

Public Comments

Other

Michael Whitehead

Scottsdale AZ

Position: oppose

Comment:

Please do not allow the hunting of mountain lions. Just too few lions. Mountain Lions are a symbol of the American wilderness. This species continues to diminish. South Dakota has some mountain lions, but many states do not. Let's keep a few for future generations.

Robert Payne

Grove City PA

Position: oppose

Comment:

I strongly oppose the hunting of Mountain Lions in any state. It is truly not even hunting when GPS tracked hounds track the Mountain Lion and shoot them out of trees.

Amy Brown

Ellendale ND

Position: oppose

Comment:

To Whom It May Concern,

My name is Amy Brown, I currently reside in Ellendale North Dakota, but was raised in the Black Hills and consider Rapid City my home town. I am strongly invested in the welfare of the area and it's wildlife.

I am writing in opposition of the Draft Management Plan 2019-2029.

Since 1890, there have been only 25 confirmed fatal cougar attacks on people in all of North America—that's only 25 deaths in about 130 years—according to Dr. Paul Beier, recognized wildlife expert on cougar/human conflicts.

To put these numbers in perspective, you are at far greater risk from being shot by a hunter, killed by lightning, bees, dogs, or cattle. For example, every year about 100 people in the U.S. and Canada are fatally shot by hunters and 20-30 are killed by dogs.

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. Research at the Washington State University Carnivore Conservation Laboratory found that heavy hunting of cougars actually increases conflicts between humans and cougars. These findings run contrary to presumptions of wildlife management programs designed to continually increase kill numbers. 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. Juvenile lions that haven't developed the skill set needed to hunt prey animals are more likely to target opportunistic prey such as domesticated livestock and pets.

Mountain lions are a keystone species in their ecosystems, maintaining biological diversity for both prey animals and plant species. They are a necessary part of the Black Hills and keeping it the wild and beautiful place that it is.

Thank you for your time,
Sincerely,

Amy Brown
605-209-6902

Michael Waid

Yankton SD

Position: other

Comment:

I understand the significance of the Zebra Mussel problem BUT you're fighting a losing battle. I have open livestock tanks located more than 7 miles from Lewis and Clark Lake and at the end of last fall they were full of Zebra Mussels. These are tanks fed by relatively new wells in corrals and they are drained each fall. The only logical path for them to become contaminated is via small birds carrying the mussels either in their droppings or on their plumage. In addition while I understand you feel like you need to do "something", merely having the plug out of your boat does little to stop the spread of mussels or the other invasive species you're concerned about. There's too many hiding places in the boat hull and the engine. The only way it does any good is if the boat's cooling system and hull are completely dried down. While initially your informational and ticketing program had good intentions, it is now little more than a revenue generation tool for the state.

After not boating for many years, I took a boat out for the first time last summer and received a greeting from one your officers for a boat with a plug in that had been in dry storage for over a year. It and the cooling system were completely dry but my son visiting from Texas had put the plug in unknowingly before we left our driveway.

After telling me how he had written a warning to his boat mechanic friend a few weeks earlier your officer proceeded to write me up in front of a Romanian guest visiting with my son. It didn't make me particularly happy considering that I'm a veterinarian and have had multiple biology and zoology classes and understand very well the life cycle of mussels and other species. I know of the invasive species problem and go far beyond just having a plug out of my boat to do my part.

The law and your enforcement of that law is an excellent example of good intentions run amuck. I can only imagine how an unsuspecting visitor to our state feels when written up for having a plug in a dry boat on a highway. Perhaps if the officer from the Avon area who wrote me up for a dry boat had been patrolling near Lake Sharpe instead of Yankton, he would have stopped the invasion of that body of water.

Keith Bauman

Yankton SD

Position: other

Comment:

I have written this before

I don't understand why the state of SD will not charge a sticker invasive species sticker for 15 or 20 dollars per boat to help cover enforcement like Nebraska does. I live in Yankton and have to purchase this to fish 13 blocks from my house.

Every parking lot at every lake in sd has out of staters here enjoying the cheap fishing and we have fish. Why do you not increase the rates per out of state fisherman to help cover enforcement for issues like this?

The perch are biting and every boat from iowa Minnesota and Nebraska should kick in because they are here every weekend. Many boats and trucks are in the 50-75,000 dollar range and they will pay 15 to 20 dollars more to come and take home our fish.

If you keep doing what you've always done you only get what you already have.....

Dean Bobzean

Toledo OH

Position: other

Comment:

I've been a subscriber to SDFG for many years now. There have been many great articles in it of course through these years. One however that does not fit into that category is the article "Second Century Trapping Trio" from the summer of 2019 magazine. Who could possibly care about and why are these punks trapping skunks? I know why the bounty like you have on coyotes now. Remember I used to think to myself "what primitive neanderthals" these game management people were back then. Now low and behold your actually doing it again! By the way they once paid a bounty on Indian scalps too that's where scalping started. I have no problem with people killing animals for use such as eating but to kill wildlife just to manage animal populations to suite what works best for you is disgusting. Much like the white man did with the buffalo. In act you illiterates to this day even still honor the Buffalo Bill Cody types. The Indians were far better stewards of the land than you ever were, are or will be and they didn't even need a college people. Trust me - some day people will progress to the point in life where bounties don't exist. I thought we were already well past that. It may take another 100 or 150 years but believe me it will happen. In the mean time lets hope for a little justice in life - like maybe one of those 3 punk kids losing a finger or the .22 cal miss firing & that asshole father losing his eye. If that happens then write an article on that because we all could use a little good news once in a while in these days. It's absolutely amazing that you don't think these animals have a right to exist because they don't fit into your scheme of things - literally amazing.

Eric Schoenfelder

Lake Andes SD

Position: oppose

Comment:

Muzzleloader antelope season. We have enough seasons and with the advancements of muzzleloaders (300+ yard accuracy)it is just a way for those to get an early advantage to harvest trophy antelope.Also it would place that season closer to the rut, another advantage and take a week away from the archery hunters. I would think mentored season would be more reasonable before the rifle season

Eric Schoenfelder

Lake Andes SD

Position: oppose

Comment:

1-4x, 1-6x muzzleloader scope. They can purcher a red dot. Or go back to iron sites as the only legal option.

Anthony Filholm

Brookings SD

Position: oppose

Comment:

This is in regard to muzzleloader scope changes due to peoples inability to procure a 1x scope. Unlimited magnification scopes in areas that are centerfire rifle restricted. Scopes should not be used in regular muzzle loaders seasons. If they are allowed, maybe fixed power, no greater than 4x. They will always be available.

Louise Gray

Lompoc TX

Position: oppose

Comment:

60,000 of us, in this area, and we've never have had to kill them, and in fact we're grateful to have these Magnificent Wild Animals around us!

There's cattle here, but we don't have any problems.

Other areas that kill Cougars are suffering!! For example- They're overrun with rabbits, gophers, ground squirrels, etc.

There's a famous tourist spot a ways away, and a while back they killed off the Cougars and Coyotes but there's been ongoing trouble because they're **OVERRUN** with rodents, etc. so tons of holes made by the ground squirrels! Lawsuits are a big worry because of all the holes. Park is over 3,000 acres so no way to stop all the rodents, nor plug the holes.

LESSON LEARNED: Leave these big cats alone because **EVERY** time people interfere there is **ALWAYS BIG TROUBLE TO PAY!!**

Sincerely,
Mrs. Gray

Larry Menning

Chamberlain SD

Position: support

Comment:

If you are going to allow the use of a scope on a muzzle loader then why restrict the power of the scope used? This firearm is either a primitive device meant for very short range use or a modern one whose effective range approaches that of a center fire rifle. Out of respect for our wildlife and reputation as hunters we should take every step to make clean kills. I can support the arguments for either position but have trouble with a compromise position that may just wound more animals.

R Craig Oberle

Mellette SD

Position: other

Comment:

I am opposed to scopes with magnification on muzzleloaders. They are supposed to be a primitive weapon. If allowed put them in the regular gun seasons.

Nancy Hilding

Black Hawk, SD

Position: other

Comment:

- I very much care about SD's lions and look forward to seeing them in the flesh or noticing their tracks in the snow or mud.
 - I object to the overly aggressive mountain lion hunting "harvest limits" that SD has had in the past.
- I wish the mountain lion population in the Black Hills to be managed for a "stable" or "source" population and for population objectives and "harvest limits" to be set accordingly.
- I object to hound hunting in the Black Hills or the Prairie due to animal cruelty, trespass and fair chase concerns.
- I object to the 365 day, unlimited "harvest" and hunting with hounds on private and some public lands, allowed on the prairie.
- I wish for SDGFP to identify in the Prairie Unit the areas with good mountain lion habitat and manage the Prairie Unit to sustain at least some of the small mountain lion populations that have resident lions and breeding on the Prairie Unit.
- I wish for SD GFP to increase education programs about mountain lions for folks living in the Prairie Unit to increase understanding of lions and reduce fear of them.
- I object to killing predators to maximize the number of popular prey species (such as deer, elk, pheasants) that are available for hunters to hunt.
- I think the \$28 cost of a mountain lion hunting license is too small and should be increased

Nancy Hilding

Black Hawk, SD

Position: other

Comment:

Nancy Hilding
President
Prairie Hills Audubon Society,
P.O. Box 788
Black Hawk, SD 57718
<http://www.phas-wsd.org>

I here include part the action alert we have on our web page. We have sent a much longer letter to the staff before August 26th midnight deadline. We were a stakeholder at the stakeholder meetings and have been following this issue since 2005.

PHAS's Commenting Guidance on Draft Revision:

The status quo allows for overly aggressive hunting of cougars both in the Black Hills and in the Prairie. We question SD GFP 2017-2018 estimates of the cougar population numbers in the Black Hills, as confidence intervals are too large (occasionally the SDGFP annual cougar population estimate, is not believable due to inadequate field data collected.)? The intrinsic growth rate for mountain lion populations is established by researchers to be between 15-17%. For a ?stable mountain lion population, limiting human caused death to 12-14% of the adult/subadult population is recommended. This includes removing conflict lions, traffic deaths as well as hunting. PHAS supports management of the Black Hills area, as a "source" population to help recolonize eastern areas with cougars. To manage the overall area as a " source" population SDGFP needs "harvest objectives" below 12% of estimated adult/subadult population. The SD GFP plans to manage for population of 200-300 lions of all ages, which

seems to be a "decreasing" population or "sink" objective (compare Plan's Figures 13 and 15). Managing the Black Hills as a "sink" is also Wyoming's objective for the Black Hills. A "sink" means the habitat will always have fewer lions than it can support and younger lions will be migrating in to fill vacant habitat. Mountain lion populations are self regulated and don't over populate. There is proof in some states in the USA, that aggressive hunting seasons replace experienced adult lions with inexperienced, younger lions who get into conflict with humans more and replacement males may engage in more cougar infanticide.

One of the objectives of the Plan is: " Manage mountain lion populations for both maximum and quality recreational hunting opportunities, considering all social and biological inputs." (see page xi). We believe this prioritization of hunter wishes, is unbalanced. Mountain lions have important ecological roles and USFWS shows that wildlife watching is much more popular than hunting; Total wildlife watcher 86.million vs total big game hunters: 9.2 million. (2016 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation: National Overview -- https://wsfrprograms.fws.gov/subpages/nationalsurvey/national_survey.htm). The Plan should discuss creating a way for wildlife watchers or wildlife enthusiasts to donate to SD GFP lion management efforts, as to a certain extent GFP is funded by dollars earned from hunting/fishing licenses, which creates an imbalance in relative influence of interest groups.

Depredation by lions on livestock and pets is low in SD, yet this is used repeatedly as a justifications for recreational hunting. Plan needs to show more details on any actual depredations and differentiate for when actions or policy are driven by actual confirmed depredations vs. by landowner's fear of depredations. We object to the killing of native wildlife predators to maximize production of a prey species for a better prey "harvest" by human predators. Desire to maximize elk calf survival is the justification for hound hunting allowed in Custer State Park. In the past concerns by hunters about cougar predation of ungulates helped drive up the entire lion "harvest" limits in the Black Hills.

GFP's current goal is not to manage for having cougar populations on the prairie, they just manage for a sustainable population on the Black Hills. Thus the prairie SD has a 365 day season & unlimited "harvest". Hunting with hounds is allowed on prairie private land & also allowed starting on private land and moving onto some public lands by SDGFP. Hound hunting is much more effective than "boot hunting". There are also animal cruelty issues for both the hounds and lions, trespass issues and "fair chase" issues. Oglala Sioux Tribe and Standing Rock Sioux Tribe have lion hunting seasons. Rosebud allows for trapping by tribal members, but not cougar hunting.

We support protection of small breeding populations or breeding individuals in suitable habitat on the SD prairie. GFP's understanding of & discussion of prairie lions & prairie habitat section is woefully inadequate (just 2 pages, starting at page 76 of 112 pages). There is evidence of 4 dead lactating females & a few kittens (dead & alive) - this breeding has been occurring Oglala, Mellette, Bennet and probably in Todd Counties and in past possibly it was at Yankton Sioux Tribe lands. The 4 mother prairie lions who were lactating or with evidence of past lactation were killed by hunters or trappers. We believe SDGFP needs to disclose more data on prairie lions & their habitat. GFP needs to discuss the conditions needed for viable cougar populations on the prairie. The inadequacy of discussion on the prairie is one of the most egregious failings of this Plan.

GFP needs to discuss the conditions needed for sustaining viable cougar populations on the prairie and have viability goals on at least some prairie subsets, but when habitat & connectivity corridors involve joint jurisdictions, consultation and cooperation with tribes should occur first. SDGFP needs more aggressive education programs about lions for prairie communities and if Native American Governments want help, grants or resources could be given to help them study their mountain lion populations and this could be discussed in the Plan Revision. Given the need to supplement the Draft with much more prairie lion information, another supplemented version is needed for public review.

Both the Black Hills and the Prairie Units need to be broken up into smaller subsets, creating an option for different management goals in different subsets. SDGFP needs the option to manage the subsets of the prairie area with good lion habitat and/or evidence of breeding differently than other prairie areas without good habitat.

We also support creating a sanctuary area as a subset in the Black Hills, in addition to the federal Parks, where lion hunting is not allowed. We support designating Custer State Park as a sanctuary area in the Black Hills. It is contiguous with Wind Cave National Park, where hunting is prohibited. A state park should be a place where people can view wildlife, not kill animals.

The current cougar hunting license fee of \$28 dollars needs to be raised. Trapping/snaring of lions should remain illegal, but "incidental take" of lions in snares/traps should count against the hunting "harvest limit".

Nancy Hilding

Black Hawk SD

Position: other

Comment:

Nancy Hilding
President
Prairie Hills Audubon Society
P.O. Box 788
Black Hawk, SD 57718
<http://www.phas-wsd.org>
Sept 1st, 2019

MAP LINK - 23 YEARS OF SD COUGAR MORTALITY DATA,
Denise Petersen (staff of Mountain Lion Foundation) has mapped data from the SD GFP cougar Mortality data spreadsheets.

Interactive map - layers are available for type of death, sex & by year of death. Click on the dot to learn about the dead lion, it's age, sex and cause of death.

For years SD GFP has been insisting there is no breeding on the prairie...just dispersers, or no suitable habitat. We believe biologically there is suitable habitat and breeding, the issue is social acceptance, not biological limits.

As part of our on-going campaign to get breeding by prairie lions recognized, we suggest you visit this link and search for sex and age of lions on the prairie. Please note the 4 dead kittens found on the prairie. We also believe not all tribal data on lion mortalities may be included in this map derived from SD GFP data base. Although it does not show up on this chart, 4 females with past proof of lactation have been found on the prairie in the areas in or near Oglala Sioux Tribe and Rosebud Sioux Tribe.

Thanks to Denise Petersen of MLF for creating this interactive map & thanks to SDGFP for sharing their mortality records.

Interactive maps with several layers:

<http://mountainlionfdn.maps.arcgis.com/apps/webappviewer/index.html?id=d0181adaffd74bf287acf4b6a6a38d8b>

maps shown each year only

<http://bit.ly/SDLionmap>

Nancy Hilding

Black Hawk SD

Position: other

Comment:

Nancy Hilding
President
Prairie Hills Audubon Society,

To SD Game, Fish & Parks Commission,

We find the Draft Revision lacking in data especially on the prairie lions & the estimated cougar populations each year split between adult/sub adult & kittens. We hope the staff has added data and analysis since August 26th. However we won't be able to review that before you decide to approve, if you approve it on Sept 5th-6th. We hope you continue the approval of the Plan Revision at least till October Commission meeting

Donna Watson

Deadwood SD

Position: oppose

Comment:

I typed in "oppose" because I am certain that the new proposed GF&P mountain lion hunting quota will simply continue the department's original intent to eradicate the species. Although writing in opposition has done and will continue to do no good whatsoever, here is my assessment for what it's worth

Nancy Hilding

Black Hawk SD

Position: other

Comment:

Nancy Hilding to SD GFP

This is 2001 land area data relative to the proposal to make trapper ID only apply in SD to the GFP subset of SD public lands. You must consider all SD public lands, no matter the state agency/local government involved and all federal lands. I would send you the actual chart, but your on-line commenting does not allow attachments.

Table 1. Land acreages by ownership categories in South Dakota
(Source: Smith 2001, unless otherwise noted)

Ownership statewide acres % of statewide

total private land 36,875,256 78.7%

U.S. Forest Service

national grasslands (866,902)

national wildlife preserves (27,038)

national forests (1,125,318)

2,019,258

U.S. Army Corps of Engineers¹ 138,446

U.S. Bureau of Land Management 266,278

U.S. Fish and Wildlife Service

waterfowl production areas (148,142)

national wildlife refuges (46,713)

194,855

National Park Service² 248,217

U.S. Bureau of Reclamation³ 34,185

Federal lands subtotal 2,901,239 6.2%

Tribal trust lands⁴ 5,202,811 11.1%

S.D. Office of School and Public Lands⁵ 807,000

SDGFP

game production areas and water access
areas (185,670)

Division of Parks and Recreation and
Custer State Park (99,952)

285,622

Other state lands 373,282

State lands subtotal 1,465,904 3.1%

water 428,105 0.9%

TOTAL (based on the identified sources) 46,873,315

Barbara Garakian

Rancho Mirage CA

Position: oppose

Comment:

STOP THIS CRUELTY.. it's animal abuse and they suffer. Animals need to be free

Julie Anderson

Rapid City SD

Position: oppose

Comment:

To: Rachel Comes

Please forward this letter to the SDGFP Commission as public comment for the Mountain Lion meeting on Sept. 5th and 6th in Spearfish.

Thank You,

To: SDGFP Commissioners

The hunters of South Dakota complain because they claim the deer population in the Black Hills is too low because of mountain lions. The ranchers claim the mountain lions are killing their livestock. People living in the Black Hills complain because there are mountain lion sightings in their backyards or close to schools. The hound hunters want to kill mountain lions for recreation, as do trophy hunters.

Since a mountain lion season in the Black Hills was initiated, every year there are more and more complaints. This is because you are allowing the taking of the healthiest animals who would never come into conflict with humans for trophy and hound hunters, thus creating juvenile lions with no hunting skills who will predate on anything that will sustain them. The 2nd Century Initiative has thrown out science as any basis for wildlife decisions and now GF&P endorses killing to preserve hunting and trapping traditions as its priority.

The majority of the public abhors trophy and hound hunting, and giving the majority a voice should be a main priority of this agency. Mountain lions are self-regulating in their numbers and hunting them to sustain the population is a false premise. I call into question the population of lions estimated in the Black Hills, as the killing quotas in the past 2 seasons have not been met.

This agency needs to reassess the science involved with their decision making and give these animals a place to live where they won't be hunted, and their natural life cycles and habits can be observed. You also need to consult other agencies like the Humane Society of the United States and work in conjunction with their biologists to estimate the mountain lion population. They also have information that would help reduce conflicts with lions and people.

GF&P also needs reassessment of what drives their decisions to kill mountain lions, like quality mountain lion recreational opportunities (page 80, Strategy 2E).

Lastly, it is never stated in your plan that these animals feel, raise families and show love and affection like all felines. This is never taken into consideration when factoring in a season. Mountain Lions have a right to exist without human interference, especially in Custer State Park. There is absolutely no need to kill any of these animals in the park to satisfy the blood thirst of trophy or hound hunters.

I implore you to please, listen to your constituents who do not hunt, and wish to see these animals alive and in their natural habitat, not on someone's wall.

Sincerely,

Julie Anderson
845 Virginia Lane
Rapid City, SD
57701

Susan Theilen

Chilliwack BC

Position: support

Comment:

sick. Hate traps. If you must hunt. Be like an animal.. Hunt your prey like all other animals. Sick and disgusting. If you do use traps. Be a human and check them every few hours.....For human sake .

Teah Homsey-Pray

Deadwood SD

Position: oppose

Comment:

I object to the aggressive proposed mountain lion hunt. I certainly see no reason for unfair hound hunting of this apex predator. Can SDGF&P identify the Prairie Unit Areas of gold lion habitat and then manage this unit in order to sustain the small mountain lion populations?

Maybe the science of mountain lions should be under closer study and then taught to our youth and the public? Maybe then SD would realize these animals are not our enemy.

Trapping Prohibitions (Trap Check Times)

Dan Varns

Sioux Falls SD

Position: support

Comment:

Make trapping more humane and protect unintended victims

Barbara Thurman

Aberdeen SD

Position: other

Comment:

please change the rules to check the traps every 24 hours. Animal cruelty is not acceptable for a state that prides themselves on hunting and fishing. More than 24 hours is cruel to any animal caught, even rodents. They should not suffer unnecessarily.

Lacey Jackson

Sioux Falls SD

Position: other

Comment:

The BEST scenario for traps in South Dakota would be to ban all but live animal traps. Steel-jaw, snare, conibear traps, etc, have NO place in a humane world.

That being said, I am aware the likelihood of that happening is the same as Kristi Noem voting to legalize recreational marijuana.

The only available option for the potential to be more humane to not only wildlife but family pets that sometime become victims of these devices, is to shorten the required check time. Traps should be checked at a minimum of every 24 hours. This timeframe would make the safe release of pets, endangered species, and other unintended victims more likely.

Heidi Hanson

Sioux Falls SD

Position: oppose

Comment:

I feel trapping is incredibly inhumane and should be stopped completely. Innocent animals suffer , it's unacceptable . Knowing this state I doubt we will ever outlaw trapping though so I strongly urge you to change to trapping rules. Those traps need to be checked daily to prevent unnecessary suffering and harm to animals caught in them. Period.

Emelie Haigh

Volga SD

Position: support

Comment:

I support changing the trap check time to 24 hours. This will help pets who have been caught accidentally get home sooner and also prevent unnecessary suffering for any trapped animal. Thank you.

Karen Conley

Box Elder SD

Position: support

Comment:

Traps need to be checked AT A MINIMUM of every 24 hours. Too many unintended targets suffer needlessly due to trapping. It is inhumane to leave any animal in a trap for any length of time, let alone 2-3 days or longer. Do the right and humane thing. If you must trap at all, those traps should be checked no less than every 24 hours. While I do not support trapping, if it won't go away, we can at least be as humane as possible about it.

Angela Duvall

Spearfish SD

Position: support

Comment:

Trapping animals and leaving them for days is inhuman! Please change the law to 24 hours!

S.F. Lee

Belle Fourche SD

Position: oppose

Comment:

I find it inhumane that west river only requires traps to be checked every 3 days. What if your pet/child was trapped for that long?

Cecilia Banner

Longmont CO

Position: support

Comment:

Traps are a despicable means of making a living, via the tortuous death of animals. Reducing the misery, pain, fear of these unfortunately murdered can sadly only be considered the slimmest of mercies. This is doing the absolutely least possible to mitigate this extreme cruelty.

Jana Haecherl

Custer SD

Position: oppose

Comment:

These trap check times are way too long. It's inhumane to leave an animal in a trap for that long - many trapped animals will chew their own limbs off in an attempt to free themselves after that long, and if pets are accidentally caught, they will be in very bad shape before they are found and returned to their rightful owner. Please shorten the time required to check traps.

Peggy Mann

Aberdeen SD

Position: oppose

Comment:

Ultimately I would like traps banned such a barbaric practice. At the minimal trap should be checked every 24 hours -3 days is ridiculous and beyond cruel. Let's show some compassion and think of the animal that as suffering please please.

Mickie Hortness

Rapid City SD

Position: support

Comment:

I support changing the rule regarding trap check times. I believe they should be checked at least once every 24 hours. It is not only the targeted animals that get caught in these traps, but also endangered species and other wildlife as well. Not to mention the pet dogs and cats that then suffer needlessly for 2 Or 3 days in these traps. It's barbaric enough without then subjecting these creatures to lengthy suffering in these traps.

Margaret Mclaughlin

Sturgis SD

Position: oppose

Comment:

inhumane on all levels

Darren Johnson

Vermillion SD

Position: support

Comment:

I am urging the SDGFP Commission to accept this rule change and require traps to be checked every 24 hours!

Nancy Barondeau

Roscoe SD

Position: other

Comment:

Please, trappers need to check traps daily. Animals suffer tremendously in a trap. Help them suffer less. Thank you.

Sandy Carlson

Columbus NE

Position: oppose

Comment:

Stop trapping animals! 3 day check time is unacceptable. Traps should not be allowed. The fact that they are only checked every 3 days is animal abuse and cruelty. I am sure that the trap checks aren't unforced so ban them altogether. I pray to Jesus for trapping be stopped once and for all.

Lisa Anderson

Aberdeen SD

Position: support

Comment:

No comment text provided.

Jerilyn Rich

Deadwood SD

Position: support

Comment:

I support the change that traps be checked more frequently.
Traps should be checked at least every day, not once every two or three days!

Vicki Koebernick

Rapid City SD

Position: support

Comment:

First, traps are cruel to begin with. Second, if they are allowed, it would be inhumane not to require them to be checked daily!

Donna Dugger

Rapid City SD

Position: support

Comment:

Check traps every 24 hours.

Jolyn Harder

Hot Springs SD

Position: support

Comment:

I support the proposal of every 24 hours. It's not fair for any animal to sit in pain that long. Not to mention they could starve, get dehydrated, get ate on, and cause more damage to themselves then they have already sustained. Any household pet could get out and caught in one and die because traps aren't being checked often enough. 24 hours would help drastically!

Tacy Paul

Spearfish SD

Position: support

Comment:

Leaving an animal in a trap beyond 24 hours, subject to weather and dehydration is cruel and inhumane.

Elaine Lanier

Murray NE

Position: support

Comment:

Trapping is already a barbaric practice. There is no reason to cause such immense suffering for even 24 hours let alone longer. Imagine having one of these devices on your own limbs for days. Or even worse, a small child that has wandered off.

Bob Johnson

Philadelphia PA

Position: support

Comment:

I'm fully against trapping as it is brutally inhumane and of traps won't be abolished than they should be at least checked more often.

Ray Hayes

Deadwood SD

Position: support

Comment:

Ban trapping altogether. Just because it has always been done doesnt make it right

Leah Kelly

Sioux Falls SD

Position: support

Comment:

Please pass this measure and consider banning trapping altogether as trapping is a cruel and inhumane practice that has no place in a civilized society.

Heather Allmendinger

Sioux Falls SD

Position: support

Comment:

sometimes domestic animals get caught in the traps. They have a greater chance of survival the sooner they are caught. Check the traps!!

Patty Ellsworth

Spencer IA

Position: other

Comment:

I would like traps abolished or checked daily.

Jamie Moore

Rapid City SD

Position: other

Comment:

Absolutely need to check them every 24 hours!!

Heather Schiller

Sioux Falls SD

Position: support

Comment:

Need to be checked once every 24 hours!

Gwyn Witte

Wess Springs SD

Position: support

Comment:

I approve the 24 trap check rule proposal.

Lisa Acheson

Chester SD

Position: support

Comment:

No comment text provided.

Lisa Acheson

Chester SD

Position: support

Comment:

Duplicate

Erin George

Rapid City SD

Position: support

Comment:

No comment text provided.

Karon Larson

Deadwood SD

Position: support

Comment:

Please check traps every 24 hours

Walter Weiss

Douglasville GA

Position: support

Comment:

It is definitely animal cruelty to leave animals in traps. Actually just using the traps is cruel. It's 2019 - we don't need to be trapping animals - especially indiscriminately like these traps do. If 24 hours is too inconvenient for you - do something else

Gerry Morgan

Tucson AZ

Position: support

Comment:

Even 24 hours is too long for an animal to be stuck in a trap. Even one minute is too long. There should be no traps. But this is a small step in the right direction.

Jennifer Swilley

Hattiesburg MS

Position: other

Comment:

Have we turned into a barbaric society with no compassion whatsoever? Leaving an animal to suffer in a trap for 3 days is UNACCEPTABLE! Traps are inhumane to begin with! 24 hours must be the limit set for a trap to go unchecked under any circumstances!!!

Lydia Waltj

Rapid City SD

Position: support

Comment:

Traps should be required to check every 24 hours. No animal deserves to suffer. If you can't check your trap everyday you shouldn't be a trapper.

Amy Miner

Yankton SD

Position: support

Comment:

Trappers should check traps every day. It's the responsible thing to do.

Brittany Kimball

Brandon SD

Position: support

Comment:

24 hrs mandatory checks

Carolyn Behrens

Rapid City SD

Position: support

Comment:

If supporting it means I am in favor of a maximum time of checkin traps is every 24 hours then I am definitely in favor. Anything longer than that is extremely inhumane not only for the targeted animals but also for unintended victims. Personally, I think that there are better alternatives than trapping at all. But since I know trapping will continue in SD at least let's do the right thing in taking a positive step and making sure laws are changed to indicate any time greater than 24 hours is inappropriate and inhumane. Thank you for accepting my comment.

Dawn Biesecker

Madison Township PA

Position: support

Comment:

This sort of torture should have gone out with the caveman. How would the persons who is setting these traps feel about how soon they would like to have someone check on them. Oh I forgot, to have empathy for any living creature you would have to have a heart and soul.

Tina Startz

Deadwood SD

Position: support

Comment:

Please let's be Humane in our hunting habits. 24 hours. Let's not let them suffer or be attacked or any of the other things that can happen if you wait longer than that. As well as animals that shouldn't be trapped or that were trapped by accident. Please check every 24 hours

Volunteers Neill

Box Elder SD

Position: oppose

Comment:

Trapping times should be 24 hours, NOT 72. Honestly, trapping should be outlawed. It is cruel, barbaric and inhumane practice.

Heather Moyer

Henderson MD

Position: support

Comment:

they should have to check the traps more often, there are to many animals getting caught that are not the intended target

Ray Maize

Pierre SD

Position: oppose

Comment:

I totally oppose this proposal for trap checking. There is no reason that a trapper would not check their traps and snares earlier than the set times if it was felt that it was needed. The set check times makes it feasible to catch an animal both financially and keep from chasing targeted animals away. There is a saying, "The cruelest thing we can do to wildlife is fail to manage it."

Sami Kratovil

Brookings SD

Position: support

Comment:

Traps can be inhumane and should be banned. They frighten animals and will cause massive suffering. On behalf of ALL animals I urge you to BAN traps or at least check them every 24 hours (or sooner).

Sharon Tschetter

Hitchcock SD

Position: support

Comment:

No comment text provided.

Teresa Mccarty

Norfolk VA

Position: oppose

Comment:

Stop the barbaric assault on innocent animals, its cruel and needs to be stopped completely. No animal should have to endure this.

Donna Reil

Rapid City SD

Position: support

Comment:

Require 24 hour checks on traps !!!!

Robert Reil

Rapid City SD

Position: support

Comment:

Require 24 hour checks on traps !

Elizabeth Koehler

Sioux Falls SD

Position: support

Comment:

I approve the 24 hour trap check rule.

Eric Schoenfelder

Lake Andes SD

Position: oppose

Comment:

Not feasible. Don't allow antis to get into our hunting and tapping heritage.

Josh Bauman

Brookings SD

Position: support

Comment:

Traps should be checked daily!

Jo Kephart

Vermillion SD

Position: support

Comment:

Non-targeted animals and pets have a much better chance of survival if traps are checked at least every 24 hours. No animal deserves to suffer in a trap for days on end. Thank you.

Chris James

Egan SD

Position: support

Comment:

I SUPPORT 24 hr trap check timelines.

Susan Price

Levittown PA

Position: support

Comment:

No longer than 24 hours and that is too long.

Lucinda Schuft

Hot Springs SD

Position: support

Comment:

I support changing to the 24 hour check requirement. Humane use of traps is a must. I wish we would go to live traps and then a fast quick death for the animals rather than suffering in the cruel leg traps.

Jeanne Reif

Deadwood SD

Position: support

Comment:

No comment text provided.

Patricia Stock

Olmsted Falls OH

Position: support

Comment:

To do otherwise is inhumane

Shawna Gardner

Sioux Falls SD

Position: support

Comment:

Traps need to be checked at least once every 24 hours!!!

Jaleana Dixon

Fairburn SD

Position: support

Comment:

3 days is too long and inhumane!

Gregory Palmer

Nemo SD

Position: support

Comment:

Trap the governor! She started this with her free trap giveaway!! This is the 21st century, start acting like it!! This is inhumane to trap at all!! Do away with allowing trapping!

Mike Hanson

Sioux Falls SD

Position: support

Comment:

I support changing the existing trapline checktimes (from every three days West River and every two days East River) to every 24 hours. I don't like trapping for any length of time but believe it's barbaric to leave any animal trapped for days -- and even worse when it's an unintended or protected animal.

Stephany Fischer

Rapid City SD

Position: support

Comment:

Length of time of pain and suffering stuck in a trap is very cruel.

Katrina Kellogg

Loveland CO

Position: oppose

Comment:

Please!! This is animal cruelty suffering totally. Adog? Why? Eagle? Why etc!??
And the timing to check traps? They r suffering for days. Please change this they are GODS creatures.

Ann Kinney

Minneapolis MN

Position: oppose

Comment:

Trapping should be banned!!! So incredibly cruel and sadistic. Can't believe it still exists :'(

Kira Leesch

Sioux Falls SD

Position: oppose

Comment:

Traps should be checked DAILY to ensure no unintended animals were snared. For them to suffer while waiting for the trapper to return to check the trap is horrid to say the least. Change the law to ensure trappers MUST check the traps after no longer than 24 hours.

Peggy Ellingson

Sioux Falls SD

Position: support

Comment:

A responsible trapper should be checking on a daily basis to avoid pain & suffering of any of the trapped animals - but for those that shouldn't have the suffering!

Linda Greene

Sioux Falls SD

Position: support

Comment:

I think trapping should be done away with. It's sadistic and cruel. Fur should only be on an animal not a human being.

Bridget Vandeputte

Rosholt SD

Position: support

Comment:

Trappers should be more invested and involved in their ventures!

Jason Solano

Rapid City SD

Position: support

Comment:

No comment text provided.

Pamela Bacon

Lexington NC

Position: oppose

Comment:

Traps should be checked every FOUR hours. Better yet, just end trapping period. It's nothing but cruelty and completely unnecessary.

Jennifer Reasoner

Brandon SD

Position: other

Comment:

Please check daily. Please. Very inhumane. Suffering.

Mary Solano

Rapid City SD

Position: support

Comment:

No comment text provided.

Joseph Solano

Rapid City SD

Position: support

Comment:

No comment text provided.

Ashley Mcneary

Aberdeen SD

Position: support

Comment:

No comment text provided.

Virginia Morse

Newell SD

Position: support

Comment:

As a farmer I believe traps should be checked every 24 hours to avoid any animal suffering.

Suzanne Hodges

Sacramento CA

Position: support

Comment:

Trapping is barbaric and due to the trauma, pain it causes traps should be checked every 24hours to help ensure no domestic animals, pets are victims, as well as aiding wildlife caught in timely manner.

Terri Minnick

Palos Park IL

Position: oppose

Comment:

Any of you who think it is ok to languish in a trap for 3 days should put one one and see if that works for you-- before someone comes to end it (and is that even a humane ending ?)

Stardust Red Bow

Rapid City SD

Position: support

Comment:

I fully support the change in trapping regulations, which will require traps to be checked within 24-hours.

Coree Mccabe

Rapid City SD

Position: support

Comment:

Please reduce trap check times to 24 hrs or less. I'd just as soon see trapping banned due to the cruel nature of harvesting these animals but at the very least minimize their suffering!

Dean Parker

Sioux Falls SD

Position: support

Comment:

I am writing in support of modifying rule 41:08:02:03 to require trappers to check their traps at least once every 24-hours.

The current trap check times of 36-hours west of the Missouri River and 48-hours east of the Missouri River (with extensions for weather and illness) are not acceptable.

Animals caught in traps for several days may be attacked by other animals, starve, dehydrate, or mangle their mouths and limbs in futile efforts to free themselves.

Trappers also catch non-targeted animals such as endangered species and pets - these animals have a much better chance of survival if traps are checked at least once every 24 hours.

In the instruction given during SDGFP classes on trapping, your agency advises beginning trappers to check the traps once a day, "regardless of the law". The Association of Fish and Wildlife Agencies trapper education manual instructs new trappers to check traps daily.

Please approve the 24-hour trap check rule change to align South Dakota's trapping regulations with where ethical trappers already agree they should be – thank you.

Sara Parker

Sioux Falls SD

Position: support

Comment:

I am writing in support of modifying rule 41:08:02:03 to require trappers to check their traps at least once every 24-hours. The current trap checks times of 36-hours west of the Missouri River and 48-hours east of the Missouri River (with extensions for weather and illness) are not acceptable.

In the instruction given during SDGFP classes on trapping, your agency advises beginning trappers to check the traps once a day, "regardless of the law". The Association of Fish and Wildlife Agencies trapper education manual instructs new trappers to check traps daily.

Animals caught in traps for several days may be attacked by other animals, starve, dehydrate, or mangle their mouths and limbs in futile efforts to free themselves. Checking traps every 24-hour would reduce the amount of time animals spend suffering in traps and snares.

Trappers also catch non-targeted animals such as endangered species and pets - these animals have a much better chance of survival if traps are checked at least once every 24 hours.

Please approve the 24-hour trap check rule change to align South Dakota's trapping regulations with where ethical trappers already agree they should be – it would reduce animal suffering and give non-targeted animals a better chance of survival.

Kim Zilverberg

Brookings SD

Position: support

Comment:

I believe that trappers should check their traps every 24 hours so animals do not suffer.

Natalie Galasso

Mamaroneck NY

Position: support

Comment:

No comment text provided.

Mary Lonowski

Brookings SD

Position: support

Comment:

First, trapping is inhumane and cruel. As a hunter in my youth, my family always considered trapping as the lazy man's way to kill. Second, I'd like to go on record in support of changing the trap check time to 24 hours.

Kelly Morgan

Rapid City SD

Position: support

Comment:

I SUPPORT the 24-hour trap check rule change

Jack Morgan

Rapid City SD

Position: support

Comment:

I SUPPORT the 24-hour trap check rule change

Faisal Khan

Vadadro IN

Position: support

Comment:

Parrot

Taryn Deboer

Parkston SD

Position: support

Comment:

No comment text provided.

Jamie Al-Haj

Rapid City SD

Position: support

Comment:

I am in support of revising traps check time to 24 hours statewide. The current 72 hour West River requirement and 48 hour East River requirement lacks any regard for the animal trapped. The proposed 24 hour check time is responsible and more humane. It will result in less suffering for all trapped animals, unintended (dogs, cats, birds, etc) and intended. Please consider all lives effected when a trap is set.

Maria Hatch

Rapid City SD

Position: oppose

Comment:

Please implement a 24 hour trip check rule

Linda Torlay

Fort Myers FL

Position: support

Comment:

Traps needs to be checked every 24 hours. The law at the least needs to be humane if the barbaric practice of trapping is going to be legal.

Julie Padilla

Madison WI

Position: oppose

Comment:

Please check more often, these poor animals that get trapped are in agony, it's cruel and inhumane....

Sheena Thomas

Sioux Falls SD

Position: support

Comment:

I support the 24-hour rule change. Please make the change across the state!

Kasie Heiden

Vermillion SD

Position: support

Comment:

No comment text provided.

Jared Heiden

Vermillion SD

Position: support

Comment:

No comment text provided.

Jill Andersen

Sioux Falls SD

Position: oppose

Comment:

This policy is absolutely inhumane. South Dakota is a better state than this. Allowing animals or any living thing to suffer for three days is sick. Someone please stands up and lead to end this cruelty.

Meliss A Dassinger

Rapid City SD

Position: oppose

Comment:

Trapping is a part of the Midwest way of life.

Trapping had become much more

Humane and animal rights groups are spreading false propaganda of "trapped kittens" and "birds" that are very rare example and some are not even from this country.

I urge you to ensure your trapping legislation is in line with trapping standards, not opinions from animal rights fanatics that want to eliminate not only trapping but also hunting and fishing.

Do not give an inch to the animal rights ideologues.

Send a clear message that the major it supports hunting fishing and trapping as a way of life and a means to ensure we have healthy populations of all animals, to include domestic and wild.

Julie Padilla

Madison WI

Position: support

Comment:

I was confused on my previous vote, after I read further. I SUPPORT the idea of check times being more often, I read these animals are in these traps for days! This is cruel and inhumane.

Joan Frevik

Sioux Falls SD

Position: support

Comment:

Support checking traps every 24 hours.

Janet Lowe

Wessington Springs SD

Position: support

Comment:

No comment text provided.

Lisa Sullivan

Bainville MT

Position: oppose

Comment:

Why this has not gotten national attention/help is beyond my comprehension. I thought we were progressing with animal rights. This needs to be changed NOW

Melissa Cosme

Spearfish SD

Position: support

Comment:

I support the 24 hour check times!

Chancey Feller

Pierre SD

Position: oppose

Comment:

No comment text provided.

Tonya Graham

Sioux Falls SD

Position: other

Comment:

Trapping on public land should be illegal but since it's not, the traps should be checked at a minimum every 24 hours.

Jenny Walker

Gretna NE

Position: oppose

Comment:

It confuses me as to why there are not trap checks every 24 hours when there is a great probability of a protected species being trapped and potentially dying. As heartless as that is, any animal wild or domesticated suffering a great deal even for a few hours is beyond me. I hope you take into consideration your own animal suffering to a degree the traps make added to a 2-3 day period. Disgusting. At a MINIMUM the law NEEDS TO CHANGE TO 24 HOURS! thank you

Jennifer Watters

Parma OH

Position: oppose

Comment:

Please change times to every 24 hours!!

Ellen Watters

Parma OH

Position: support

Comment:

No comment text provided.

J W

Parma OH

Position: support

Comment:

Does not meet the criteria - no first or last name

Sally Hamlin

Pierre SD

Position: other

Comment:

These traps are ridiculous and not humane. The people that put out these traps should have to feel what these traps feel like and suffer from them

Stephanie Samavarchian

Rapud City SD

Position: support

Comment:

It is a no brainer that traps MUST be checked every 24 hours to avoid needless suffering of both intended targets as well as UNINTENDED targets! These are live animals that feel pain and fear and needn't suffer prolonged and angonizing deaths. It is the RESPONSIBLE thing to do!

Sheri Whitethorn

Madison SD

Position: oppose

Comment:

Trapping is an overwhelmingly painful and cruel relatively random catcher of animals. It is only compounded the longer an animal is captive in the trap. It is completely inhumane to not check these traps daily so as not to prolong the agony of these animals.

Kim Bullus

Sioux Falls SD

Position: support

Comment:

This is the 21st century...find other ways. My dog was caught in a trap 4 years ago...her leg has never been the same.

Tommi Lundgren

Sioux Falls SD

Position: support

Comment:

Three days between checking traps is way too long. No animal whether domesticated or not deserves to suffer for 3 days because humans don't want to be bothered by checking the traps on a daily basis. The traps themselves are bad enough without making them suffer like that.

Leah Boule'

Whitehall NY

Position: oppose

Comment:

Traps(I hate them)should be checked AT LEAST every 24 hours. Twelve hours would be better. I hope they are outlawed someday soon.

Tina Ladd

Los Angeles CA

Position: oppose

Comment:

Animals should not have to suffer when caught in these vicious traps. Outlaw them.

Patricia Braun

Rapid City SD

Position: other

Comment:

please, please require trappers to check their traps every 24 hours without fail. If the trapper is ill- don't set the trap or find another to check. Weather ? Not a reason to not check - it's South Dakota- there is ALWAYS weather!

Madalina Sterpu

Indian Wells CA

Position: oppose

Comment:

Stop the traps, 3 days the animal will suffer and die, how can you accept that torture?

Renee Lefthand

Freeman SD

Position: oppose

Comment:

You at least need to change the checking trap times why don't u all put your hand in one and wait 3 days I oppose traps like this and also they need to be checked daily

Eden Slate

Armour SD

Position: support

Comment:

No comment text provided.

Madalina Sterpu

Indian Wells CA

Position: support

Comment:

Animals caught in traps for several days may starve, dehydrate, be attacked by other animals, or mangle their mouths and limbs in futile efforts to free themselves

David Goronja

Howard SD

Position: support

Comment:

Traps need to be checked more often.

Amanda Hegg

Vermillion SD

Position: other

Comment:

Traps should be checked every 24 hours, if trappers consider that an inconvenience and cannot accept the responsibility of minimizing animal cruelty in the practice, they should not be trapping.

Amanda Hegg

Vermillion SD

Position: support

Comment:

No comment text provided.

Darsha Cecil

Spearfish SD

Position: oppose

Comment:

Please have traps checked every 24 hours

Darsha Cecil

Spearfish SD

Position: support

Comment:

No comment text provided.

Kendra Perry-Koski

Winner SD

Position: oppose

Comment:

I'm opposed to letting animals suffer for 2 or 3 days in a trap. It's barbaric and inhumane to allow an animal to suffer for up to 3 days. Often times family pets or other wildlife are caught and waiting 3 days can mean death to a pet or eagle. Trapping should be prohibited but at the very least traps need to be checked every day.

Jodi Mercer

Rome OH

Position: other

Comment:

Traps should be checked daily, it's inhumane otherwise.

William Lieberman

Fort Pierre SD

Position: support

Comment:

I fully support the requirement that traps be checked every 24 hours. Exceptions for severe weather or serious accident/illness should be included.

Dale Fisher

Palm Springs CA

Position: other

Comment:

Although I am not for this horrific trapping, 24 hours is better than 3 suffering days. These traps are cruel.

Chantik Chavez

Ontario CA

Position: oppose

Comment:

No comment text provided.

Susan Lefler

Austin TX

Position: other

Comment:

Trap check times are much too lax. Traps should be checked every hour to prevent unnecessary suffering. Anything longer is simply torture for the trapped animal. Every hour!!!

Wendy Blegen

Britton SD

Position: support

Comment:

Please require traps to be checked at least every 24 hours!

Jamie Campbell

Sioux Falls SD

Position: support

Comment:

I SUPPORT the 24 hour trap check times, but over all I wish it was banned. I find trapping to be very disgusting.

Lori Smith

Sioux Falls SD

Position: support

Comment:

I support the 24 hour trap check rule change.

Anyone against this should not be trapping. Be responsible. Be humane.

Debi Ulrey-Crosby

Brandon SD

Position: support

Comment:

Please stop this barbaric practice! You might think it's "our history" but it's cruelty at it simplistic level. If you are so cruel to use traps AT LEAST make it mandatory that these traps be checked more frequently. Even every 24 hrs isn't really soon enough to save some poor unsuspecting unintended animal. Suffering should not be allowed.

Rebecca Heisinger

Jackson WY

Position: support

Comment:

Trapping animals is in no way humane to any living sentient creature...however if we must torture animals with cruelty, the 24 hour law must be enforced.

Madonna Goodart

Rapid City SD

Position: support

Comment:

All mechanical trapping should be banned. Live traps must be checked at least every 24 hours. We are better than this. Leg hold traps are unbelievably cruel. No living thing deserves to die such a cruel death.

Mia Lancaster

New York NY

Position: other

Comment:

Traps should not be in existence ; however since they are it is requested that they be checked daily. Innocent pets and endangered species can die or mutilate quickly. Checking only every few days almost assures that the animal die or be permanently mutilated.

Charron Barnes

Trufant MN

Position: support

Comment:

No comment text provided.

Christy Rodgers

Spearfish SD

Position: support

Comment:

I support the 24 hour trap check rule change. Animals should not be left to suffer for days at the hands of people.

Sue Hayes

Deadwood SD

Position: support

Comment:

No comment text provided.

Stephanie Ellison

Huntington Beach CA

Position: support

Comment:

These traps should be banned all together! What a cruel and sick way to trap an animal! End these traps all together. If you allow them legally PLEASE REQUIRE THEM TO VE CHECKED EVERY 24 hours or less!

Misty Kuhnert

Brandon SD

Position: oppose

Comment:

Every 24 hours us needed

Christy Kellen

Sioux Falls SD

Position: oppose

Comment:

This should be every 24 hours not 2 or 3 days

Kasie Crisp

Colman SD

Position: support

Comment:

I think it should be mandatory that all traps should be monitored and checked at least twice a day. When animals are in the traps it causes unnecessary pain and harm. If the traps are checked twice a day that helps to ensure that any animal in the trap will not suffer for extended periods of time. Measures should be taken to make sure that there isn't any unnecessary suffering for any and all animals that encounter traps.

Amber Pontius

Spearfish SD

Position: support

Comment:

I fully support changing trap check times to 24 hours!!!!

Allen Harwood

Spearfish SD

Position: support

Comment:

No comment text provided.

Gail Harwood

Spearfish SD

Position: support

Comment:

No comment text provided.

Dennis Harwood

Spearfish SD

Position: support

Comment:

No comment text provided.

Travis Springer

Spearfish SD

Position: support

Comment:

No comment text provided.

Therese Pontius

Lead SD

Position: support

Comment:

No comment text provided.

Dave Pontius

Lead SD

Position: support

Comment:

No comment text provided.

Roxanne Berglund

Lead SD

Position: support

Comment:

No comment text provided.

Chad Berglund

Lead SD

Position: support

Comment:

No comment text provided.

Jerry Pontius

Deadwood SD

Position: support

Comment:

No comment text provided.

Wyatt Harwood

Spearfish SD

Position: support

Comment:

No comment text provided.

Seth Harwood

Spearfish SD

Position: support

Comment:

No comment text provided.

Sonja Vermillion

Sioux Falls SD

Position: support

Comment:

This whole trapping nonsense has got completely out of hand. We are supposed to be the superior species but we are showing with this type of behavior we are far from it. I do not agree with trapping at all and having traps only be checked every 2-3 days is ridiculous! Most in this state do not agree with trapping at all! Make this stop!

Paula Pillatzki

Labolt SD

Position: other

Comment:

Do not support trapping at all.

Heidi Madsen

Carpenter SD

Position: support

Comment:

I am asking for your support for the 24 hour trap check times. 2-3 days is too long and many animals suffer in traps including pets.

I would appreciate your support of 24 hour trap check time

Doneica Shapiro

Prescott AZ

Position: support

Comment:

24 hour track checks are absolutely mandatory! There is no need for creatures to suffer any longer than that; frankly, 2 minutes is too long. I wish traps didn't exist at all but this is a start.

Margarett Beverly

Rapid City SD

Position: support

Comment:

Please check traps daily

Kathy Grosz

Sioux Falls SD

Position: oppose

Comment:

If your family pet were to be trapped in this way, would this cruel outcome be acceptable to you? If your family pet were to be returned to you after it's life had ended in this way, would three days seem an appropriate time frame for them to suffer? No matter the animal or it's connection to human life, three days is cruel and inhumane. It's negligent behavior and as South Dakotans we have a responsibility to be RESPONSIBLE! Three days is ludicrous! Change this, change it because it's the right thing to do and these animals deserve better.

Shawna Lutz

Rapid City SD

Position: support

Comment:

Animals are needlessly suffering!

Charlotte Petrick

Rapid City SD

Position: support

Comment:

With the special interest cronyism initiated by Noem in 2019 (Nest Predator Bounty Program), more trapped animals than ever legally languish in the extreme heat, without water, for up to 72 hours before being clubbed or shot for the \$10 bounty on their tails.

72 hours is inhumanely too long for an animal to suffer, regardless of the season or temperature.

South Dakota used to be known as a sportsman's paradise. Sportsmanship includes ethics, and the will to end an animal's suffering as soon as possible.

I'm not against ethical trapping, I hunt & fish myself. I'm opposed to unnecessary cruelty to any animal. I'm opposed to my state continuing its downward spiral in ethics.

Natosha Mehrer

Lead SD

Position: support

Comment:

I support having the trappers check the traps more often. 3 days is too long! We quickly kill our livestock humanely. Why do we allow trappers to let wild animals suffer for days? It's sad and barbaric to let these animals starve, hurt, and possibly be attacked by other animals while stuck in the trap. Please think of the animals when you make your decision.

Tricia Rosatti

Minot SD

Position: oppose

Comment:

Make it LAW for NO TRAPPING!!!!

Denise Chappina

Killeen TX

Position: support

Comment:

72 hours is too long of a wait to check on traps that hold an innocent life. Could be longer due to "illness" or "weather". I know SD is a hunting state being an ex long time resident but trapping to not even eat is disgusting. The chances of catching protected species and throw aways (cats, dogs, etc. that lead to ferals by no fault of their own because people suck!) are very high! There has to be better options like TNR, etc. If you are so gung ho on putting out traps, then you need to be a responsible trapper. Not a big fan of using traps especially foot traps but all in all, this becomes a cruelty issue for these trapped animals to die horribly in them due to irresponsible trappers.

Amber Christians

Whitewood SD

Position: support

Comment:

Please shorten the amount of time required between checking traps, it's the only humane way.

Amanda Hofmann

Groton SD

Position: support

Comment:

Pets do not belong in traps. Please check the traps often. Could be someone's lost pet and won't survive longer than 24 hrs in a trap.

Courtney Huse-Wika

Spearfish SD

Position: support

Comment:

To not change this law is institutionalized animal cruelty. Do the right thing.

Teresa Hicks

Rapid City SD

Position: support

Comment:

One day of not checking a trap is too long! If trappers think they have to use these disgusting devices then they need to get off their lazy butt and check them daily. There is absolutely no way an animal should be left to suffer and die in this horrible way. Too many pets and innocent animals die in these stupid traps. And part of the reason for that is they are not checked on a daily basis. If you want to be involved in this so called sport then you need to be responsible enough to check your traps daily.

I was always under the impression that a sport is something in which both sides have a chance. Trapping is a vile and disgusting way to kill an animal and should be banned everywhere.

Brittany Moyer

Sioux Falls SD

Position: support

Comment:

No comment text provided.

Amber Beckham

Aberdeen SD

Position: support

Comment:

Make trapping illegal and this won't be an issue. Allowing for scared birds such as bald eagles and other animals to suffer is unethical and how is setting a trap that isn't required to be checked frequently hunting and legal?

James Marshall

Spearfish SD

Position: support

Comment:

Three days is too long for a trapped animal to suffer. Check them everyday and put them out of their misery.

Aaron Clem

Wentworth SD

Position: support

Comment:

It's our responsibility to be good stewards of the land and its animals.

Lori Linco

Rapid City SD

Position: support

Comment:

I definitely support the checking of the traps at least every 24 hours to protect innocent animals that come upon the barbaric devices.

Courtney Pierce

Spearfish SD

Position: oppose

Comment:

Please change the rules to make it mandatory to check every 24 hours to protect wildlife.

Else Van Otterloo

Sioux Falls SD

Position: support

Comment:

No comment text provided.

Surayni Calandra

Commack NY

Position: oppose

Comment:

Duplicate

Please stop this right now. This is inhuman and some of these animals are household pets. What examples are you setting forth for the future generations and this is going to continue destroy our ecosystem hence global warming. Everything you kill no matter what specie affects our ecosystem and affecting our ecosystem also affects the human population. You have no idea the damage you're causing. This is going to destroy the future of your children and your children's children. Ignorance is bliss.

Surayni Calandra

Commack NY

Position: oppose

Comment:

Please stop this right now. This is inhuman and some of these animals are household pets. What examples are you setting forth for the future generations and this is going to continue destroy our ecosystem hence global warming. Everything you kill no matter what specie affects our ecosystem and affecting our ecosystem also affects the human population. You have no idea the damage you're causing. This is going to destroy the future of your children and your children's children. Ignorance is bliss.

Surayni Calandra

Commack NY

Position: oppose

Comment:

Duplicate

Please stop this right now. This is inhuman and some of these animals are household pets. What examples are you setting forth for the future generations and this is going to continue destroy our ecosystem hence global warming. Everything you kill no matter what specie affects our ecosystem and affecting our ecosystem also affects the human population. You have no idea the damage you're causing. This is going to destroy the future of your children and your children's children. Ignorance is bliss.

Lindsey Keller

Milbank SD

Position: support

Comment:

No comment text provided.

Mayra Abogado

Sioux Falls SD

Position: support

Comment:

No comment text provided.

Rashel Olesen

Sioux Falls SD

Position: oppose

Comment:

I support the 24 hour trap check rule change.

Samantha Abbott

Spearfish SD

Position: support

Comment:

No comment text provided.

Rashel Olesen

Sioux Falls SD

Position: support

Comment:

I support the 24 hour trap check rule change.

Rosey Quinn

Hartford SD

Position: support

Comment:

I am not against trapping however the 24 hour check is vital to prevent unnecessary suffering of animals not intended to be trapped. It's the humane thing to do!

Chronic Wasting Disease

Kelly Peterson

Milbank SD

Position: oppose

Comment:

No comment text provided.

Eric Schoenfelder

Lake Andes SD

Position: oppose

Comment:

Very restrictive and hard to monitor. So what does the person suppose to do when they shoot a buck they want to European mount. It appears they are forced to locate and use a taxidermist from the infected county it was shot. Not allowing them to do the work on there own and in some instances driving well out of there way to drop it off if they are able to meet with the taxidermist. Then if they are hunting across the state they would have to return to pick up there deer. 90% of what is proposed cannot be properly enforced or monitored just like the AIS regs.

Nancy Hilding
President
Prairie Hills Audubon Society
P.O. Box 788
Black Hawk, SD 57718
August 26th, 2019
605-787-1248 (Skype phone)
nhilshat@rapidnet.com

SD Game, Fish & Parks
Joe Foss Building
523 Capital Ave.
Pierre, SD 57501

Attachments to our Comments on the SD Mountain Lion Plan Revision listed,

1. We include a suggested map of subset areas on the Prairie Unit
2. We include a letter we sent the GFP Commission on Washington State/Wielgus Research & the Black Hills
3. We include a spreadsheet of prairie unit mt. lion mortalities as of July.
4. Beier's 1993 Article - "Determining Minimum Habitat Areas and Habitat Corridors for Cougars"

Thanks,

A handwritten signature in black ink that reads "Nancy Hilding". The signature is written in a cursive style with a small flourish at the end.

Nancy Hilding
President
Prairie Hills Audubon Society

Nancy Hilding
President
Prairie Hills Audubon Society
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Pierre, SD 57501

Comments on the SD Mountain Lion Plan Revision,

General Topics

Prairie Lions

GFP's current goal is not to manage for having cougar populations on the prairie; you just manage for a sustainable population on the Black Hills. Thus the prairie SD has a 365-day season & unlimited "harvest". Hunting with hounds is allowed on prairie private land & also allowed starting on private land and moving onto some public lands by SDGFP. Hound hunting is much more effective than "boot hunting". We object to hound hunting, unlimited harvest & 365-day season everywhere on the prairie.

The most egregious problem with the Mountain Lion Plan Revision is the woeful inadequacy of the section on prairie lions, which is just 2 pages long on pages 76-78. Here and there in the rest of the text there are short references to prairie items, however these can be contradictory with facts. GFP needs to review all references to prairie lions to erase the claims that prairie lions are only dispersing males or there is no habitat in the prairie

There are almost 3 pages devoted to tribal coordination on page 57-59. We thank Kelly Hepler for appointing Ron Skates and thank GFP for at least having these 3 pages.

We believe in the Tribal section you should discuss hunting rights secured to Native Americans by treaties and the legal rationale that GFP uses to argue that those hunting rights were lost and USA should no longer honor them. I think the hunting/fishing rights issue was not raised by Tribal Plaintiffs in the Supreme Court litigation over the loss of the Black Hills, for which the Supreme Court awarded the Lakota money, which the Lakota continue to refuse.

Article V of the 1851 Treaty provided in pertinent part:

It is, however, understood that, in making this recognition and acknowledgement, the aforesaid Indian nations do not hereby abandon or prejudice any rights or claims they may have to other lands; and further, that they do not surrender the privilege of hunting, fishing, or passing over any of the tracts of country heretofore described. (Emphasis added)

Article 17 of the 1868 Treaty provided:

'It is hereby expressly understood and agreed by and between the respective parties to this treaty that the execution of this treaty and its ratification by the United States Senate shall have the effect, and shall be construed as abrogating and annulling all treaties and agreements heretofore entered into between the respective parties hereto, so far as such treaties and agreements obligate the United States to furnish and provide money, clothing, or other articles of property to such Indians and bands of Indians as become parties to this treaty, but no further.' (Emphasis added)

We believe the document is woefully inadequate because of the prairie section and a prairie unit supplement is needed. In part this requires you to talk to tribes to gather their mountain lion data. We question if your mortality data is complete on the prairie, due to insufficient communications with tribes. We don't think tribes, especially Oglala Sioux Tribe have population estimates, however some of them have some idea of where resident lions may be living. However you may need to give grants to the tribes to do cougar surveys and to do research on tribal land to develop missing data on their lions (but only if they should be willing to receive such grants/resources and/or coordinate such activities with you). However the tribes should be able to provide you with maps of their suitable habitat.

It is our belief that there is evidence of a female kitten under 1 year of age found in a live trap on Oglala Sioux Tribe (OST) lands in January of 2015, near Kyle, that was moved about 10 miles north of site she was found at. We believe at least one road kill kitten, likely aged less than one year old, has been found on OST lands. You discuss 3 females who were lactating or had proof of lactation on OST lands and Bennett County and 1 female with lactation history in Mellette County, near the boundary with Todd County.

You need to provide more information on the prairie's lactating females: 1.) Where were they found in those counties? 2.) Was lactation current? 3.) Was there a search for kittens? & 4.) How were they killed? You need to provide more information on the dead kittens recorded by SD GFP's mortality database in non-tribal jurisdictions in the prairie unit; there have been 2 kitten deaths recorded. You need to evaluate the Cheyenne River leaving the Black Hills as possible high-level habitat & notice the dead females & dead kitten found near it.

Bennett County was once part of the Pine Ridge Reservation, Mellette, Gregory, Tripp & part of Lyman Counties were once part of Rosebud Sioux Tribe Reservation till federal court rulings modified reservation boundaries.

The Prairie Unit contains Pine Ridge Ecosystem, which is in three states: Wyoming, Nebraska and SD. Now you have breeding documented in SD portion of the Pine Ridge. Oglala Sioux Tribe has a 2019 hunting harvest limit of 20 lions, with a female sub limit of 10. If that limit was actually achieved, perhaps hunting would obliterate all lions down there, but it certainly is overly aggressive hunting limit. So how do Wielgus theories relate to a 20/10 lion harvest limit in the Pine Ridge, when their objective/goal (as explained to me), seems to be to drive lions away from populated areas, but not to actually obliterate the lion population?

Washington State researchers did extensive research and proved that Washington State's aggressive recreational hunting of cougars did not bring about the expected/anticipated results due to the increase in younger male lions in the lion population. After all this research, Washington State believes in an "equilibrium hunt"; a 14% kill of adult/sub-adult is the appropriate hunting strategy. As a result the State of Washington has created 49 cougar hunting units, and if the kill in any unit exceeds 16% of the adult females, sub-adult females, adult males or sub-adult males, the hunt in that unit is closed. Video on Wielgus and Washington State research can be found at this link: https://www.youtube.com/watch?v=2_ZD-PAKhSo

John Kanta does not believe that these Washington State theories apply to the Black Hills, if so Wielgus/Washington State theories need to be discussed & challenged for the Black Hills in the Revised Plan. But we also ask - do they apply to Oglala Sioux Tribe or Rosebud Sioux Tribes whose resident lion populations are small & are close to both Nebraska's Pine Ridge & Niobrara populations & Black Hills? In other words is the capacity to support cougars on the biologically suitable habitat on Oglala Sioux Tribe, Rosebud Sioux or Yankton Tribe lands small relative to the immigration rate from nearby source populations & thus do some of Wielgus's theories apply on some of SD's Reservations?

You need to talk to the wildlife biologists at all tribes responsible for mountain lions and record their reports on their lion populations and lion management goals and issues in the Draft Revision. We have heard possible evidence of breeding at Oglala, Rosebud & Yankton and evidence of resident lions at Cheyenne River. With changes in wildlife staff, past knowledge can be lost. Reservations were allotted and the areas around Reservations can have checkerboard ownership patterns. Due to intermixed jurisdictions, the tribal knowledge and goals needs to be included in the Plan.

We support the breaking up of the Prairie unit into subsets to allow for management of areas with biologically suitable habitat in a different way than biologically unsuitable habitat. If an area has the potential to support some breeding cougars, that opportunity needs to be identified and the area needs its own boundaries. Also connectivity corridors may need to be protected. You don't necessary need to always manage them differently from the rest of the prairie, but if you identify them, you have an option to do so during hunting season's biennial rule making.

We will attach a map with some suggested subset areas. But we believe reservations should be prairie unit subsets, but especially the reservations of Cheyenne River, Oglala, Rosebud and Yankton need to be sub-set units. While we believe you need to consult with and cooperate with tribal government, their goals can change with elections, new leaders, new data, changing biological conditions or changes in public opinion, so the management goals identified by tribes and/or GFP, in any year can change in the future. What you need to do is create prairie subset areas for them, where at any point of time, you and tribes may agree to set different goals than in the rest of the prairie (or not). We suggest Custer National Forest Area needs a subset, as does the lower Missouri River Breaks. We suggest you need a buffer zone subset(s) around the Black Hills Fire Protection District, but especially when hogback habitat is outside the

District.

Lions in Cities or Suburban Areas

Please go into more depth on your policies to remove lions found in urban or suburban areas, when lions are guilty of no threatening or aggressive action, except to be guilty of being found in the wrong place and people being afraid. We find your actions sometimes bizarre, for example the cougar hiding in the dirt cave in Wall. We hope you will think of translocation for some of those "innocent" cougars.

Depredations

You provide a chart of the lions killed for the sake of depredations relief, however the dead lions did not necessarily engage in depredations -- included in that chart are lions killed because folks feared they would depredate. Please differentiate between "conflict" lions who actually depredated and those "conflict" lions some one was merely afraid of.

Please also provide the exact number of livestock or pets that were depredated. This depredation is a main reason for the aggressive hunting on the prairie, however as we remember the discussion at Commission meeting Pierre in January 2015 about the prairie unit's depredation history, that occurred during the hound hunting finalization, some staff folks thought there was no record of prairie livestock depredations, but a staff member alleged there had been a few and if I remember correctly, they might have been pet depredations. Please very clearly explain confirmed domestic animal depredations in the prairie unit, please list confirmed lion kills and the years and locations. We don't mean events when people were afraid after seeing/hearing lions near the yard, the barn or house, but actual kills of livestock or pets by lions.

Please also specify very clearly the confirmed kills in the Black Hills, and what year, location and animal killed. We believe only confirmed kills have been hobby livestock or pets & not many of those. In the text somewhere in the discussion of contents of lion stomachs, it indicates 1% of stomach contents was beef. This 1% rate does not seem to match the SD beef depredation records in SD given the number of lions we have.

We strongly suspect the depredation issue is based on mythic fear.

People Attacks

Please clearly explain the history of attacks on people in the State, We believe no one has been killed, but there have been 2 alleged "attacks", that left "victims" with very little or no harm & one was not really verified. Please review the nationwide cougar kill record statistics and compare to other risks from animals, like number of persons killed by mosquitoes, dogs, deer collisions, cattle vs. those killed by cougars. There have been 27 deaths due to cougars in North America since 1890 -

https://en.wikipedia.org/wiki/List_of_fatal_cougar_attacks_in_North_America

Public Education

Please explain SDGFGP's attempts to teach people about their own and their animals risk from cougars. Please offer resources to the Tribes to have some public education meetings on cougars, that in addition to biology and behavior info, includes realistic discussions of risks and disclose the SD and national actual attack statistics not the myths and that train people how to act during cougar encounters.

Values:

One of the objectives of the Plan is: " Manage mountain lion populations for both maximum and quality recreational hunting opportunities, considering all social and biological inputs." (See page xi). We believe this prioritization of hunter wishes, is unbalanced. We believe the number of hunter advocates vs. not hunter advocates invited to the October stakeholder meeting, clearly displayed SD GFP bias towards hunting and hunters. Mountain lions have important ecological roles and USFWS shows that wildlife watching is much more popular than hunting; Total wildlife watchers are: 86.million vs. total big game hunters are: 9.2 million. (2016 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation: National Overview --

https://wsfrprograms.fws.gov/subpages/nationalsurvey/national_survey.htm).

People who live in the Hills come up to me and tell me of their delight at having a mountain lion walk on their property or in their area. They proudly show me photos of their lions. Not all folks in the Hills are afraid of lions or want to kill them. Some are wildlife watchers and wildlife advocates. The Plan should discuss creating a way for wildlife watchers or wildlife enthusiasts to donate to SD GFP lion management efforts, as to a certain extent GFP is funded by dollars

earned from hunting/fishing licenses or Pitman-Robertson.

SDGFP seems to believe that when hunters pay these fees/taxes it is like voluntary donations, and this creates an imbalance in relative influence of interest groups. However Pitman-Robertson with its taxes on hand guns, rifles and ammunition, is not just supported by hunters, but also by folks who use guns for not hunting purpose. The wildlife belongs to all citizens of the state (including card carrying PETA members) & hunters pay for the privilege to hunt this publicly owned resource at below market value for meat or furs. They aren't giving donations.

Prairie Hills Audubon Society (PHAS) strongly objects to hunting any native predator in order to maximize the number of prey species such as deer/elk/pheasants, that human hunters want to kill. We don't believe that the wildlife exists just for human predators to execute. Mountain lions have important ecological roles and they have a right to kill prey. We believe that the fluctuations in popular prey species numbers are more dependent on other factors like the weather. We hope SDGFP explains that in the Plan.

We don't think the Plan disclosed well enough the history of many hunters advocating that SDGFP increase harvest limits to insure mountain lions killed less deer, elks, mountain goats and/or rocky mountain sheep. We believe that historic lobbying was a very significant factor in the increase of the "harvest limit". (We were there). As you may realize from the Nest Predator Bounty fiasco, not all SD citizens like you killing native predators to maximize prey available for hunters to kill. We hope you make this historic lobbying by a stakeholder group (ungulate hunters) & their powerful influence on you, more transparent.

Cougar Population Goals

The status quo allows for overly aggressive hunting of cougars both in the Black Hills and in the Prairie. We object to the high harvest rates. We question SD GFP 2017-2018 estimates of the cougar population numbers in the Black Hills, as confidence intervals are too large. We believe this is because not enough cougars that were darted were later killed. The SDGFP 2017-18 annual cougar population estimate is not believable due to inadequate field data collected. We hope you calculate & include the 2018-2019 data before giving to the Commission. We read your entire Plan and some of the facts and research results seem to contradict. We are not sure of the reliability of your population estimates and how many lions there really are.

A stable mountain lion population requires about 12-14% "human killing" of the adult/sub-adult population. PHAS supports management of the Black Hills area, as a "source" population to help recolonize eastern areas with cougars. To manage the overall area as a "source" population SDGFP needs "human killing" below 12% of estimated adult/sub-adult lion population.

SD GFP should clearly provide charts for all years since 2005, where you explain the number of male, female adults and sub-adults and the number of kittens. We need a chart with these numbers (not a graph of all ages of lions) so we can calculate what percent of the adult/sub-adult population the harvests have killed and evaluate the sink, source, stable quality of the harvest. All graphs & charts should go back to 2005, when hunting began. The 2005 population numbers are referenced in text & thus we need to see what they were. Why did you leave the first few years of the harvest off the charts and graphs?

The bar chart on Figure 13 shows the Wyoming and SD populations against increasing, stable and decreasing thresholds. SD GFP should provide us with the km² values used by both states to calculate that bar chart. Wyoming's lion habitat area values have increased in size with time, as they get better data. This means at first they were dividing by too small a number. SD GFP should clearly explain the theories & data sets Wyoming uses to generate their share of the bar chart & juxtapose the theories & data sets SD uses to estimate their bars within the chart. As far as we know you all use different data & calculate via different theories/models.

SD GFP give Fescke's km² value for Black Hills area & high quality habitat. Fescke's Black Hills area refers to Wyoming & SD and her high quality habitat value just refers to Forest Service lands (excluding other state, federal & private lands). Please explain the area value you use for the Black Hills Fire Protection District.

The SD GFP plans to manage for population of 200-300 lions of all ages, it is not really clear why you picked this number - except it fulfills value objectives, but it seems to be a "decreasing" population or "sink" objective (compare Plan's Figures 13 and 15). Managing the Black Hills as a "sink" is also Wyoming's objective for the Black Hills.

Mountain lion populations are self-regulated and don't over populate. There is proof in some states in the USA, that aggressive hunting seasons replace

experienced adult lions with inexperienced, younger lions who get into conflict with humans more and replacement males may engage in more cougar infanticide. We have asked before in this letter that you discuss the Wielgus/Washington State theories and why you all don't believe they apply to the Black Hills.

As SD has not reached the harvest limit in years and the yearly take of lions keeps dropping, we believe the harvest limit is a joke and it is the season length that determines or limits the harvest, not the official "harvest limit".

Subsets in the Black Hills

We believe that the Black Hills Fire Protection District should be broken up into more subsets than just Custer State Park and everywhere else. We object to hunting in Custer State Park, as Parks should be for wildlife watchers, not hunters. We believe that Wyoming is managing the Black Hills as a more aggressive sink than SD and we suspect that Wyoming is sucking out SD lions to keep their aggressive harvests supplied. As they use hounds, they are more likely to reach their quotas. We request a lion sanctuary area in the Black Hills, in addition to the federal Parks.

Other comments:

The cost of a mountain lion hunting license needs to be greater than \$28. The incidental take of mountain lions by traps and snares should be counted against the "harvest limit" for hunting each year.

Thanks,



Nancy Hilding
President
Prairie Hills Audubon Society

Causes of Mountain Lion (Puma concolor) Mortality in South Dakota (1996-2017)



Hunter harvest



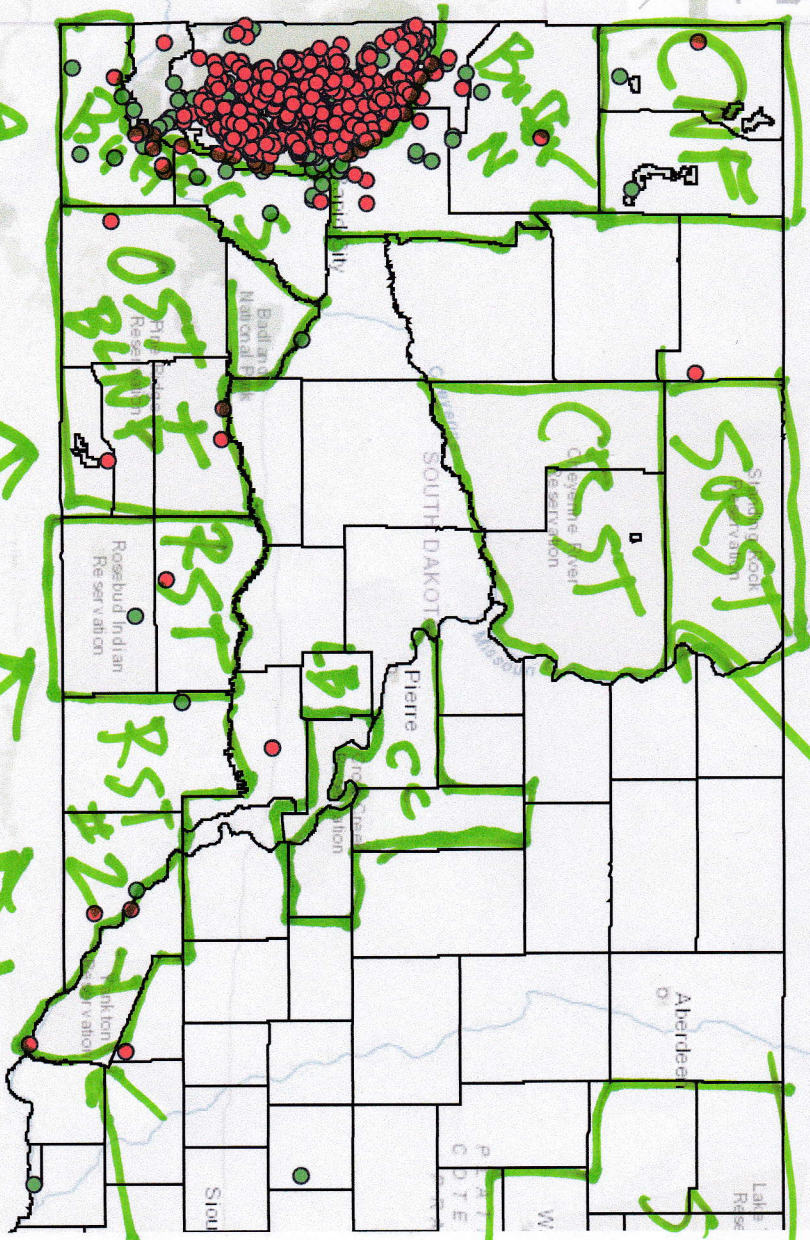
Public removal



Deer Hunting Units (2014)



ecotone buffer



ecotone buffer

Rock stands
CNF sub sd
wild
meadow

ecotone buffer

ecotone buffer

Yankton

Wichita
25515



MOUNTAIN LION FOUNDATION

Saving America's Lion

August 30, 2019

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Lynn Cullens

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Robert Wagner

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Tony Leif, Wildlife Division Director
South Dakota Game, Fish and Parks
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Email: Gary.Jensen@state.sd.us

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

Dear Chairman Jensen, Members of the Wildlife Board, and Director Leif,

The Mountain Lion Foundation respectfully requests that you make substantial changes to the South Dakota 2019-2029 Mountain Lion Management Plan that is currently in draft. While we appreciate the efforts of South Dakota Game, Fish and Parks (SDGFP) to update the management plan for mountain lions, we want to be certain that valid and reliable science is guiding the plan.

The concerns expressed below are the official position of the Mountain Lion Foundation as we represent our 7000 supporters nationwide.

The draft plan is based on invalid assumptions that mountain lion populations in South Dakota require human intervention in order to control lion expansion and mitigate conflict.

Except in rare instance, mountain lion populations do not require management to control growth, because their populations are self-regulating based on the abundance of prey and the carrying capacity of the land to support prey populations.

Mountain lions occur at low densities relative to their primary prey (Stoner et al. 2006). In order to survive, mountain lions must increase or decrease the sizes of their territories relative to prey populations (Wallach et al. 2015). Lions kill other lions to defend territorial boundaries, or starve without a territory sufficient to meet their needs.

In other words, when prey populations decline, so do mountain lion populations. Because of these predator-prey dynamics, mountain lion populations do not need to be managed by humans.

And recreational hunting is the wrong tool for addressing conflicts, because hunting targets the wrong lions.

Trophy hunting targets large adult lions with established territories and habits. Those lions are not only the least likely to come into repeated conflicts with humans, but their stable presence reduces the number of young dispersing lions most likely to enter human-occupied areas and to attack domestic animals.

30
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Saving America's Lion
1986 ~ 2016

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Recent science has demonstrated that because hunting results in a younger overall age structure, hunting pressure can predictably increase the number of conflicts with humans and domestic animals (Creel and Rotella 2010, Ausband et al. 2015, Darimont et al. 2015, Cooley et al. 2009).

A study in Washington State showed that, as wildlife officials increased quotas and lengthened hunting seasons, mountain lion complaints increased rather than decreased. The heavy hunting pressure resulted in a higher ratio of younger males in the population as a result of immigration and emigration (Tiechman et al. 2016). Contrary to popular belief, hunting mountain lions results in an increase in complaints and livestock depredation due to disruption of their social structure, and increased immigration of young dispersing lions (Tiechman et al. 2016, Peeble et al. 2013).

Conflicts with mountain lions are exceedingly rare, and coexistence is possible.

Throughout the West, people have learned to live alongside lion populations with little conflict. The same could be true in South Dakota if the state were to make a more concerted effort to bring valid biological and behavioral information about mountain lions to the attention of the public. With such additional understanding, the public will recognize that conflicts with mountain lions are exceedingly rare, easily resolved, and that the value of mountain lions is significant.

When conflict does occur, intervention can occur at the level of a specific lion, rather than at the population level, for more cost-effective and biologically sustainable conflict resolution. It makes much more sense to assess what might be done to limit the behavior of particular lions when and where a conflict happens, rather than to try to control entire populations in the vain hope that the unwanted behaviors of specific lions will be limited.

When one looks beyond simple counts of mountain lions, it becomes clear that a scientific assessment of the stability of subpopulations, age and sex ratios, and health and stability of breeding populations is essential. A rise in numbers alone might be indicative that stable breeding populations have been disrupted and replaced by unsustainable numbers of young dispersing lions fighting over territory and likely to create conflicts. Counterintuitively, if hunting were to cease, social structures and population size might stabilize and conflicts become less common.

Recreational hunting of mountain lions results in additive and unsustainable mortality and a high risk of potential extirpation for the mountain lions of South Dakota.

Even though it is an ineffective tool, trophy hunting is unfortunately the greatest source of mortality for mountain lions throughout the majority of their range in the United States (WildFutures 2005). Hunting mountain lions results in additive mortality – rates that far exceed what would happen in nature – and can lead to population instability and decline (Vucetich et al. 2005, Eberhardt et al. 2007, Darimont et al. 2015).

In order to sustain viable populations of mountain lions, prevent human-wildlife conflict, and avoid compromising the long-term viability by failing to account for all human-caused sources of mortality, hunting of adult lion populations should not exceed the intrinsic growth rate of the population of interest (Beausoleil et al. 2013).

The intrinsic growth rate for mountain lion populations is established by researchers to be between 15-17% (Robinson and DeSimone 2011). Assuring that human-caused mortality is limited to well below this threshold facilitates the maintenance of home ranges and social stability, reducing the likelihood of increased conflict with humans and population decline (Maletzke et al. 2014).

Additionally, trophy hunting of mountain lions leads to an increase in kitten mortality in heavily hunted populations (Stoner et al. 2006, Wielgus et al. 2013). Killing an adult female with kittens results in the death of her dependent young by dehydration, malnutrition, predation and exposure;

even those who are at least six months to a year old (Stoner et al. 2006). This impacts a population's ability to recruit new members if too many adult females are removed, making the population less resilient to hunting and other causes of mortality, both human-caused and natural (Anderson and Lindzey 2005).

The previous quota far exceeds the sustainable threshold of 12-14% for **total** anthropogenic (human-caused) loss within a population that is widely accepted by western state agencies and the majority of mountain lion researchers (Beausoleil et al. 2013). In terms of this threshold, the word sustainable means that should anthropogenic mortality exceed the threshold over time, populations will decrease, and eventually extirpation will occur. As this management plan will remain in effect for a decade, and because lion populations in South Dakota are so low, any error in determining the likely percentage of anthropogenic mortality has potentially dire consequences.

SDGFP currently estimates that there are anywhere from 111 to 970 mountain lions. Managing lions through the use of trophy hunting with a population that is potentially as small as 111 individuals is gambling with the future of lions in South Dakota. If the actual mountain lion population falls along the lower end of the confidence interval, then the previous quotas of 60 hunting permits would represent a 54% loss to the population, exceeding the 12-14% threshold set by experts by more than 40%.

Although suitable habitat exists for mountain lions in the prairies of South Dakota, the hunting of mountain lions outside of the Black Hills is unlimited in quota and season length. The quota setting has failed to consider that uncontrolled killing outside of the hunting zones can increase lion mortality substantially.

The agency has also failed to consider other forms of anthropogenic mortality, including vehicle strikes, incidental snaring or trapping, poisoning, poaching, and public safety removal which all must be included in order to effectively stay below the extirpation threshold.

Using hounds to pursue mountain lions is unethical and is not considered to be fair chase.

Hounding is an inhumane and outdated sport that has been banned in two-thirds of the United States. Hounding poses significant risk to the hounds as well as to young wildlife, including dependent kittens and cubs, who may be attacked and killed by hounds (Lindzey et al. 1992, Logan and Sweanor 2001, Elbroch et al. 2013). Hounds also disturb or kill non-target wildlife and trespass onto private lands (Hristienko and McDonald 2007). This practice is not fair chase and is highly controversial, even among hunters (Posewitz 1994, Teel et al. 2002, WildFutures 2005).

Fair chase hunting is based upon the premise of giving the animal an equal opportunity to escape from the hunter (Posewitz 1994). Using hounds, especially those equipped with GPS collars, provides an unfair advantage to hunters.

Many proponents of hound hunting claim that hunters can be more selective using this technique. Since hunters can get so close to a treed animal, hound hunting advocates assert that hunters can determine the sex, size, and general age of an animal before determining whether or not they are permitted to harvest that individual. Knowing the sex and other demographic status of the individual being hunted could be helpful in maintaining a viable population. However, a review of 30 years of records from game managers throughout the western United States found that, although technically feasible, most hunters could not tell the size and sex of an animal up a tree. Hunters had roughly 50% accuracy when determining sex; the same as if they had determined the sex with a coin toss.

We recognize that there is pressure to reduce mountain lion populations in order to satisfy deer hunters that they will not be competing with mountain lions for deer, and note that reduction

of mountain lion populations will not increase ungulate populations unless lion populations are decreased unsustainably.

Hunting mountain lions has long been thought to bolster populations of game species like mule deer, while reducing competition for this shared resource.

On the East Coast of the United States, it has become clear that when mountain lions are extirpated entirely, deer populations do increase. However, it is not true that simply decreasing the number of mountain lions relative to deer populations will cause deer populations to increase or remain healthy over the long term. Mountain lions and deer have co-evolved to create a natural balance. Suitable available habitat will continue to determine deer numbers (even given limited long-term impacts from mountain lions), and lion numbers will fluctuate in response, unless mountain lions are nearly extirpated.

In other words, an agency cannot adjust prey numbers by reducing predators without risking extirpation of the predator population.

A recent study evaluated the impacts that heavy hunting of mountain lion has on mule deer and elk. The study found that heavy hunting pressure on these apex predators had the opposite effect on mule deer (Elbroch and Quigley 2019). As trophy hunters often target the large, dominant male, they inadvertently reduce the age structure of mountain lions in the area, leaving younger, less experienced lions on the landscape. According to the study, these younger predators typically selected for mule deer instead of larger prey species like elk. As a result, the researchers noted that, despite increased survival of fawns and females, the removal of mountain lions did not yield a growth in the mule deer population. Instead, they suggested that hunting may actually be increasing the number of mountain lions that specialize in targeting deer.

Killing mountain lion kittens dependent upon nursing mothers is not acceptable to most South Dakotans. However, current hunting rules make orphaning very common.

While it is not permitted in South Dakota to kill any females accompanied by spotted kittens, dependent young may not always be in the presence of their mother, and spotted kittens have been taken by hunters in the state. Without kittens in her presence, a hunter may not be aware that a female has offspring and may kill her. As mountain lions offspring are dependent on their mothers for survival up to around 18 months of age, the loss of their mother prior to reaching adulthood would likely result in the death of her young, even if they are around a year old.

A recent study has shown that delaying the start of hunting seasons until December 1 would protect about 91 percent of kittens from perishing as a result of being orphaned by hunters (O'Malley et al. 2018). By better aligning any hunting seasons with denning periods, hunters will have the best opportunity to identify females with kittens. This, ultimately, will benefit both mountain lions and hunters that want to ensure that their populations remain healthy into the future.

While we appreciate that the Department took this date into account for the hunting of mountain lions in the Black Hills Unit, this is not the case in other areas of the state. Landowners on their own land do not count toward the quota outside of the season dates for the Black Hills Hunting Unit.

Based on the information above, the Mountain Lion Foundation respectfully requests that:

- **The Department provide a comprehensive annual assessment of anthropogenic mortality in South Dakota, readily available to the public in a timely manner and well in advance of proposed changes to lion policy.**

There is substantial and generally unavoidable human-caused mortality of mountain lions due to vehicle strike, incidental snaring or trapping, poaching, hunting on tribal lands, conflicts with domestic animals, public safety removal and other causes which have not been quantified in the draft plan. Because these numbers contribute the threshold for sustaining a mountain lion population without risk of extirpation, the Department and Commission should err on the side of caution to maintain the small breeding population of lions in South Dakota.

This will require that the Department assess anthropogenic mortality more effectively, and make these numbers available for public scrutiny on a timely annual basis.

- **South Dakota suspend mountain lion hunting entirely, given the relatively small amount of available habitat in the state, high anthropogenic mortality, and the value of mountain lions to South Dakotans and to recolonization of eastern states.**
- **Restrict killing of mountain lions in all parts of the state to department issued permits or actions targeting individual lions in specific situations where it will demonstrably and effectively resolve a serious conflict.**
- **Hold multi-state discussions with other neighboring state agencies so that lions may recover in their historic ranges.**
- **If suspension of hunting is rejected, we ask that at a bare minimum the Department and Commission reconsider quotas annually and reduce quotas to below the 12% sustainable limit, less the full tally of annual anthropogenic mortality described above.**
- **Delay the start of all mountain lion hunting seasons in *all* areas until December 1 to protect dependent kittens from being orphaned by hunters, and that killing of mountain lions throughout the remainder of the state be similarly restricted to reduce orphaning.**
- **Eliminate the use of hounds to pursue mountain lions as a socially disruptive, inhumane and unethical practice.**
- **If the Commission decides to continue to allow the use of dogs then, at the very least, GPS collars should be prohibited as the practice does not align with fair chase values.**

Thank you for your consideration. Please make this comment letter a part of the official record regarding this decision.

Respectfully,


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REFERENCES

- Anderson, C. R., and F. G. Lindzey. 2005. **Experimental evaluation of population trend and harvest composition in a Wyoming cougar population.** *Wildlife Society Bulletin* 33:179–188.
- Ausband, D. E., C. R. Stansbury, J. L. Stenglein, J. L. Struthers, and L. P. Waits. 2015. **Recruitment in a social carnivore before and after harvest.** *Animal Conservation* 18:415–423.
- Batavia, C., M. P. Nelson, C. T. Darimont, P. C. Paquet, W. J. Ripple, and A. D. Wallach. 2018. **The elephant (head) in the room: A critical look at trophy hunting.** *Conservation Letters*.
- 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*.
- Cooley, H. S., R. B. Wielgus, G. M. Koehler, H. S. Robinson, and B. T. Maletzke. 2009. **Does hunting regulate cougar populations? A test of the compensatory mortality hypothesis.** *Ecology* 90:2913–2921.
- WildFutures. 2005. **Cougar Management Guidelines.** WildFutures, Bainbridge Island, WA.
- Creel, S., and J. J. Rotella. 2010. **Meta-Analysis of Relationships between Human Offtake, Total Mortality and Population Dynamics of Gray Wolves (*Canis lupus*).** *PLoS ONE* 5.
- Darimont, C. T., C. H. Fox, H. M. Bryan, and T. E. Reimchen. 2015. **The unique ecology of human predators.** *Science*. 349:858-860.
- Eberhardt, L. L., P. J. White, R. A. Garrott, and D. B. Houston. 2007. **A Seventy-Year History of Trends in Yellowstone’s Northern Elk Herd.** *Journal of Wildlife Management* 71:594–602.
- Elbroch, L. M., and H. Quigley. 2019. **Age-specific foraging strategies among pumas, and its implications for aiding ungulate populations through carnivore control.** *Conservation Science and Practice* 1.
- Elbroch, L. M., B. D. Jansen, M. M. Grigione, R. J. Sarno, and H. U. Wittmer. 2013. **Trailing hounds vs foot snares: comparing injuries to pumas *Puma concolor* captured in Chilean Patagonia.** *Wildlife Biology* 19:210-216.
- Hristienko, H., and J. McDonald, John E. 2007. **Going in the 21st century: a perspective on trends and controversies in the management of the black bear *Ursus*.** 18:72-88.
- Larue, M. A., C. K. Nielsen, and B. S. Pease. 2019. **Increases in Midwestern cougars despite harvest in a source population.** *Journal of Wildlife Management* 83(6):1306-1313.
- Lindzey, F. G., W. D. Vansickle, S. P. Laing, and C. S. Mecham. 1992. **Cougar Population Response to Manipulation in Southern Utah.** *Wildlife Society Bulletin* 20:224-227.
- Logan, K. A., and L. L. Swenar. 2001. **Desert puma: evolutionary ecology and conservation of an enduring carnivore.** Island Press, Washington, DC.
- Maletzke, B. T., R. Wielgus, G. M. Koehler, M. Swanson, H. Cooley, and J. R. Alldredge. 2014. **Effects of hunting on cougar spatial organization.** *Ecology and Evolution*.
- O’Malley, C., L. M. Elbroch, A. Kusler, M. Peziol, and H. Quigley. 2018. **Aligning mountain lion hunting seasons to mitigate orphaning dependent kittens.** *Wildlife Society Bulletin* 42:438–443.
- Peebles, K. A., R. B. Wielgus, B. T. Maletzke, and M. E. Swanson. 2013. **Effects of Remedial Sport Hunting on Cougar Complaints and Livestock Depredations.** *PLoS ONE* 8.

- Posewitz, J. 1994. **Beyond Fair Chase: The Ethic and Tradition of Hunting**. Falcon Press, Helena, Montana.
- 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.
- South Dakota Game Fish and Parks [SDGFP]. 2019. **Draft South Dakota Mountain Lion Management Plan 2019-2029**. <https://gfp.sd.gov/userdocs/docs/LionPlan_FINAL_DRAFT_JULY_25.pdf>. Accessed 21 August 2019.
- South Dakota Game Fish and Parks [SDGFP]. 2018. **South Dakota Survey Report Mountain Lion Population Status Update 2017 Biennial Report**. <<https://gfp.sd.gov/userdocs/docs/2017-status-report.pdf>>. Accessed 20 August 2019.
- South Dakota Game Fish and Parks [SDGFP]. 2010. **South Dakota Mountain Lion Management Plan 2010-2015**. <<https://www.nrc.gov/docs/ML1224/ML12241A406.pdf>>. Accessed 20 August 2019.
- Stoner, D. C., M. L. Wolfe, and D. M. Choate. 2006. **Cougar Exploitation Levels in Utah: Implications for Demographic Structure, Population Recovery, and Metapopulation Dynamics**. *Journal of Wildlife Management* 70:1588–1600.
- Teel, T. L., R. S. Krannich, and R. H. Schmidt. 2002. **Utah stakeholders' attitudes toward selected cougar and black bear management practices**. *Wildlife Society Bulletin* 30:2-15.
- Teichman, K. J., B. Cristescu, and C. T. Darimont. 2016. **Hunting as a management tool? Cougar-human conflict is positively related to trophy hunting**. *BMC Ecology* 16.
- Vucetich, J. A., D. W. Smith, and D. R. Stahler. 2005. **Influence of harvest, climate and wolf predation on Yellowstone elk, 1961-2004**. *Oikos* 111:259–270.
- Wallach, A. D., I. Izhaki, J. D. Toms, W. J. Ripple, and U. Shanas. 2015. **What is an apex predator?** *Oikos* 124:1453–1461.
- Wielgus, R. B., D. E. Morrison, H. S. Cooley, and B. Maletzke. 2013. **Effects of male trophy hunting on female carnivore population growth and persistence**. *Biological Conservation* 167:69–75.