4](#).

**Law Implemented:** SDCL [41-2-24](#), [41-17-1.1\(7\)](#), [41-17-13.4](#).

**GAME, FISH AND PARKS COMMISSION ACTION  
FINALIZATION**

**DEPARTMENT RECOMMENDATION**

RECOMMENDED CHANGES FROM PROPOSAL – (9) “campsite” changed to “campground” to be consistent with the rest of the rule.

**SUPPORTIVE INFORMATION**

Dude Ranch, Elm Creek, and Sheps Canyon Lakeside Use Areas seeing increasing camping use. These areas currently allow free. With the increased use, comes increased need for basic services such as designated camp pads, fire grates, and picnic tables.

Under definition in 41:03:04:01, a prime campground means a modern campground with weekend occupancy of and greater than 90 percent from the Friday before Memorial Day through Labor Day on non-equestrian and electrical campsites. The campground at Randall Creek has exceeded the 90% occupancy rate which would necessitate reclassifying it from a preferred to a prime campground.

The camping fee for the Custer State Park French Creek Horse Camp was approved for an increase from \$31 to \$36 by the Commission in October of 2019. The increase was inadvertently omitted from the package that went to the Interim Legislative Rules Committee in November 2019.

**APPROVE**       **MODIFY**       **REJECT**       **NO ACTION**

**GAME, FISH AND PARKS COMMISSION ACTION  
FINALIZATION**

**Camping permits and rules**  
Chapters 41:03:04

<b>Commission Meeting Dates:</b>	<b>Proposal</b>	September 1, 2021	Rapid City
	<b>Public Hearing</b>	October 7, 2021	Deadwood
	<b>Finalization</b>	October 7, 2020	Deadwood

**COMMISSION PROPOSAL**

Recommended changes:

**41:03:04:12. Checkout times enforced.** On the day that valid permit expires, a person may not occupy a designated campsite after 4:00 p.m. in the state park system, except Custer State Park. At Custer State Park, a person may not occupy a designated campsite after 12:00 p.m. on the day that a valid camping permit expires unless permission is obtained from an authorized representative of the department. A person may not occupy a camping cabin, ~~after 12:00 p.m. on the day a valid cabin permit expires in the state park system and a person may not occupy a suite,~~ lodge, or modern cabin after 11:00 a.m. on the day that a valid lodging permit expires unless permission is obtained from an authorized representative of the department.

**Source:** 22 SDR 111, effective March 7, 1996; 38 SDR 101, effective December 5, 2011; 46 SDR 74, effective December 2, 2019.

**General Authority:** SDCL [41-17-1.1\(1\)](#).

**Law Implemented:** SDCL [41-17-1.1\(1\)](#).

**SUPPORTIVE INFORMATION**

This proposed change will make check out times for all lodging (camping cabins, lodges, suites and modern cabins) consistent with each other at 11:00 a.m. This will hopefully reduce confusion with customers and better allow park staff to schedule cleaning services between stays.

**APPROVE**       **MODIFY**       **REJECT**       **NO ACTION**

Division of Parks and Recreation					
September Revenue by Item					
	2020		2021		%
	Number	Dollar	Number	Dollar	Change
Annual	5,023	\$ 180,816	5,790	\$ 208,432	15%
2nd Annual	830	\$ 14,938	627	\$ 11,278	-25%
Combo	2,533	\$ 136,764	3,447	\$ 186,128	36%
Transferable	30	\$ 2,400	33	\$ 2,640	10%
Daily License	17,622	\$ 140,974	15,668	\$ 125,342	-11%
Unattended Vehicle Daily	383	\$ 5,747	239	\$ 3,580	-38%
GSM Annual Trail Pass	378	\$ 5,670	619	\$ 9,285	64%
GSM Daily Trail Pass	3,635	\$ 14,540	3,693	\$ 14,772	2%
Motorcoach Permit	1,705	\$ 5,115	3,735	\$ 11,206	119%
CSP 7 Day Pass	37,422	\$ 748,439	38,362	\$ 767,242	3%
CSP 7 Day Bike Pass	2,739	\$ 54,770	2,782	\$ 55,640	2%
Rally Bike Band	-				
One-Day Special Event		\$ 900	73	\$ 1,450	61%
<b>PERMITS</b>	<b>72,299</b>	<b>\$ 1,311,073</b>	<b>75,066</b>	<b>\$ 1,396,995</b>	<b>7%</b>
Camping Services		\$ 902,986		\$ 890,439	-1%
Picnic Reservations		\$ 510		\$ 561	10%
Firewood	8,062	\$ 48,370	6,699	\$ 40,193	-17%
Gift Card		\$ 170		\$ 505	197%
Boat Slips		\$ -		\$ 361	
<b>LODGING</b>	<b>8,062</b>	<b>\$ 952,036</b>	<b>6,699</b>	<b>\$ 932,058</b>	<b>-2%</b>
<b>TOTAL</b>	<b>80,360</b>	<b>\$ 2,263,109</b>	<b>81,765</b>	<b>\$ 2,329,053</b>	<b>3%</b>

Division of Parks and Recreation					
September YTD 2021 Revenue by Item					
	2020		2021		%
	Number	Dollar	Number	Dollar	Change
Annual	61,459	\$ 2,212,527	60,552	\$ 2,179,884	-1%
2nd Annual	12,135	\$ 218,438	11,500	\$ 207,000	-5%
Combo	31,150	\$ 1,682,110	34,714	\$ 1,874,564	11%
Transferable	2,312	\$ 150,299	2,341	\$ 187,254	25%
Daily License	126,195	\$ 1,009,562	109,082	\$ 872,656	-14%
Unattended Vehicle Daily	2,311	\$ 34,666	1,769	\$ 26,542	-23%
GSM Annual Trail Pass	5,122	\$ 76,830	5,439	\$ 81,585	6%
GSM Daily Trail Pass	13,074	\$ 52,296	15,761	\$ 63,044	21%
Motorcoach Permit	5,604	\$ 16,812	19,031	\$ 57,092	240%
CSP 7 Day Pass	165,987	\$ 3,319,738	216,236	\$ 4,324,727	30%
CSP 7 Day Bike Band	19,118	\$ 382,355	21,990	\$ 439,790	15%
Rally Bike Band	29,638	\$ 592,752	31,760	\$ 635,200	7%
One-Day Special Event		\$ 3,300		\$ 6,250	89%
<b>PERMITS</b>	<b>474,106</b>	<b>\$ 9,751,685</b>	<b>530,175</b>	<b>\$ 10,955,587</b>	<b>12%</b>
Camping Services		\$ 12,070,847		\$ 12,916,252	7%
Picnic Reservations		\$ 9,540		\$ 14,992	57%
Firewood	50,942	\$ 305,652	40,438	\$ 242,625	-21%
Gift Card		\$ 6,988		\$ 7,835	12%
Boat Slips		\$ 144,735		\$ 216,250	49%
<b>LODGING</b>	<b>50,942</b>	<b>\$ 12,537,762</b>	<b>40,438</b>	<b>\$ 13,397,954</b>	<b>7%</b>
<b>TOTAL</b>	<b>525,048</b>	<b>\$ 22,289,447</b>	<b>570,613</b>	<b>\$ 24,353,541</b>	<b>9%</b>

**Division of Parks and Recreation**  
**September YTD 2021 Camping by District**

<i>LOCATION</i>	<i>2020</i>	<i>2021</i>	<i>%</i>	<i>LOCATION</i>	<i>2020</i>	<i>2021</i>	<i>%</i>
Pickereel Lake	5,854	5,716	-2%	Lewis & Clark	46,145	45,787	-1%
Fort Sisseton	1,258	1,419	13%	Chief White Crane	13,220	13,518	2%
Roy Lake	7,777	8,504	9%	Pierson Ranch	5,430	5,332	-2%
Sica Hollow	376	256	-32%	Springfield	1,459	1,488	2%
<b>DISTRICT 1</b>	<b>15,265</b>	<b>15,895</b>	<b>4%</b>	Sand Creek	96	91	-5%
Richmond Lake	1,756	1,838	5%	Tabor	36	37	3%
Mina Lake	3,047	3,340	10%	<b>DISTRICT 9</b>	<b>66,386</b>	<b>66,253</b>	<b>0%</b>
Fisher Grove	1,281	1,274	-1%	North Point	10,836	10,617	-2%
Amsden	269	276	3%	North Wheeler	895	1,024	14%
Lake Louise	2,297	2,217	-3%	Pease Creek	1,654	2,005	21%
<b>DISTRICT 2</b>	<b>8,650</b>	<b>8,945</b>	<b>3%</b>	Randall Creek	5,091	7,825	54%
Pelican Lake	6,201	6,617	7%	South Shore	673	406	-40%
Sandy Shore	1,754	1,825	4%	South Scalp	56	105	88%
Lake Cochrane	2,384	2,361	-1%	Whetstone	649	511	-21%
Hartford Beach	7,304	6,648	-9%	White Swan	309	185	-40%
<b>DISTRICT 3</b>	<b>17,643</b>	<b>17,451</b>	<b>-1%</b>	<b>DISTRICT 10</b>	<b>20,163</b>	<b>22,678</b>	<b>12%</b>
Oakwood Lakes	10,167	9,759	-4%	Farm Island	7,727	8,342	8%
Lake Poinsett	8,678	8,841	2%	West Bend	8,714	9,098	4%
Lake Thompson	7,264	7,861	8%	<b>DISTRICT 11</b>	<b>16,441</b>	<b>17,440</b>	<b>6%</b>
<b>DISTRICT 4</b>	<b>26,109</b>	<b>26,461</b>	<b>1%</b>	Oahe Downstream	14,242	14,935	5%
Lake Herman	5,528	6,339	15%	Cow Creek	3,545	3,788	7%
Walker's Point	3,126	3,301	6%	Okobojo	2,378	2,067	-13%
Lake Carthage	1,138	947	-17%	Spring Creek	788	1,024	30%
<b>DISTRICT 5</b>	<b>9,792</b>	<b>10,587</b>	<b>8%</b>	<b>DISTRICT 12</b>	<b>20,953</b>	<b>21,814</b>	<b>4%</b>
Snake Creek	9,212	8,917	-3%	West Whitlock	5,078	5,485	8%
Platte Creek	2,044	1,839	-10%	East Whitlock	108	76	-30%
Buryanek	2,757	2,834	3%	Swan Creek	1,010	972	-4%
Burke Lake	67	74	10%	Indian Creek	7,901	8,233	4%
<b>DISTRICT 6</b>	<b>14,080</b>	<b>13,664</b>	<b>-3%</b>	Lake Hiddenwood	-	-	
Palisades	5,749	5,215	-9%	Walth Bay	48	16	-67%
Big Sioux	6,222	7,194	16%	West Pollock	1,489	1,303	-12%
Lake Vermillion	10,006	12,161	22%	<b>DISTRICT 13</b>	<b>15,634</b>	<b>16,085</b>	<b>3%</b>
<b>DISTRICT 7</b>	<b>21,977</b>	<b>24,570</b>	<b>12%</b>	Bear Butte	1,250	1,491	19%
Newton Hills	10,915	11,688	7%	<b>DISTRICT 14</b>	<b>1,250</b>	<b>1,491</b>	<b>19%</b>
Good Earth	-	-		Shadehill	6,283	6,865	9%
Union Grove	1,622	1,662	2%	Llewellyn Johns	532	586	10%
<b>DISTRICT 8</b>	<b>12,537</b>	<b>13,350</b>	<b>6%</b>	Rocky Point	7,010	7,138	2%
				<b>DISTRICT 15</b>	<b>13,825</b>	<b>14,589</b>	<b>6%</b>
				Custer	53,536	54,654	2%
				<b>DISTRICT 16</b>	<b>53,536</b>	<b>54,654</b>	<b>2%</b>
				Angostura	20,675	21,060	2%
				Sheps Canyon	2,313	2,384	3%
				<b>DISTRICT 17</b>	<b>22,988</b>	<b>23,444</b>	<b>2%</b>
				<b>TOTAL YTD</b>	<b>357,229</b>	<b>369,371</b>	<b>3%</b>
				<b>TOTAL for Month</b>	<b>56,494</b>	<b>55,261</b>	<b>-2%</b>

Boy Scouts of America Property  
Lincoln County, SD

Johnson GPA

BSA  
property

Newton Hills State Park

McKee GPA

Pattee Creek GPA



<b>Game Production Area</b>	<b>County</b>	<b>Acres</b>	<b>Appraised Value</b>	<b>Auction Sale Price</b>
West Lake Poinsett	Hamlin	40	\$100,000.00	\$520,000.00
Mallard Slough	Beadle	80	\$56,000.00	\$56,000.00
Schartner Ditch	Turner	10	\$30,000.00	\$77,500.00
South Buffalo Lake East	Marshall	60	\$48,000.00	\$48,000.00
Mondry Portion of Pickerel GPA	Day	7.5	\$112,500.00	\$265,000.00
North Sanborn	Sanborn	51	\$137,000.00	\$137,000.00
		248.5	\$483,500.00	\$1,103,500.00

# License Sales Totals

(as of Sept 30)

date updated: 1 October 2021

Resident	2018	2019	2020	3-yr Avg	2021	2021			+/- Licenses		+/- Revenue		% Change from 3-yr Avg
						Revenue	2020 vs 2021	3-yr Avg vs 2021	2020 vs 2021	3-yr Avg vs 2021			
Combination	42,796	40,972	45,109	42,959	46,326	\$ 2,547,930	1,217	3,367	\$ 66,935	\$ 185,185	8%		
Junior Combination	6,149	5,814	7,955	6,639	5,649	\$ 152,523	-2,306	-990	\$ (62,262)	\$ (26,739)	-15%		
Senior Combination	9,030	9,184	10,150	9,455	10,939	\$ 437,560	789	1,484	\$ 31,560	\$ 59,373	16%		
Small Game	4,469	4,003	4,424	4,299	4,222	\$ 139,326	-202	-77	\$ (6,666)	\$ (2,530)	-2%		
Youth Small Game	2,164	1,914	2,123	2,067	2,514	\$ 12,570	391	447	\$ 1,955	\$ 2,235	22%		
1-Day Small Game	221	290	286	266	434	\$ 5,208	148	168	\$ 1,776	\$ 2,020	63%		
Migratory Bird Certificate	21,413	20,187	21,620	21,073	21,188	\$ 105,940	-432	115	\$ (2,160)	\$ 573	1%		
Predator/Varmint	1,304	1,265	1,368	1,312	1,163	\$ 5,815	-205	-149	\$ (1,025)	\$ (747)	-11%		
Furbearer	2,791	3,039	3,076	2,969	3,634	\$ 109,020	558	665	\$ 16,740	\$ 19,960	22%		
Annual Fishing	56,438	51,729	66,881	58,349	54,944	\$ 1,538,432	-11,937	-3,405	\$ (334,236)	\$ (95,349)	-6%		
Senior Fishing	12,837	12,555	14,473	13,288	13,784	\$ 165,408	-689	496	\$ (8,268)	\$ 5,948	4%		
1-Day Fishing	5,274	5,287	6,676	5,746	5,973	\$ 47,784	-703	227	\$ (5,624)	\$ 1,819	4%		
<b>RESIDENT TOTALS =</b>	<b>164,886</b>	<b>156,239</b>	<b>184,141</b>	<b>168,422</b>	<b>170,770</b>	<b>\$ 5,267,516</b>	<b>-13,371</b>	<b>2,348</b>	<b>\$ (301,275)</b>	<b>\$ 151,748</b>	<b>1.4%</b>		

Nonresident	2018	2019	2020	3-yr Avg	2021	2021			+/- Licenses		+/- Revenue		% Change from 3-yr Avg
						Revenue	2020 vs 2021	3-yr Avg vs 2021	2020 vs 2021	3-yr Avg vs 2021			
Small Game	5,245	5,432	6,071	5,583	9,731	\$ 1,177,451	3,660	4,148	\$ 442,860	\$ 501,948	74%		
Youth Small Game	266	214	277	252	457	\$ 4,570	180	205	\$ 1,800	\$ 2,047	81%		
Annual Shooting Preserve	130	126	144	133	191	\$ 23,111	47	58	\$ 5,687	\$ 6,978	43%		
5-day Shooting Preserve	2,604	2,694	2,581	2,626	3,547	\$ 269,572	966	921	\$ 73,416	\$ 69,971	35%		
1-day Shooting Preserve	449	374	336	386	464	\$ 21,344	128	78	\$ 5,888	\$ 3,573	20%		
Spring Light Goose	4,714	2,810	2,961	3,495	4,487	\$ 224,350	1,526	992	\$ 76,300	\$ 49,600	28%		
Youth Spring Light Goose	179	94	122	132	161	\$ 4,186	39	29	\$ 1,014	\$ 763	22%		
Migratory Bird Certificate	823	872	1,270	988	2,962	\$ 14,810	1,692	1,974	\$ 8,460	\$ 9,868	200%		
Predator/Varmint	4,649	4,282	3,855	4,262	3,927	\$ 157,080	72	-335	\$ 2,880	\$ (13,400)	-8%		
Furbearer	5	7	7	6	5	\$ 1,375	-2	-1	\$ (550)	\$ (367)	-21%		
Annual Fishing	25,605	22,441	27,025	25,024	31,749	\$ 2,127,183	4,724	6,725	\$ 316,508	\$ 450,597	27%		
Family Fishing	8,688	7,966	9,815	8,823	7,560	\$ 506,520	-2,255	-1,263	\$ (151,085)	\$ (84,621)	-14%		
Youth Annual Fishing	1,223	1,099	1,455	1,259	1,142	\$ 28,550	-313	-117	\$ (7,825)	\$ (2,925)	-9%		
3-Day Fishing	22,973	21,243	20,417	21,544	18,513	\$ 684,981	-1,904	-3,031	\$ (70,448)	\$ (112,159)	-14%		
1-Day Fishing	18,658	18,259	28,262	21,726	34,513	\$ 552,208	6,251	12,787	\$ 100,016	\$ 204,587	59%		
<b>NONRESIDENT TOTALS =</b>	<b>96,211</b>	<b>87,913</b>	<b>104,598</b>	<b>96,241</b>	<b>119,409</b>	<b>\$ 5,797,291</b>	<b>14,811</b>	<b>23,168</b>	<b>\$ 804,921</b>	<b>\$ 1,086,459</b>	<b>24.1%</b>		
<b>GRAND TOTALS =</b>	<b>261,097</b>	<b>244,152</b>	<b>288,739</b>	<b>264,663</b>	<b>290,179</b>	<b>\$ 11,064,807</b>	<b>1,440</b>	<b>25,516</b>	<b>\$ 503,646</b>	<b>\$ 1,238,207</b>	<b>9.6%</b>		

	2020	2021	+/- Licenses		+/- Revenue	2021 Revenue
Resident Habitat Stamp	39,744	146,582	106,838	\$	1,068,380	\$ 1,465,820
Nonresident Habitat Stamp	25,357	91,036	65,679	\$	1,641,975	\$ 2,275,900
Totals =	65,101	237,618	172,517	\$	2,710,355	\$ 3,741,720