

Re state park fees

2900 Poplar Dr
Sioux Falls SD 57105
27 September 2019

To the SD Game, Fish, and Park Commission,

This input is to suggest changing the proposal for the increased park fees.

The news article I see indicates that the fee increase would generate about \$3 million additional revenue. It says some of this revenue is needed is for repairs due to storms, while some is for the increasing costs that would have been needed anyway even without the storms.

My suggestion: If the fees must be increased, please determine what portion of the needed funding is for the storm repairs. That portion of the funding should come from state reserve funds. Note that the state's reserves are often referred to as "rainy day funds". The recent floods certainly were "rainy days"! Very rainy! It is not fair to ask park users to pay the part of the increase that is due to the recent floods. That should be on all of us. If \$8 million is needed for storm damage repairs, take the whole \$8 million from reserves and get it done.

In this way, the fee increases could be less. Such as: perhaps the park sticker could be \$34, rather than \$36. Perhaps Tent-only camping could be \$10, rather than \$15.

In short, Please use state reserve funds, not park user fees, for repairing storm damage, and reduce the proposed fee increases accordingly.

Thank you for considering the logic and fairness of this public input. And thank you for your service on this commission.

Sincerely,



Cathy Brechtelsbauer

September 18, 2019

SD Department of Game Fish & Parks
523 E. Capitol Avenue
Pierre, South Dakota 57501

RE: Increase to Park and Camping Fees

I received the notification that the SD Game Fish & Parks Commission is considering a "modest" increase in park fees for 2020.

I would not consider a 20% increase in Park Entrance License (from \$30 to \$36); a 24% increase for Prime camping fees (from \$21 to \$26 per day) and a 21% increase to preferred campgrounds (from \$19 to \$23 per night) a "modest" increase.

While I understand that many of the State Campgrounds suffered damages with our weather in 2019, does the State not contribute anything to repairing these? You state that you want to preserve the opportunity for the entry level camping family to get involved in the outdoors...a 20%+ increase in fees will not provide this opportunity.

South Dakota Treasury had excess funds from the 2018 budget....certainly some of those funds can be directed to fix the disasters that occurred in the State Parks. These increases are far above the rate of inflation, and I am sure that we are not the only family who will have to reduce our number of camping outings going forward if these new fees are adopted.

Sincerely,

A handwritten signature in black ink that reads "Debra Thompson". The signature is written in a cursive style with a large, looping initial "D".

Debra Thompson
47856 270th Street
Sioux Falls, SD 57108

Comes, Rachel

From: Comes, Rachel
Sent: Monday, September 30, 2019 4:51 PM
To: Comes, Rachel
Subject: FW: [EXT] GFP Commission Considers Increase to Park and Camping Fees

Categories: Commission

From: Miller, LouAnn
Sent: Thursday, September 19, 2019 8:04 AM
To: GFP Commission Public Comments
Subject: FW: [EXT] GFP Commission Considers Increase to Park and Camping Fees

From: Karen McDowell [mailto:krmcdowell@yahoo.com]
Sent: Wednesday, September 18, 2019 4:20 PM
To: SDGFPIINFO
Subject: Re: [EXT] GFP Commission Considers Increase to Park and Camping Fees

If you increase the entrance fee and camping fee, it would help seniors who are on a fixed income to give them a break on both. You already have reduced hunting and fishing for them.

Karen McDowell
Centerville, SD
[Sent from Yahoo Mail on Android](#)

On Wed, Sep 18, 2019 at 8:05 AM, South Dakota Game, Fish and Parks wrote:



GFP Commission Considers Increase to Park and Camping Fees

With the state park system facing \$8 million in flood damages, the South Dakota Game, Fish and Parks Commission is **considering increases** to state park entrance and camping fees.

Increasing the prices on camping spots is becoming cost prohibitive for a lot of families. Living by Yankton, my family goes camping at Lewis and Clark Recreation area quite often. As you know, it is very difficult to get a spot at this campground due to pressure from Nebraska and Iowa. On any given weekend, there are more Nebraska and Iowa campers than South Dakota. I've heard numerous Nebraska and Iowa people comment that they can't believe that they are charged the same amount per night as a South Dakota resident. I would propose that you raise all spots one or two dollars and increase the cost for non-residents to make up the difference. This would be similar policy to hunting and fishing licenses, which seems to work very well.

David Charles
Yankton, SD



Allen Dunbar <allendunbar77@gmail.com>

proposed change

Allen Dunbar <allendunbar77@gmail.com>
Draft

Wed, Sep 25, 2019 at 7:38 AM

I am writing in regards to the proposed change in administrative rule regarding the use of horses to train dogs for those people that qualify for such activity.

My name is Allen Dunbar, and I am from Oconto, Wisconsin. I have been coming to work and train dogs from horseback on the Ft. Pierre National Grassland in August for close to 20 years. I usually bring 2 horses, and a handful of dogs, all owned by me. I enjoy my time spent in the area.

Since that time, there have been several changes that have continually limited my ability to enjoy the use of Federal property, for which I am a taxpayer. Originally, there was a lottery system put in place, then a limitation of days, now this additional (change). Each time one of these changes has been made, it has further limited my ability to spend adequate blocks of time pursuing my passion.

While in South Dakota, I spend quite an amount of money on motel, fuel, food, sundries, etc.

I question how many people this will actually affect. How many horseback dog trainers are currently using the National Grasslands?? This last season (2019), I did not see one other trainer on the Grasslands.

For who's benefit is this rule change being made??

I would recommend that NO CHANGE be made to the current system. This allows me, as a taxpayer, to use and enjoy ground that I support financially.

Sincerely,

Allen Dunbar
Oconto, Wisconsin
allendunbar77@gmail.com

P.S. I tried sending this by email.
however the email address that
was listed was NOT valid -

Dear Commissioners,

I am strongly opposed to increasing the magnification of scopes on muzzleloaders.

When I advocated in support of a separate muzzleloading season in the late 1970s, the focus was giving traditional muzzleloader hunters a separate season independent of the regular rifle season. The idea was to encourage and promote traditional blackpowder hunting with caplock or flintlock rifles which used open sights and to allow hunters to pursue game without interference from long-range shooters and larger numbers of hunters in the regular rifle season. We did not ask for a season preceding rifle season, but a time where we were not competing with shooters using scoped rifles shooting deer out to 500 yards with modern ammunition. We were overjoyed when the first antlerless tags were made available to us for a short season following the regular rifle season.

However, the introduction of modern in-line rifles, blackpowder substitute propellants, shotgun primer ignition systems, and modern fast-twist barrels which shoot modern bullets has effectively made muzzleloading hunting an extension of the modern rifle season. The only thing that has leveled the playing field for traditionalists was restricting muzzleloaders to open sights during muzzleloader season.

Traditional muzzleloaders can be adversely affected by weather. Flintlock rifles cannot use modern blackpowder substitutes. Shooting a traditional patched round ball generally restricts us to shots of 100 yards or less. Modern in-lines, however, are not affected by weather and allowing scopes on these rifles will enable users to shoot to 300 yards or more. It effectively puts us traditional shooters back to the point we started before a muzzleloading season was adopted – competing with modern rifle shooters during the same season.

When the Commission approved any deer tags for muzzleloader season, we were finally able to hunt trophy deer and it was possible to draw every two years. With the proliferation of in-lines, the number of muzzleloading hunters increased. In 2017, there were over 7000 applicants for 1000 tags. Since I received my first any deer tag the first year they were offered, I have been fortunate to get one more with three years of preference. Allowing scoped muzzleloaders will likely increase the competition for limited tags because more hunters will participate if they can use a gun that is effectively a modern scoped single-shot rifle.

If you are going to allow scoped muzzleloaders for muzzleloading season, why not allow anyone to use crossbows during bow season? I see little difference. I urge the Commission to restrict muzzleloaders to open sights or zero power optics.

Respectfully,

Fred L. Wells III

13060 193rd Street

Vale, SD 57788

605-210-0819

wellsfl@sdplains.com

S.D. GF+P Commission Members,

I have read the magnification change to be used on muzzleloaders during the muzzleloading season. I have hunted w open sights and with a 1 power scope during this season. I appreciate being able to use the 1 power scope as it allows my aging eyes (65) to place the crosshair exactly where needed to make a clean ethical shot at short range. I would like to see the muzzleloading season kept short range as it was originally intended and to keep the Hunt in this season and not turn it into a long range event. I have a 6x scope on my .270 and can easily shoot to 300 yards. I know of people hunting on the reservations that use 4-16x scopes on their muzzleloaders (they carry 2) and shoot to 300 yds. and beyond.

My question to you is: What is the purpose of this season? and do you want to encourage longer range shooting, because this proposal will do that!

Paul Sand, Rosholt, SD

Thank you,
Paul Sand

South Dakota Game, Fish and Parks
523 E Capitol
Pierre SD 57501

Sir, madam, to whom it concerns:

I read your draft plan and find that unfortunately it is designed to manage mountain lions for maximum trophy hunting opportunity, not for conservation!

Mountain lions regulate their own numbers and do not require intense management to limit their populations. Hunting is a bad tool, killing the lions least likely to come into conflict with people, pets and livestock, and creating more space for young dispersing lions that are most likely to come into conflict.

Non-lethal methods are more effective and last longer.

Killing female mountain lions results in the orphaning of their kittens. Hunting leaves kittens to die from starvation, dehydration, and exposure.

Mountain lions are a keystone species in their ecosystems, maintaining biological diversity and other benefits to people.

I urge you to end the hunting of these precious mountain lions.

There's just too little habitat, too much human-caused mortality, and too few mountain lions to justify a hunt.

Remember, South Dakota's wildlife belongs to everyone, not to killers!

Sincerely:

Virgene Link-New
P.O. Box 249
Anacortes, Wa. 98221



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September 25, 2019

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

Tony Leif, Wildlife Division Director
South Dakota Game, Fish and Parks
523 East Capitol Ave
Pierre, SD 57501

RE: Proposed 2019/2020 and 2020/2021 Mountain Lion Hunting Seasons

Dear Chairman Jensen, Director Leif 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 2019/2020 and 2020/2021 Mountain Lion Hunting Seasons ("Proposal"). We oppose the Proposal because the staff's recommendations fail to conform with the best available science, and such excessive amounts of hunting will ultimately increase human and livestock conflicts—just like in Oregon and Coloradoⁱ—and harm mountain lion (*Puma concolor*) populations for the long term.

As detailed in the comments the Humane Society of the United States submitted on August 21st, 2019, regarding the draft South Dakota Mountain Lion Management Plan, we are opposed to the use of trophy hunting to manage mountain lions in South Dakota (Attachment A). We reiterate that this practice is not only cruel and unnecessary, but research has found that excessive trophy hunting leads to increased conflicts with humans, pets and livestock. Furthermore, trophy hunting and predator control of mountain lion is harmful to other wildlife including by diminishing our ability to restrict the spread of ungulate diseases, such as chronic wasting diseases.

Under South Dakota law, the Commission has a mandatory duty to conserve wildlife populations and avoid management decisions that threaten their viability. State statutes charge the Commission with the "conservation" and "protection...of wild animals and fish," as well as the "management of...wildlife to ensure their perpetuation of viable components of the ecosystem." SDCL § 41-2-18(1), (3). And because "[w]ild animals in [South Dakota] are the property of the state," the "citizens of this state have an interest in the management of wildlife so that it can be effectively conserved." *State v. Halverson*, 277 N.W.2d 723, 724 (S.D. 1979), citing SDCL § 41-11-1. The Legislature empowered the Commission with broad rulemaking authority in order to ensure that "expertise...in the field of wildlife conservation" guides wildlife management. *State v. Moschell*, 677 N.W.2d 551, 560 (S.D. 2004). The Commission is thus obligated to consider the best available science in order to protect the judicially recognized public interest in the conservation and protection of wildlife populations.

For the reasons that follow, we request that the Commission not approve the Proposal and protect mountain lions from unnecessary trophy hunting now and in perpetuity.



1) The Proposal would authorize trophy hunting levels that exceed what experts consider a sustainable offtake rate, threatening the stability and long-term survival of mountain lion populations in South Dakota as well as their range expansion to their historic range where they had been extirpated. GFP has recently released an adjusted mountain lion population estimate for the Black Hills of 260 mountain lions of all ages, or 203 adult and subadult mountain lions (those old enough to be trophy hunted). **The annual trophy hunting quota of 60 mountain lions amounts to 30% of this adult and subadult population.** Such high level of killing is unnecessary, cruel and not sustainable for the long-term stability of South Dakota's mountain lion population.

While we do not support a trophy hunt on mountain lions, GFP must ensure that any quotas not exceed 14% of the adult and subadult populations if the agency is determined to authorize a hunt. Multiple studies throughout the western U.S. have shown that this limit can prevent the killing of mountain lions above sustainable levels.ⁱⁱ Setting such a cap on trophy hunting quotas will help ensure the long-term sustainability of mountain lions in South Dakota. Therefore, the annual trophy hunting quota for mountain lions must not exceed 28 adult and subadult lions in order to stay under this 14% cap.

Additionally, we do not support the proposed changes to lengthen the season dates from December 26 – March 31 to December 26 – April 30 as well as the permitting of nonresident hunters to trophy hunt mountain lions. Such changes could lead to increased killing of mountain lions above sustainable levels.

2) The Proposal expands the use of hounds to pursue mountain lions in Custer State Park by increasing the number of access permits from 57 to 75. Additionally, outside the Black Hills Fire Protection District, the Proposal would expand the allowance for hound hunting that originates on private land to cross over or culminate on any public lands where unleashed dogs are permitted. Hound hunting is particularly cruel and harmful to both the mountain lion and the hounds, as well as to kittens and non-target wildlife.

As detailed in Attachment A, 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.ⁱⁱⁱ Hounds kill kittens, and mountain lions often injure or kill hounds.^{iv} The practice is exceedingly stressful and energetically taxing to mountain lions.^v Furthermore, hound hunting is not considered “fair chase” hunting by most.^{vi} Fair chase hunting is predicated upon giving the animal an equal opportunity to escape from the hunter.^{vii} 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,^{viii} and trespass onto private lands.^{ix}

If GFP authorizes a trophy hunt on mountain lions, the agency must prohibit the use of hounds. Therefore, we do not support the increased number of access permits into Custer State Park nor the proposal to expand the allowance for hound hunting outside the Black Hills Fire Protection District.

The Humane Society of the United States is strongly opposed to the Proposal as it only seeks to expand trophy hunting opportunities, not conserve mountain lions. South Dakota's mountain lions are an important component of our natural wild heritage and deserve reasoned management so that their populations are conserved for future generations.^x If trophy hunting of mountain lions is to continue in South Dakota, GFP must limit this practice so that it does not exceed sustainable levels. The proposed quota of 60 mountain lions, or 30% of the adult and subadult population, is not sound wildlife management. We call on the Commission to



reject the Proposal and, instead, call on GFP to conserve mountain lions for all South Dakotans, whose interest in wildlife conservation the Commission is bound by law to protect. Thank you for your consideration.

Sincerely,

Darci Adams
Humane State Program Director
The Humane Society of the United States
dadams@humanesociety.org

ⁱ E. Ross, "Oregon May Be Over-Hunting Cougars — Which Could Cause More Conflicts," Oregon Public Broadcasting (2018). Retrieved from <https://www.opb.org/news/article/cougar-overhunting-conflict-oregon/>; R. Moore, "Are state actions increasing the risk of cougars attacking people?" Boulder Weekly (2019). Retrieved from <https://www.boulderweekly.com/news/are-state-actions-increasing-the-risk-of-cougars-attacking-people/>.

ⁱⁱ B.T. Maletzke et al., "Effects of Hunting on Cougar Spatial Organization," *Ecology & Evolution* 4, no. 11 (2014); R. A. Beausoleil et al., "Research to Regulation: Cougar Social Behavior as a Guide for Management," *Wildlife Society Bulletin* 37, no. 3 (2013); H. S. Cooley et al., "Does Hunting Regulate Cougar Populations? A Test of the Compensatory Mortality Hypothesis," *Ecology* 90, no. 10 (2009); C. M. Lambert et al., "Cougar Population Dynamics and Viability in the Pacific Northwest," *J Wildl Manage.* 70 (2006); H. S. Robinson and R. Desimone, "The Garnet Range Mountain Lion Study: Characteristics of a Hunted Population in West-Central Montana: Final Report," *Montana Fish, Wildlife & Parks* (2011); H. S. Robinson et al., "A Test of the Compensatory Mortality Hypothesis in Mountain Lions: A Management Experiment in West-Central Montana," *Journal of Wildlife Management* 78, no. 5 (2014).

ⁱⁱⁱ T. L. Teel, R. S. Krannich, and R. H. Schmidt, "Utah Stakeholders' Attitudes toward Selected Cougar and Black Bear Management Practices," *Wildlife Society Bulletin* 30, no. 1 (2002).

^{iv} F. G. Lindzey et al., "Cougar Population Response to Manipulation in Southern Utah," *ibid.* 20, no. 2 (1992); Kenneth A. Logan and Linda L. Swenor, *Desert Puma: Evolutionary Ecology and Conservation of an Enduring Carnivore* (Washington, DC: Island Press, 2001); L. M. Elbroch et al., "Trailing Hounds Vs Foot Snares: Comparing Injuries to Pumas Puma Concolor Captured in Chilean Patagonia," *Wildlife Biology* 19, no. 2 (2013).

^v H. J. Harlow et al., "Stress Response of Cougars to Nonlethal Pursuit by Hunters," *Canadian Journal of Zoology* 70, no. 1 (1992); C. M. Bryce, C. C. Wilmers, and T. M. Williams, "Energetics and Evasion Dynamics of Large Predators and Prey: Pumas Vs. Hounds," *PeerJ* e3701 (2017); F. Bonier, H. Quigley, and S. N. Austad, "A Technique for Non-Invasively Detecting Stress Response in Cougars," *Wildlife Society Bulletin* 32, no. 3 (2004).

^{vi} J. Posewitz, *Beyond Fair Chase: The Ethic and Tradition of Hunting* (Helena, Montana: Falcon Press, 1994); Teel, Krannich, and Schmidt, "Utah Stakeholders' Attitudes toward Selected Cougar and Black Bear Management Practices.," *Cougar Management Guidelines, Cougar Management Guidelines* (Bainbridge Island, WA: WildFutures, 2005).

^{vii} Posewitz, *Beyond Fair Chase: The Ethic and Tradition of Hunting*.

^{viii} S. Grignolio et al., "Effects of Hunting with Hounds on a Non-Target Species Living on the Edge of a Protected Area," *Biological Conservation* 144, no. 1 (2011); E. Mori, "Porcupines in the Landscape of Fear: Effect of Hunting with Dogs on the Behaviour of a Non-Target Species," *Mammal Research* 62, no. 3 (2017).

^{ix} Hank Hristienko and Jr. McDonald, John E., "Going into the 21st Century: A Perspective on Trends and Controversies in the Management of the Black Bear " *Ursus* 18, no. 1 (2007).

^x Cynthia Jacobson et al., "A Conservation Institution for the 21st Century: Implications for State Wildlife Agencies," *Journal of Wildlife Management* 74, no. 2 (2010); Michael P. Nelson et al., "An Inadequate Construct? North American Model: What's Missing, What's Needed," *The Wildlife Professional*, no. Summer 2011 (2011).



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Attachment A

August 21, 2019

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

Tony Leif, Wildlife Division Director
South Dakota Game, Fish and Parks
523 East Capitol Ave
Pierre, SD 57501

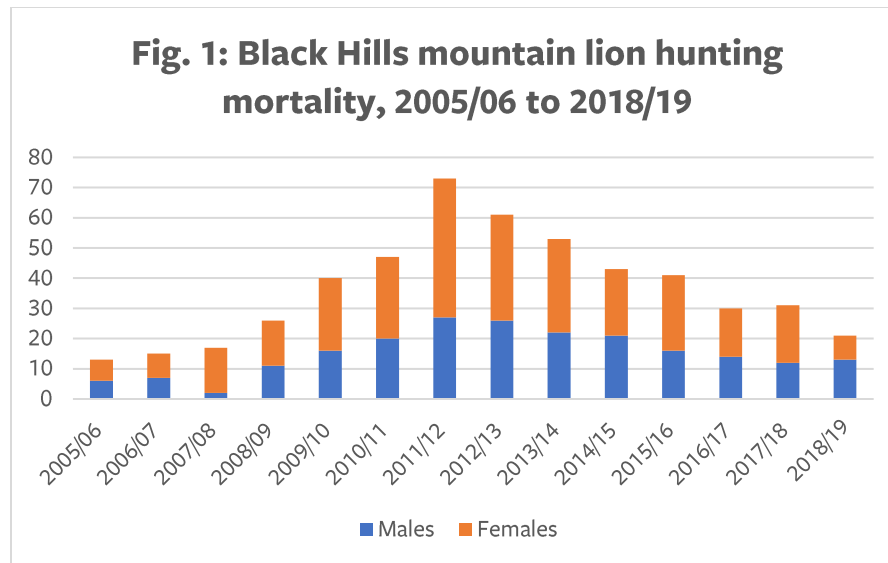
Email: LionPlan@state.sd.us

RE: Draft South Dakota Mountain Lion Management Plan, 2019-2029

Dear Chairman Jensen, Director Leif 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 the draft South Dakota Mountain Lion Management Plan, 2019-2029 (“Plan”). We support South Dakota Game, Fish and Parks’ (“GFP”) efforts to update the agency’s mountain lion (*Puma concolor*) management objectives using the best available science to provide universal guidance to wildlife managers. However, we strongly recommend the Plan not include trophy-huntingⁱ as a primary management technique. The practice is unnecessary for sound management and harmful to mountain lions, livestock and people as we explain herein.

Since peaking in the 2011/12 hunting season, mountain lion mortality from trophy hunting in the Black Hills has steadily declined (Fig. 1).ⁱⁱ During the 2018/19 season, trophy hunters killed 21 mountain lions. This is despite a robust number of license sales and the use of hounds to hunt mountain lions in Custer State Park, as well as GFP’s purported dramatic increase in South Dakota’s mountain lion population. GFP claims that the Black Hills population now numbers 532 total mountain lions, or 413 adults/subadults. This amounts to an increase of more than 200 cats compared to the agency’s 2016/17 population estimate of 300 total mountain lions, or 230 adults/subadults.ⁱⁱⁱ This increase in population is biologically impossible and must be re-evaluated for accuracy. Furthermore, the confidence intervals on the current mountain lion population estimate are extremely broad, such that the population could number anywhere between 111 to 970 mountain lions according to GFP’s data.^{iv} If the lower end of this estimate is representative of the actual population, the current quota of 60 total mountain lions in the Black Hills would allow the killing of more than 54 percent of the population. Given the planetary extinction threat facing Earth, wildlife managers must ensure they are using the best available science and the precautionary principle to conserve and protect wild, native large-bodied mammals.



While anecdotal evidence and trophy hunting mortality counts are not clear indicators of population size, the decreasing trend in trophy hunting mortality despite robust hunter numbers may be representative of a declining mountain lion population (Fig. 1). Additionally, the number of mountain lion observations has steadily decreased according to the Plan. As such, we urge GFP to halt any trophy hunting of mountain lions in the state until a reliable population estimate can be established and externally peer reviewed, and the agency can obtain a clearer understanding of the effects trophy hunting may be having on the species in South Dakota and beyond.

If GFP is to continue allowing trophy hunting of mountain lions, their management must be conducted in a moderate manner to be sustainable and avoid social disruption to lion communities, preventing human and livestock conflicts. Above all, we urge the agency to make the following changes within the management plan:

- **Set sustainable quotas based on reliable research and population estimates in order to prevent over-persecution.** We recommend GFP establish within the Plan a cap on trophy hunting quotas of no more than 14 percent based on adult and subadult mountain lion population estimates for the Black Hills. Multiple studies throughout the western U.S. have shown that this limit can prevent the killing of mountain lions above intrinsic growth rates.^v Setting such a cap on trophy hunting quotas across the state will help ensure the long-term sustainability of mountain lions in South Dakota.
- **Restrict trophy hunting of mountain lions outside of the Black Hills to protect mountain lion kittens and allow dispersing cats the opportunity to establish themselves in territories throughout South Dakota and beyond.** The Plan acknowledges that suitable habitat exists for mountain lions in South Dakota's prairies. Yet, hunting of mountain lions outside of the Black Hills is unlimited both in quota and season length. GFP must rely on the sound science to regulate mountain lion hunting throughout the state, including in the prairies, to allow them to recover in their historic range in Midwestern and Eastern states where they have been extirpated.



- **Prioritize the use of non-lethal methods when responding to conflicts with mountain lions.** As we detail below, research shows that trophy hunting of mountain lions exacerbates conflicts with humans, pets and livestock. Furthermore, lethal predator control can further disrupt the delicate social structures of mountain lions. In cases where non-lethal predator control can be utilized, such as hazing, relocation, and letting animals leave on their own, GFP should prioritize these methods above lethal options.

For the reasons that follow, we urge GFP to incorporate these recommendations into the Plan:

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.^{vi} 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” which is “profoundly disrupted” by trophy hunting.^{vii} 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.^{viii} Human persecution affects their social structure,^{ix} and harms their persistence.^x

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.^{xi} 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.^{xii} 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.^{xiii}

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.”^{xiv} Instead, South Dakota’s mountain lions experience *additive* levels of mortality.^{xv} Extensive research shows that this additive mortality caused by high levels of hunting results in population sinks.^{xvi} 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.^{xvii}

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.^{xviii} Over-hunting harms a population’s ability to recruit new members if too many adult females are removed.^{xix} A Utah study shows that trophy hunting adult females orphans their kittens, leaving them to die by dehydration, malnutrition, and/or exposure.^{xx} Kittens are reliant upon their mothers beyond 12 months of age.^{xxi}



3.) *Trophy hunting harms entire mountain lion communities:* A recent study on mountain lions shows that mountain lions are quite social animals 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.^{xxii} Disrupting these communities leads to deadly intraspecific strife, including infanticide and social chaos within the family groups.^{xxiii} Trophy hunting destabilizes mountain lion populations, which may cause increased conflicts with humans, pets and livestock.^{xxiv}

4.) *Trophy hunting is unnecessary, as mountain lions are a self-regulating species:* 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.^{xxv} Their populations must stay at a much smaller size relative to their prey’s biomass or risk starvation.^{xxvi} They do this by regulating their own numbers.^{xxvii} When prey populations decline, so do mountain lion populations.^{xxviii} Mountain lion populations also require expansive habitat, with individual cats maintaining large home ranges that overlap with one another.^{xxix}

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.^{xxx} As such, conserving these large cats on the landscape creates a socio-ecological benefit that far offsets any societal costs.^{xxxi} 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.^{xxxii} Additionally, carrion left from mountain lion kills feeds scavengers, beetles, foxes, bears and other wildlife species, further enhancing biodiversity.^{xxxiii}

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.^{xxxiv} Hounds kill kittens, and mountain lions often injure or kill hounds.^{xxxv} The practice is exceedingly stressful and energetically taxing to mountain lions.^{xxxvi}

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).^{xxxvii} For every one minute the hounds chased a mountain lion, it cost the cat approximately five times what it would have expended if the cat had been hunting. A 3.5-minute chase, according to Bryce et al. (2017), likely equaled 18 minutes of energy the mountain lion would have expended on hunting activities necessary to find prey.^{xxxviii}

Hounding is not considered “fair chase” hunting by most.^{xxxix} Fair chase hunting is predicated upon giving the animal an equal opportunity to escape from the hunter.^{xl} 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,^{xli} and trespass onto private lands.^{xlii}



II. Trophy hunting mountain lions does not boost prey populations but it could exacerbate ungulate diseases

Research shows that ungulates are ultimately limited more by their food resources and other habitat factors (“bottom-up” limitations), rather than by their predators (“top down” regulators).^{xliii} However, when herds lose their predators, they suffer poorer health and body condition, as well as more degraded habitats.^{xliiv} 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.^{xliv}

Mountain lions reduce deadly deer-vehicle collisions^{xlvi} and 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).^{xlvii} This ecosystem benefit is increasingly important as CWD infection continues to infiltrate ungulate herds in South Dakota and neighboring states.^{xlviii}

Hunters likely cannot substitute for mountain lions as providers of ecological services such as stopping the spread of disease.^{xlix} During a three-year study on Colorado’s Front Range, researchers found that mountain lions preyed on mule deer infected with CWD.¹ The study concluded that adult mule 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.”ⁱⁱ This suggests that mountain lions select for infected prey and may be more effective at culling animals with CWD than hunters who rely on more obvious signs of emaciation that occur in later stages of the disease. Moreover, the lions consumed over 85 percent of carcasses, including brains, removing a significant amount of contamination from the environment.^{lii}

The best available science demonstrates that killing native carnivores to increase ungulate populations is unlikely to produce positive results. Numerous recent studies demonstrate that predator removal actions “generally had no effect” in the long term on ungulate populations.^{liii} 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.^{liiv} 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.^{liv}

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,^{lvi} resource competition by livestock, and loss of habitat.^{lvii} Sawyer and Lindzey (2002) surveyed over 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.^{lviii} 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.^{lix} Similar behavior has been documented on endangered mountain caribou in the southern Selkirk Mountains – as trophy hunting disrupted sensitive mountain lion communities, female lions took to higher altitudes to avoid incoming, infanticidal young males, and preyed upon mountain caribou.^{lx}



South Dakota can better plan for bighorn sheep management by selecting relocation sites for bighorn sheep that have little stalking cover.^{lxi} Escape terrain that contains cliffs, rocks, and foliage makes excellent ambush cover for a mountain lion and should be avoided.^{lxii} Also, the amount of mountain lion predation is generally greater on small-sized bighorn sheep populations (those that are under 100 individuals) than on other larger bighorn sheep populations.^{lxiii} 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.^{lxiv}

III. Trophy hunting increases human-mountain lion conflict and livestock depredation

In March 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.^{lxv} 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.^{lxvi} 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.^{lxvii} According to 2014 data, zero sheep were lost to mountain lions in South Dakota.^{lxviii}

Human-mountain lion conflict is higher in areas with mountain lion trophy hunting.^{lxix} Trophy hunting and predator control of mountain lions results in increased conflicts because lions' social structures are destabilized.^{lxx}

A recent 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.^{lxxi} Instead, the authors concluded, non-lethal alternatives to predator removal, coupled with coexistence (husbandry techniques) may resolve conflicts.^{lxxii}

A Washington state study shows that as mountain lion complaints increased, wildlife officials lengthened seasons and increased bag limits to respond to what they believed was a rapidly growing mountain lion population. However, the public's perception of an increasing population and greater numbers of livestock depredations was actually a result of a declining female and increasing male population.^{lxxiii} Heavy hunting of mountain lions skewed the ratio of young males in the population by causing compensatory immigration and emigration by young male mountain lions, even though it resulted in no net change in the population.^{lxxiv}

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.^{lxxv} Peebles et al. (2013) write:

... each additional cougar 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%.^{lxxvi}



Hunting disrupts mountain lions' sex-age structure and tilts a population to one that is comprised of younger males, who are more likely to engage in livestock deprecations than animals in stable, older population.^{lxxxvii}

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.^{lxxxviii} 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.^{lxxxix}

Furthermore, GFP must work with livestock owners to ensure they are adequately and appropriately employing nonlethal predator 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.^{lxxx}
- 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.^{lxxx} The type of enclosure needs to be specific for the predator to prevent climbing, digging or jumping.^{lxxxii}
- Move calves from pastures with chronic predation problems and replace them with older, less vulnerable animals.^{lxxxiii}
- Concentrate calving season (i.e., via artificial insemination) to synchronize births with wild ungulate birth periods.^{lxxxiv}
- In large landscapes, use human herders, range riders and/or guard animals.^{lxxxv} 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.^{lxxxvi}
- Suspended clothing; LED flashing lights (sold as “Foxlights”); radio alarm boxes set off to make alarm sounds/noises near pastures are some of the low-cost sound and or visual equipment that deters wild cats.^{lxxxvii}

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.^{lxxxviii} 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.



IV. 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 these 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.^{lxxxix} 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.^{xc} Altogether, hunters spent \$25.6 billion in 2016, about one-third that spent by wildlife watchers (Fig. 2).^{xcii}

Figure 2: Wildlife recreation participation & expenditures, 2011 vs. 2016 data			
Numbers	2011	2016	Change
Wildlife watchers	71.8M	86.0M	+14.2M (+20%)
All hunters	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%)
Expenditures	2011	2016	Change
Wildlife watchers	\$59.1B	\$75.9B	+\$16.8B (+28%)
All hunters	\$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.^{xcii} A new study indicates that Americans highly value wildlife, including top carnivores such as mountain lions, and are concerned about their welfare and conservation.^{xciii} Surveys also show that the majority of Americans do not support trophy hunting.^{xciv} An additional study showed that most believe mountain lions are the best representative of the Southern Rockies heritage and landscape.^{xcv} Authorizing a trophy hunting season is not in the best interest of South Dakotans who prefer that these large cats remain on the landscape, without threat of persecution.

V. Conclusion

As detailed above, trophy hunting of mountain lions, especially at unsustainable and excessive rates, can harm the long-term survival of the species and increase conflicts with humans, pets and livestock. Moreover, high rates of killing can be damaging to ecosystems and to other wildlife, including South Dakota’s ungulate populations which benefit from mountain lion predation on individuals infected with chronic wasting disease.

For reasons stated above, the Humane Society of the United States recommends the Plan not include trophy hunting of mountain lions as a management strategy. South Dakota’s mountain lions are an important component of our natural wild heritage and deserve reasoned management so that their populations are



conserved for future generations.^{xvii} If trophy hunting of mountain lions is to continue in South Dakota, GFP must include within the Plan a cap on trophy hunting quotas to not exceed 12 percent of the adult mountain lion population. Furthermore, GFP must restrict trophy hunting of mountain lions in the remainder of the state in order to protect both dispersing and breeding mountain lions and their kittens. Lastly, we call on GFP to prioritize the use of non-lethal methods to address conflicts with mountain lions as lethal removal can harm not only individual mountain lions but entire populations and because lethal methods are not supported by the majority of South Dakotans. Thank you for your consideration.

Sincerely,

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ⁱThe Humane Society of the United States defines trophy hunting as the practice of killing—or pursuing with the intent to kill—wild animals to display their body parts, not primarily for food or subsistence (The Humane Society of the United States 2017).

ⁱⁱ South Dakota Game Fish and Parks, "South Dakota Mountain Lion Management Plan, 2019-2029, Draft," (Pierre, South Dakota 2019).

ⁱⁱⁱ Ibid.

^{iv} Ibid.

^v B.T. Maletzke et al., "Effects of Hunting on Cougar Spatial Organization," *Ecology & Evolution* 4, no. 11 (2014); R. A. Beausoleil et al., "Research to Regulation: Cougar Social Behavior as a Guide for Management," *Wildlife Society Bulletin* 37, no. 3 (2013); H. S. Cooley et al., "Does Hunting Regulate Cougar Populations? A Test of the Compensatory Mortality Hypothesis," *Ecology* 90, no. 10 (2009); C. M. Lambert et al., "Cougar Population Dynamics and Viability in the Pacific Northwest," *J Wildl Manage.* 70 (2006); H. S. Robinson and R. Desimone, "The Garnet Range Mountain Lion Study: Characteristics of a Hunted Population in West-Central Montana: Final Report," *Montana Fish, Wildlife & Parks* (2011); H. S. Robinson et al., "A Test of the Compensatory Mortality Hypothesis in Mountain Lions: A Management Experiment in West-Central Montana," *Journal of Wildlife Management* 78, no. 5 (2014).

^{vi} See e.g., The Humane Society of the United States, "State of the Mountain Lion: A Call to End Trophy Hunting of America's Lion," (Washington, DC 2017); Cougar Management Guidelines, *Cougar Management Guidelines* (Bainbridge Island, WA: WildFutures, 2005).

^{vii} Batavia et al. (2018) write: "...nonhuman animals are not only physically, socially, and emotionally disrupted [by trophy hunters], but also debased by the act of trophy hunting. Commoditized, killed, and dismembered, these individuals are relegated to the sphere of mere things when they are turned into souvenirs, oddities, and collectibles. We argue this is morally indefensible. Nonhuman animals are not mere objects but living beings with interests of their own, to whom we owe at least some basic modicum of respect (Regan, 1983). To transform them into trophies of human conquest is a violation of duty and common decency; and to accept, affirm, and even institutionalize trophy hunting, as the international conservation community seems to have done, is to aid and abet an immoral practice." Authors then argue that trophy hunting cannot be "presumed [to be] integral to conservation success."

^{viii} e.g., A. D. Wallach et al., "What Is an Apex Predator?," *Oikos* 124, no. 11 (2015); R. B. Wielgus et al., "Effects of Male Trophy Hunting on Female Carnivore Population Growth and Persistence," *Biological Conservation* 167 (2013); D. Stoner, M. L. Wolfe, and D. Choate, "Cougar Exploitation Levels in Utah: Implications for Demographic Structure, Population Recovery, and Metapopulation Dynamics," *Journal of Wildlife Management* 70 (2006); S. Creel et al., "Questionable Policy for Large Carnivore Hunting," *Science* 350, no. 6267 (2015); J. L. Weaver, P. C. Paquet, and L. F. Ruggiero, "Resilience and Conservation of Large Carnivores in the Rocky Mountains," *Conservation Biology* 10, no. 4 (1996).

^{ix} Stoner, Wolfe, and Choate, "Cougar Exploitation Levels in Utah: Implications for Demographic Structure, Population Recovery, and Metapopulation Dynamics."; Kaylie A. Peebles et al., "Effects of Remedial Sport Hunting on Cougar Complaints and Livestock Depredations," *Plos One* 8, no. 11 (2013); Wallach et al., "What Is an Apex Predator?."; C. T. Darimont et al., "Human Predators Outpace Other Agents of Trait Change in the Wild," *Proceedings of the National Academy of Sciences of the United States of America* 106, no. 3 (2009); Sterling D. Miller et al., "Trends in Intensive Management of Alaska's Grizzly Bears, 1980-2010," *Journal of Wildlife Management* 75, no. 6 (2011); L. Mark Elbroch et al., "Adaptive Social Strategies in a Solitary Carnivore," *Science Advances* 3, no. 10 (2017).



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- ^x Chris T. Darimont et al., "The Unique Ecology of Human Predators," *Science* 349, no. 6250 (2015).
- ^{xi} J. A. Vucetich, D. W. Smith, and D. R. Stahler, "Influence of Harvest, Climate and Wolf Predation on Yellowstone Elk, 1961-2004," *Oikos* 111, no. 2 (2005); G. J. Wright et al., "Selection of Northern Yellowstone Elk by Gray Wolves and Hunters," *Journal of Wildlife Management* 70, no. 4 (2006); L. L. Eberhardt et al., "A Seventy-Year History of Trends in Yellowstone's Northern Elk Herd," *ibid.* 71, no. 2 (2007); Darimont et al., "The Unique Ecology of Human Predators."
- ^{xii} Scott Creel and Jay Rotella, "Meta-Analysis of Relationships between Human Offtake, Total Mortality and Population Dynamics of Gray Wolves (*Canis Lupus*)," *PLoS ONE* 5, no. 9 (2010); D. E. Ausband et al., "Recruitment in a Social Carnivore before and after Harvest," *Animal Conservation* 18, no. 5 (2015); Darimont et al., "The Unique Ecology of Human Predators."
- ^{xiii} Robinson and Desimone, "The Garnet Range Mountain Lion Study: Characteristics of a Hunted Population in West-Central Montana: Final Report."; Robinson et al., "A Test of the Compensatory Mortality Hypothesis in Mountain Lions: A Management Experiment in West-Central Montana."; Cooley et al., "Does Hunting Regulate Cougar Populations? A Test of the Compensatory Mortality Hypothesis."; Wielgus et al., "Effects of Male Trophy Hunting on Female Carnivore Population Growth and Persistence."; C. M. S. Lambert et al., "Cougar Population Dynamics and Viability in the Pacific Northwest," *Journal of Wildlife Management* 70 (2006); Kristine J. Teichman, Bogdan Cristescu, and Chris T. Darimont, "Hunting as a Management Tool? Cougar-Human Conflict Is Positively Related to Trophy Hunting," *BMC Ecology* 16, no. 1 (2016).
- ^{xiv} M. L. Wolfe et al., "Is Anthropogenic Cougar Mortality Compensated by Changes in Natural Mortality in Utah? Insight from Long-Term Studies," *Biological Conservation* 182 (2015), p. 195
- ^{xv} *Ibid.*; Robinson and Desimone, "The Garnet Range Mountain Lion Study: Characteristics of a Hunted Population in West-Central Montana: Final Report."; Robinson et al., "A Test of the Compensatory Mortality Hypothesis in Mountain Lions: A Management Experiment in West-Central Montana."; H. S. Robinson et al., "Sink Populations in Carnivore Management: Cougar Demography and Immigration in a Hunted Population," *Ecological Applications* 18, no. 4 (2008).
- ^{xvi} Wolfe et al., "Is Anthropogenic Cougar Mortality Compensated by Changes in Natural Mortality in Utah? Insight from Long-Term Studies."; Robinson et al., "Sink Populations in Carnivore Management: Cougar Demography and Immigration in a Hunted Population."; H. S. Cooley et al., "Source Populations in Carnivore Management: Cougar Demography and Emigration in a Lightly Hunted Population," *Animal Conservation* 12, no. 4 (2009); Cooley et al., "Does Hunting Regulate Cougar Populations? A Test of the Compensatory Mortality Hypothesis."
- ^{xvii} Cooley et al., "Source Populations in Carnivore Management: Cougar Demography and Emigration in a Lightly Hunted Population."; Robinson et al., "Sink Populations in Carnivore Management: Cougar Demography and Immigration in a Hunted Population."
- ^{xviii} D. C. Stoner et al., "Dispersal Behaviour of a Polygynous Carnivore: Do Cougars Puma Concolor Follow Source-Sink Predictions?," *Wildlife Biology* 19, no. 3 (2013); Wielgus et al., "Effects of Male Trophy Hunting on Female Carnivore Population Growth and Persistence."; Stoner et al., "Dispersal Behaviour of a Polygynous Carnivore: Do Cougars Puma Concolor Follow Source-Sink Predictions?."
- ^{xix} C. R. Anderson and F. G. Lindzey, "Experimental Evaluation of Population Trend and Harvest Composition in a Wyoming Cougar Population," *Wildlife Society Bulletin* 33, no. 1 (2005).
- ^{xx} Stoner, Wolfe, and Choate, "Cougar Exploitation Levels in Utah: Implications for Demographic Structure, Population Recovery, and Metapopulation Dynamics."
- ^{xxi} L. M. Elbroch and H. Quigley, "Observations of Wild Cougar (Puma Concolor) Kittens with Live Prey: Implications for Learning and Survival," *Canadian Field-Naturalist* 126, no. 4 (2012); Elbroch et al., "Adaptive Social Strategies in a Solitary Carnivore."; L. Mark Elbroch, Jennifer Feltner, and H. B. Quigley, "Stage-Dependent Puma Predation on Dangerous Prey," *Journal of Zoology* 302 (2017).
- ^{xxii} Elbroch et al., "Adaptive Social Strategies in a Solitary Carnivore."
- ^{xxiii} Robinson and Desimone, "The Garnet Range Mountain Lion Study: Characteristics of a Hunted Population in West-Central Montana: Final Report."; Robinson et al., "A Test of the Compensatory Mortality Hypothesis in Mountain Lions: A Management Experiment in West-Central Montana."; Cooley et al., "Does Hunting Regulate Cougar Populations? A Test of the Compensatory Mortality Hypothesis."; Wielgus et al., "Effects of Male Trophy Hunting on Female Carnivore Population Growth and Persistence."; Lambert et al., "Cougar Population Dynamics and Viability in the Pacific Northwest."; Creel et al., "Questionable Policy for Large Carnivore Hunting."; Ausband et al., "Recruitment in a Social Carnivore before and after Harvest."; Darimont et al., "The Unique Ecology of Human Predators."
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**THE HUMANE SOCIETY
OF THE UNITED STATES**

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Comments on the draft South Dakota Mountain Lion Management Plan, 2019-2029

September 29, 2019

Helen McGinnis

PO Box 300

Harman, WV 26270

304-227-4166

Principal Admin of [Klandagi: Puma Rewilding Facebook](#)

Thank you for the opportunity to comment on the proposed South Dakota management plan for the next ten years. I am dismayed that your goals are to continue to reduce the Black Hills population by extending the season, allowing more lion hunting in Custer State Park, allowing nonresidents to hunt, and expanding opportunities for hound hunting outside the Black Hills.

You continue to regard mountain lions essentially as vermin rather than as valued native species which play an important role in ecosystem management. This is puzzling. It's my understanding that your comprehensive studies of elk, deer and bighorn sheep have determined lions are responsible for little if any reduction in the populations of these ungulates. There have been no documented attacks on humans. There have been very few instances of depredation on livestock, and relatively few on pets. (Pet depredation is controlling by removing the "offending" lions.)

The draft mountain lion management plan issued this past July recognizes that suitable habitat for small populations exist outside the Black Hills Fire Protection District. You claim year round hound hunting outside the Hills increases the opportunities for lion hunting. That's ridiculous. Without setting aside areas of suitable habitat on public lands outside the Hills where lions are protected and allowed to breeding, lion hunting opportunities will not expand.

Lions in what I call the "Ring of Death" just outside the Black Hills Fire Protection, east and south of the highways that ring the hills, should be managed in the same manner as lions within the ring. It's obvious now lions attempting to disperse from the Hills onto the "Prairie" are mostly killed in the Ring.

Consider opening the Black Hills to hound hunting. The idea of hounding is reprehensible to most people, but whether a lion is harvested by boot hunters or houndsmen, the outcome is the same—it is dead. Houndsmen have the opportunity to observe the lion they are about to kill and can choose not to kill females that are

lactating. More important, many houndsmen are dedicated to their sport. The chase is over once a lion is treed. Some opt not to kill the lion. Hound hunters are the most effective advocates of lions in Montana because they want more lions to hunt. Some make money as outfitters for out of state residents.

Hunting is not ethical in state parks. I will advise my friends to boycott Custer State Park. Using the park as the only areas in the Black Hills where hound hunting is allowed is unfortunate. One fact of interest—in 2009 and maybe in later years, elk have been herded from Wind Cave National Park (the only area in the Black Hills where lion hunting prohibited) into Custer State Park, presumably to increase hunting opportunities in the state park. So apparently the lions in Wind Cave NP have not noticeably affected elk numbers.

I am interested in restoring cougars to eastern North America. I do not agree with recent articles essentially claiming recolonization will take place no matter how lions in source populations—of which South Dakota has been the most important—are managed. I hope to submit a journal article on the subject.



September 28, 2019

TO: South Dakota Game Fish & Parks Commission

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

RE: Updated Mountain Lion Management Plan

Dear Chairman Jensen, Members of the Commission, and Director Leif,

South Dakotans Fighting Animal Cruelty Together (SD FACT) writes strongly in opposition of the proposed updated mountain lion management plan. With support from over 4,000 members, we provide the following:

Without scientific knowledge of the number of mountain lions in South Dakota, a quota of 60 hunting permits could have devastating effects on the population and potentially extirpate mountain lions in our state.

Quota numbers should include those lions that are killed by vehicles, incidental snaring or trapping, poisoning, poaching, and public safety removal. Without more scientific information as to factual lion population numbers and, in light of the fact that the longstanding quota has not been met in several years, it is completely unnecessary to increase the amount of lions killed annually. We feel this increase is unjustified and dangerous for this essential predator.

Using hounds to hunt mountain lions is unethical and is not sporting. Often dogs die of exhaustion or are mauled. Hound hunting is unethical, inhumane and dangerous for the dog. GPS collars for hunting should also be prohibited as it does not provide fair chase.

Extending the mountain lion season could impact the end of mating season and occur when lions are pregnant, giving birth and/or rearing their young. This could result in orphaned kittens who will eventually die from starvation, dehydration and exposure. *SDCL 41-1-4 No person may wantonly waste or destroy any of the birds, animals, or*

fish of the kinds protected by the laws of this state. Unborn kittens or those dependent on their lactating mother are wanton waste of our state wildlife.

Trophy hunting of mountain lions kills the lead member of the territory, resulting in inexperienced juveniles most likely to cause conflicts with livestock and humans. There's just too little habitat, too much human-caused mortality, and too few mountain lions to justify a hunt. Remember, South Dakota's wildlife belongs to everyone, not only to hunters.

The difficulty of hunting a mountain lion may be an indicator of lesser population numbers. At the very least, the fact that killing a mountain lion is such a difficult enterprise, should go to the credit of this noble, unique apex predator and should not lead to multiple rules allowing for an easier "harvest" by inexperienced, unsuccessful outdoorsmen. There remains insufficient evidentiary facts for the increase in the historically unmet quotas and in the universal use of hounds, GPS collars and a lengthened season.

SDCL 41-1-2. Game birds, animals, and fish as property of state. All wildlife is held as a public trust by the state, similar to any other natural resource. Introducing 250 out-of-state hunting licenses, solely as a cash-grab, unfairly restricts the local enjoyment of this resource for South Dakota hunters and non-hunters alike. While value of mountain lions cannot solely be defined by monetary considerations, it is vital that your oversight not lead to the complete elimination of this unique public resource.

Respectfully submitted,

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

sdfact.org

Nancy Hilding
President
Prairie Hills Audubon Society
P.O. Box 788
Black Hawk, SD 57718
September 29th, 2019

SD Game, Fish and Parks Commission
Joe Foss Building
East Capitol Avenue
Pierre, SD 57501

Dear SD Game, Fish and Parks Commission,

Prairie Hills Audubon Society has sent you our comments on the Draft Mountain Lion Plan Revision.

Today we write to object to all the proposed changes to the 2019-2021 Mountain Lion Hunting Season.

Staff set an objective of 200-300 lions in the Draft Plan Revision. The staff's population estimate for Jan of 2019 was 203 adults and sub/adults and with kittens added to the mix -- the population is 260 lions of all ages. This is comfortably within your population goals.

All the proposed changes to the season will result in more lions killed.

GFP recommended changes from last year:

1. Change the season dates from December 26 - March 31 to December 26 -April 30.
2. Increase the number of access permits in Custer State Park from 57 to 65.*
3. Allow nonresident hunting opportunity and provide 250 nonresident lottery licenses.
4. Establish a nonresident license fee of \$280.
5. Outside the Black Hills Fire Protection District, expand the allowance for the use of dogs that originates on private land to cross over or culminate on any public lands where unleashed dogs are permitted. The current restriction for the Fort Meade Recreation Area would remain.
6. Authorize the commission to extend the hunting season beyond April 30.

Since the 2012-13 season, the "harvest limit" in the Black Hills Unit, was greater than the actual harvest, thus the things limiting the harvest in the Black Hills, is actually the number of days available for hunting, hunting methods allowed and the number of hunters. Increasing these will increase the harvest. The Prairie Unit has an unlimited harvest for 365 days a year. The expansion of the area where hound hunting can occur will also increase the harvest in the Prairie Unit.

We believe that your harvests have been too high, as we explained

in our comment letter on the draft Mountain Lion Management Plan Revision. We thus object to these changes. They seem like a wish list for all the pro-hunting groups at the stakeholder meeting. Are you giving every pro-lion hunting group that attended, a small prize? What about the groups concerned about concerns of conservation of lions and their expansion and recovery of former ranges?

We are especially concerned for Custer State Park (CSP), where you allow for 8 new lions to be killed. As you have not specified a lottery application and new CSP sub-season intervals, we are not sure under what procedure those 8 "soon to be dead" lions will be inventoried and/or hunted -- and we must assume they are just hunted with a general license.

We ask you to look into the potential impacts to pregnant ungulates and/or newborn ungulates of a spring lion-hunting season in April. Please discuss when bison, bighorn sheep, mountain goats, elk and deer all deliver their children and how activity associated with lion hunting (especially with hounds on CSP) might provide for too much disturbance during periods critical to ungulate breeding success.

We ask you to evaluate if spring hunting will increase killing of nursing mothers with dependent young.

Denise Petersen (staff of Mountain Lion Foundation) has mapped data from the SD GFP cougar Mortality data spreadsheets. MAP LINK - 23 YEARS OF SD COUGAR MORTALITY DATA, Please view this interactive map - layers are available for type of death, sex, by year of death. Click on the dot to learn about dead lion, it's age, sex and cause of death. Thanks to Denise Petersen of MLF for creating this interactive map & thanks to SDGFP for sharing their records. <http://mountainlionfdn.maps.arcgis.com/apps/webappviewer/index.html?id=d0181adaffd74bf287acf4b6a6a38d8b>

Sincerely,

Nancy Hilding

A handwritten signature in black ink that reads "Nancy Hilding". The signature is written in a cursive, flowing style.

President
Prairie Hills Audubon Society

08/31/19

Dear people

Having read the proposals
up and coming I think some
folks are miss lead! as
a Audubon Society? Don't
they deal with birds? we trapper
take care of the predator that prey
on birds? as for changing check
times that is bad Idea.

Sounds like trapper harass ment
from the get go. to me some
one's have a alternative
project. Some thing like
put out by "peta"

Don't want or Need these
people in South Dakota!
I Vote NO!

Charlie Bode

910 Fifth St

Scotland SD

57059

605 589 4812

Leave message

Nancy Hilding
President
Prairie Hills Audubon Society
P.O. Box 788
Black Hawk, SD 57718
September 29th, 2019

SD Game, Fish and Parks Commission
Joe Foss Building
East Capitol Ave.
Pierre, SD 57501

Dear Commissioners,

Currently in SD trappers must check traps every 3 and a partial day west river and 2 and a partial day east river. Prairie Hills Audubon Society (PHAS) petitioned to shorten that to 24 hours statewide, with variances allowed for emergencies and contingencies. 86% of the states in the USA have 24-hour trap check time and SD GFP's education course for new trappers, tells new trappers to check their traps daily, regardless of what the law says.

Many folks have been concerned about the "nest predator bounty program" and associated animal suffering and/or unintended take of non-target animals such as pets or endangered species. The nest predator bounty program existed for 5 months and 54,460 tails were submitted - it ended before August 31st due to "bounty limit" being reached.

The suffering of all species is reduced and the survival of unintended wildlife victims is improved with shorter trap check times. The folks at the Commission meeting speculated the SD trap check rule (3 and 2 days spent in the traps) was 20 years old, but we are not sure how long the rule had such limits.

SD sends out a voluntary survey to folks with furbearer licenses and about half of them respond and then SD GFPs estimates the "furbearer" harvest from those responses. In 2018, harvest estimate derived from furbearer license holders, was 68,589 fur-bearers trapped. That number would be a minimum estimate, as the estimate on "harvest" of coyotes, red fox, skunks, raccoons and badgers would be too small, as trappers don't need furbearer license to trap those. So the Bounty program almost doubled the take of species...but each year for maybe 20 years, a larger amount of animals could have spent 2 or 3 and a partial day in SD traps.

SD's excessive trap-check time is a longstanding issue for wildlife welfare in SD. If animals spend longer time in traps, they experience increased risks of exposure, hunger, thirst, predation, physical damage from traps/snares, damage to themselves trying to escape and shock. SD animal cruelty laws allow that anything SDGFP allows is not cruelty to animals. We hope you have empathy for the animals dying or suffering slowly in traps/snares and make

some changes in favor of animal welfare and shorten the time they spend in traps in SD.

The Humane Society of the United States proposed an amendment to our proposed rule that we consider a friendly amendment. We petitioned for these conditions:

"A GFP staff person may release or euthanize an animal held in a trap longer than 24 hours. Upon permission of & following the guidance from Game, Fish and Parks any person may release or euthanize an animal in a trap longer than 24 hours."

The HSUS suggested we allow for the humans to have an option to nurse animals back to health, in addition to animal release or euthanasia. We agree that is a good addition to the proposed rule.

At the September meeting we handed you a copy of a paper with the text of SDCL 41-8-28. "Trap robbing or injury as misdemeanor." We suspect this statute would preclude letting third parties release animals in traps, however you should check with your attorney about the statute. We were not aware of the statute when we wrote the proposed rule. So, after consultation with your attorney, you might want to delete that clause, but still retain other parts of the proposed rule change.

Thanks,

A handwritten signature in black ink that reads "Nancy Hilding". The signature is written in a cursive, flowing style.

Nancy Hilding
President
Prairie Hills Audubon Society



September 28, 2019

TO: South Dakota Game Fish & Parks Commission

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

RE: Proposed Trapping Check Times

Dear Chairman Jensen, Members of the Commission, and Director Leif,

South Dakotans Fighting Animal Cruelty Together (SD FACT) writes strongly in opposition of the proposed change to the trapping prohibition rules. With support from over 4,000 members, we provide the following:

It is clear that this proposed rule is in direct reaction to South Dakota constituents expressing their right to free speech. Because Nancy Hilding with Prairie Hills Audubon Society had the gall to advocate for animals and reasonably propose a change in favor of 24 hour trap check times, we feel GFP Commission reacted immaturely and abusively of their power to increase the trap check times for east river from every two days to every three days. This behavior is unacceptable, unwelcome and unworthy of the duty your body owes to the public trust.

We cannot begin our opposition without uniformly discussing how inhumane trapping is to begin with. The inexplicable push by the current administration to support and increase this activity for the “next century” is offensive. The calculated appeals to “tradition” are meaningless in light of your changing longstanding requirements. The

lengthened check times increases the inevitability of suffering for target animals and those that are indiscriminately trapped by happenstance.

This change only appears to be for the purpose of convenience and as a reactive tantrum to opposing views. We should all expect better of our government and its appointees.

Critically, this change refuses to take into account the effect upon our state's wildlife and those constituents who do not wholly support this activity.

When a citizen attempts to work within the system to make reasonable requests for incremental change, the authority is best served by not responding with aggressive and needless counter proposals. This behavior can only serve to further the gulf between citizens, undermine trust, and to promote more aggressive opposition rather than working together to align our values and preserve a healthy and positive environment for all citizens. That is the “tradition” South Dakotans should be actively trying to preserve.

Respectfully submitted,

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

sdfact.org



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Critically, this change refuses to take into account the effect upon our state's wildlife and those constituents who do not wholly support this activity.

When a citizen attempts to work within the system to make reasonable requests for incremental change, the authority is best served by not responding with aggressive and needless counter proposals. This behavior can only serve to further the gulf between citizens, undermine trust, and to promote more aggressive opposition rather than working together to align our values and preserve a healthy and positive environment for all citizens. That is the “tradition” South Dakotans should be actively trying to preserve.

In summary, SD FACT OPPOSES the change to the east river trap check times, and SUPPORTS the proposed 24 hour trap check time east and west river.

Respectfully submitted,

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