

# Public Comments - May 6 to June 2, 2024

## Elk

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**Paul Lepisto**

Attachment #12600

**Pierre SD**

**Position:** oppose

**Comment:**

Please see attached comment letter from the SD Division of Izaak Walton League of America.

## Other

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**Benjamin Brown**

**Pierre SD**

**Position:** other

**Comment:**

Has there been any thought of having the Black Hills Spring Turkey season be a limited draw for residents and nonresidents? Or just nonresidents at a minimum?

I've been hunting turkeys in the Hills since 1999 and have seen many changes over the years. The highs and lows of the turkey populations. The change of the use of rifles to shotgun only. The limit to one tag and no longer being able to get a second tag after May 1st. To the most recent changes of pushing opening day of the Hills season to the fourth weekend in April. (As well as pushing archery season back to the opening of the shotgun seasons.) There has been an increase in popularity of hunting in the Hills mainly because of social media (YouTube, Facebook, etc.). With the abundance public land and unlimited tags for all, I can't say I blame them for coming to our great state.

The last few years there has been more and more hunters, in particular more nonresidents. It has become very apparent that the supply and demand is getting out of control. Last weekend I was hunting turkeys with family and friends in the Hills, but the amount of hunters is unbelievable. One particular area we hunt had 11 vehicles all of which were nonresidents... Another area had 7 vehicles with one South Dakota license plate. This went on and on everywhere we went with a total of 47 out of state vehicles and 4 resident vehicles in one weekend in a rather small area. There definitely was not enough toms for the amount of tags. It seems to get worse every year.

Please consider making the Black Hills Spring Turkey season a limited draw.

Thank you for your time.

Benjamin Brown

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**Jim Hagen**

**Britton SD**

**Position:** support

**Comment:**

Time to change the law, outdated, can't hold pkc or ukc licensed coonhunting events, common sense tells us to allow out of state hunters to participate, year around as hunts are held most months, weather permitting, thank you

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**Jeff Poschwatta**

**Kent WA**

**Position:** support

**Comment:**

I support the preservation of Custer State Park Airport, 3V0 as I am an airplane camper. I have been to this airstrip and it is much needed as an access point to the park. I support the Recreational Aviation Foundation.

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**Leisa Bailey**

**Vermillion SD**

**Position:** oppose

**Comment:**

I am against the Rule Proposal/Finalization to allow for out-of State hunters to use hounds to hunt raccoons to facilitate large raccoon hound hunting events here in South Dakota. I oppose collective hound hunting of small animals as a recreational sport in our State of South Dakota.

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**Carey Smalley**

**Pierre SD**

**Position:** oppose

**Comment:**

I am in opposition to the petition that would allow nonresidents to hunt raccoons with the aid of hounds. Hounding not only results in the injury & death of the wild animal, but sometimes the dogs themselves. Animals are run to exhaustion & sometimes mauled. Most people, including many sportsmen, consider hounding unethical & not "fair chase" hunting.

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**Yvonne Lange**

**Groton SD**

**Position:** oppose

**Comment:**

I'm writing in opposition to the petition that would allow non-residents to hunt raccoons with the aid of hounds.

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**Chris Krohmer**

**Mitchell SD**

**Position:** oppose

**Comment:**

Hound / Coon hunting. It's frightening to think about what kind of a human would find this to be any type of sport or entertainment. Are we even going to have an animal that is native to SD soon? Please don't allow this. It's just awful.

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**Cherree Watterson**

**Pierre SD**

**Position:** oppose

**Comment:**

I oppose allowing non-residents hunting raccoons with dogs.

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**Tyler Donahue**

**Hermosa SD**

**Position:** support

**Comment:**

I would like to see BLack Hills Turkey transition to a draw and have the opener put back to match the prairie opener. More non resident tags are being sold than resident tags which is an issue I don't think the 8% cap makes sense for it as there are still good numbers of birds and would fully support resident tags going to a draw or remaining otc. I would much prefer a more quality hunting experience than being granted a tag every year.

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**Mary Mcwhorter**

**Woonsocket SD**

**Position:** oppose

**Comment:**

John Ames shot 5 blue geese off Lake Prior in Woonsocket

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**Michael Dunlevie**

**Eagle CO**

**Position:** oppose

**Comment:**

I oppose the closing/decommissioning of Custer State Airport. For my trips to the area the airport offers options exclusive from others in the area. If closed I would likely stop visiting the area.

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**Annette Hof**

**Crooks SD**

**Position:** other

**Comment:**

No comment text provided.

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**Kent Walz**

**Harrisburg SD**

**Position:** support

**Comment:**

Why does GFP not have a verified scale to weigh fish in case of a state record. Nor do you have a listing of the places that do have verified scales. How is it then that we can keep accurate records and legitimate verifications of state records.

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**Julia Natvig**

**Sioux Falls SD**

**Position:** oppose

**Comment:**

Most people, including me, think hound hunting is unethical and not "fair chase" hunting. Packs of dogs chasing wild animals is also a public safety and private property issue. Dogs can run miles away from their handlers and are not under their control. Finally, this so-called "sport" is just plain cruel, sadistic and unnecessary. Leave animals in nature unharmed and keep your dogs at home by the hearth.

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**Tori Miles**

**Tea SD**

**Position:** oppose

**Comment:**

This is cruel and unnecessary to hunt raccoons with dogs.

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**Alexey Egorov**

**Brookings SD**

**Position:** oppose

**Comment:**

I vote against hunting raccoons with dogs. We live in the third millennium, not the Middle Ages. We have no shortage of hides or food. Killing wild animals just for the sake of killing is not modern and not even savage. This medieval tradition instills cruelty in people and should remain in the past. Taking care of the wildlife and environment rather than shooting everything that moves should become a priority. GFP is already carrying out an all-out predator genocide across South Dakota through its bounty program. Why can't you leave them alone and let them live their lives in peace on their land? South Dakota wildlife and public lands belong to all South Dakotans, not just a small group of hunters.

So, I am writing in opposition to the petition that would allow nonresidents to hunt raccoons with the aid of hounds.

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**Heidi Madsen**

**Carpenter SD**

**Position:** oppose

**Comment:**

I am writing in opposition to the petition that would allow nonresidents to hunt raccoons with the aid of hounds.

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**Renee Lefthand**

**Freeman SD**

**Position:** oppose

**Comment:**

Do not agree with allowing raccoons to be more hunted. Just stop

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**Adrian Forrette**

**Rapid City SD**

**Position:** oppose

**Comment:**

Not only am I opposed and dismayed by the petition to allow non-residents permit to hunt raccoons with dogs, I am opposed to the hunting of raccoons. The wanton culture of animal cruelty promoted by our governor must be replaced with compassion, here and now. Thank you!

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**Adrian Forrette**

**Rapid City SD**

**Position:** oppose

**Comment:**

Not only am I opposed and dismayed by the petition to allow non-residents permit to hunt raccoons with dogs, I am opposed to the hunting of raccoons. The wanton culture of animal cruelty promoted by our governor must be replaced with compassion, here and now. Thank you!

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**Jeanette Williams**

**Vermillion SD**

**Position:** oppose

**Comment:**

For God's sake please do not allow dogs to hunt raccoons.

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**Chandra Knowles-Dicus**

**Tea SD**

**Position:** oppose

**Comment:**

Out of state hunters should not be allowed to come.in with dogs to hunt raccoons.

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**Nancy Hilding**

**Black Hawk SD**

**Position:** oppose

**Comment:**

At 5:52 pm MT on June 2nd (written comment deadline day) you don't have a field for the finalization to the fur-bearer season: the rule change for raccoon season to allow out-of-state hound hunters.

You don't have an agenda up or an early version of the Commission Book or a copy of the public notice of the hearing.

In recent months, you have stopped publishing the proposals as separate items, and people have to find them in the Commission Book. So people wanting to learn if they need comment on raccoons, they have to download the whole May Commission book from the archives and search for proposals.

This is inadequate notice.

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**Dean Parker**

**Sioux Falls SD**

**Position:** oppose

**Comment:**

I'm writing in opposition of the petition that would allow nonresidents to hunt raccoons with dogs. Hound hunting not only results in the injury and death of the wild animal, but sometimes the dogs themselves.

Animals are run to exhaustion and can be mauled if not able to climb a tree in time. Most people, including many sportsmen, consider hounding unethical and not "fair chase" hunting.

South Dakotans do not want more hound hunting opportunities in our state.

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**Sara Parker**

**Sioux Falls SD**

**Position:** oppose

**Comment:**

As a life-long resident of South Dakota, I'm writing in opposition of the rule/proposal that would allow out-of-state hunters to use dogs to hunt raccoons.

Hound hunting is inhumane – it not only results in the injury and death of the wild animal, but sometimes the dogs themselves. Animals are run to exhaustion and can be mauled if unable to climb a tree in time. Hound hunting of raccoons is animal cruelty, and hound hunting by groups of hunters in competitions creates cumulative cruelty.

Packs of dogs chasing wild animals are also a public safety and private property issue - dogs can run miles away from their handlers and are not under their control. Dogs can't read No Trespassing or Private Property signs....

Please don't let the agenda of a special interest group dictate the policy of our wildlife. South Dakota wildlife and public lands belong to all South Dakotans to enjoy, not just a select few.

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**Wolfgang & Kathleen Schmidt**

**Nemo SD**

**Position:** oppose

**Comment:**

Is it really necessary to allow out-of-state hunters to hunt raccoons with hounds? Haven't enough raccoons been killed this year with the cruel Nest Predator Bounty Program? From what we can tell on the GF&P site, over 22,600 raccoons have been trapped and killed in 2024 alone. Our state has become nationally known lately for animal cruelty. It is about time we turn this negative publicity around and stop all of this senseless killing of the wildlife that inhabits our state.

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**John Hauge**

**Deadwood SD**

**Position:** oppose

**Comment:**

I am writing to express my complete opposition to allowing non-residents to hunt raccoons with the aid of hounds. I have not seen a live raccoon for years. There just doesn't seem to be any around. I also judge the number by the amount of roadkill I see while driving around the state. I see far less roadkill of raccoons than I did 10 years ago. A rough method, but should be proportional to the density of raccoons. The NPBP has reduced the population considerably.

Thank you,  
John Hauge

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**Suzan Nolan**

**Rapid City TX**

**Position:** oppose

**Comment:**

I vehemently oppose hunting of mountain lions and raccoons with hounds. This is cruel and inhumane. It's only done for sport and the wanton killing of animals upsets the balance of nature. I also oppose allowing this for out of state hunters as well as in state hunters. Honestly, what depths people will sink to!

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**Julie Anderson**

**Rapid City SD**

**Position:** oppose

**Comment:**

I oppose allowing non residents  
to hound hunt raccoons.

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**Nancy Hilding**

**Black Hawk SD**

**Position:** oppose

**Comment:**

Nancy Hilding  
Prairie Hills Audubon Society  
Black Hawk, SD 57718

**Attachment #12617**

We attach our comment letter on the proposal to allow out-of-state hound hunters for raccoon



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**Vickie Hauge**

**Deadwood SD**

**Position:** other

**Comment:**

I am writing about your proposal to allow out of state hunters with hounds, to come here & hunt raccoons. I feel like you are making these decisions to keep your positions in GFP, at the expense of the animals in this state. Cruelty knows no limit in the decisions that have been made in this state, since our current governor has been in office. I use to feel that you in the GFP world, did your best to manage our wildlife for future generations enjoyment. Bringing hounds & hunters into this state for the money, is so sad. Our state is better than this I hope! I ask you to reconsider this proposal. Thank you.

South Dakota Division



# The Izaak Walton League of America

Defenders of Soil, Air, Woods, Waters, and Wildlife

May 31, 2024

Re: Landowner on Own Land or Operator Leased Antlerless Elk Tag Proposal

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

Dear Commissioners,

The South Dakota Division of the Izaak Walton League of America (Division) appreciates the opportunity to comment on the proposal to create a landowner on own land or operator leased antlerless elk tag in the Prairie Elk Unit.

The passage of Senate Bill 173 authorized the creation of a new landowner on own land, or an operator leased, antlerless elk license. SB 173 charged you with promulgating rules that establish the number of licenses, determine eligibility criteria, and set the fee for this license.

During the legislative session, the Division asked that SB 173 be amended and specify that the license could only go to a person that owns, or leases, land “for agricultural purposes”. We felt that clarifying language was critically important to ensure that a person could not lease land in the prairie unit and then be “automatically” eligible to purchase an antlerless elk tag every year.

We believe the amendment to SB 173 was a fairness issue. We think the amendment helps maintain the integrity of the state’s elk license draw and prevents a person from circumventing the license draw process. As you are aware, an elk tag is the most coveted big game license in the state. Last year over 47,000 applications were received for the state’s elk licenses.

During the session, the Division opposed SB 173. We believed the bill, as written, was too broad and not based on science. No population survey is conducted in the prairie elk unit. Currently there isn’t any scientific data or an accurate assessment of elk numbers in the prairie management unit.

Under this proposal, fifty percent of an approved unit’s licenses would be available to persons who qualify for landowner owned land or leased operator preference under the provisions of SDCL 41-6-21.

To qualify for this license a person must own, or lease, agricultural land within an elk unit that has at least 500 elk use days since the last day of the previous application period. An elk use day is defined as any day an elk feeds or waters on private land.

The South Dakota Division opposes this proposal if it continues to include the entire West River Area (PRE-WRA). As previously stated, it’s unknown if the elk population in that huge management unit are above, or below, any population objectives.

Establishing a new license for that entire management unit, without a scientifically obtained population estimate, we think is putting the cart in front of the horse.

The Division believes it's imperative that an accurate population survey be conducted, and be fully assessed, before the step of landowner on own land or leased operator license is taken. If this proposal were limited to only include elk units PRE-11D and PRE-11E in Bennett and Jackson counties, where elk crop depredation has been documented, we could support it

Regarding the eligibility criteria for a landowner on owned land or leased operator to qualify for an antlerless elk tag, the Division recommends changing the minimum number of acres required for a person to qualify. We urge changing that requirement from the proposed 240 acres to 480 acres. The reason being is that elk constantly move. They are here today and are 10-20 miles away tomorrow.

As stated earlier, an elk tag is the most sought-after big game license in the state. Increasing the minimum acreage requirement for this license would make more tags available in the public draw. That means more South Dakota hunters will have the chance to purchase those tags and get to experience the thrill of hunting elk in South Dakota.

We support the provision in this proposal that states only one qualifying applicant per ranch per year may purchase a landowner own land or operator leased elk license. The qualifying applicant for a ranch unit may not purchase a landowner own land or operator leased elk license if any qualifying member of that ranch unit holds a valid elk license for that management unit.

We support the proposal that states that a ranch unit cannot be subdivided to qualify more than one landowner own land or leased operator antlerless elk license. We also support the proposal that has the cost for a landowner on own land or leased operator antlerless elk license at one-half the fee of the antlerless elk license in § 41:06:02:03.

This proposal states there were landowners who did not receive an antlerless elk license in 2023 for the Prairie Elk hunting season. During the past Legislative Session not one landowner testified in support of SB 173, either in-person or remotely. No landowner expressed their support for the measure during the bill's public hearings. No landowner testified about their inability to purchase an antlerless elk license in the prairie unit.

The Division understands GFP is attempting to mitigate elk depredation issues and ease landowner-elk conflicts. However, the Division reminds you that the Department has already established methods, through the Animal Damage Control Program, to do just that. This includes the use of protective fencing and, when needed, establishing special depredation hunts to reduce local elk numbers.

Finally, we concur with the Department and what is stated in the proposal, that because antlerless elk harvest with landowner own land or operator leased licenses is a complete unknown, if this license is approved, we agree that this must be done very conservatively.

Prairie elk population numbers are unknown. To expand elk populations and create additional

hunting opportunities for all South Dakotans, the last thing you want to do is to facilitate the harvest too many cow elk in the Prairie Management Unit.

The South Dakota Division of the Izaak Walton League of America thanks you for the opportunity to comment on this proposal and for your time and consideration.

Sincerely,

A handwritten signature in cursive script that reads "Paul Lepisto".

Paul Lepisto  
Regional Conservation Coordinator  
Izaak Walton League of America  
1115 South Cleveland Avenue  
Pierre, SD 57501-4456  
plepisto@iwla.org

Nancy Hilding  
President  
Prairie Hills Audubon Society  
P.O. Box 788  
Black Hawk, SD 57718  
June 2<sup>nd</sup>, 2024

SD Game, Fish & Parks  
523 East Capitol Ave  
Pierre, SD 57501

Dear Game, Fish and Parks Commission

RE: Proposal to **allow out-of-state hound hunters to hunt raccoon** in SD. [https://phas-wsd.org/wp-content/uploads/Raccoons.Hound\\_HuntRule.June23Commission.pdf](https://phas-wsd.org/wp-content/uploads/Raccoons.Hound_HuntRule.June23Commission.pdf)

We are opposed to all hound hunting of wildlife, except for that related to research efforts, removal of conflict animals and perhaps in some instances where an endangered or threatened species is at risk. We believe hound hunting can result in animal cruelty to both the target wildlife and the dogs. If you persist with promotion and increasing of hound hunting, you need to balance that with regulations to minimize potential for animal cruelty to wildlife and/or dogs. We suggested some as petitions for rule-making in fall 2023, but unfortunately those were rejected.

The original petitioner in the fall of 2023 wanted out-of-state hound hunters so as to accompany locals and to attend raccoon hound hunting competitions.

We **object to hunting competitions**, whose methods involve killing and/or chasing target animals. We are aware that some raccoon hound hunting competitions kill the treed raccoons and some don't. We are aware that some barking contests suspend live raccoons in cages above barking dogs and some suspend dead raccoons. We don't believe that SD has any regulations to govern raccoon hound hunting competitions, so as to address animal cruelty issues, and if you are going to promote animal hunting competitions, you should create some regulation of competitions.

We are aware that some folks training dogs to hunt raccoon, engage in "blooding", where dogs learn to kill a raccoon in a flimsy cage. We include a link to a video on raccoon hound hunting that shows hunters repeatedly shooting raccoons at night in trees, which raccoons fall to the ground alive to be mauled by dogs, and in one instance, hunter pulls dog away to allow raccoon to go up the tree and be shot, to protect the dog from the raccoon bites/scratches.  
<https://www.youtube.com/watch?v=wUIK-Scw1eY>

There is no statewide law requiring **rabies shots** for local in-state dogs. This is left up to the counties or cities. There is however a state law or rule that requires rabies shots for out-of-

state dogs who will be here for a month or longer. In southern and eastern USA raccoons are one of several wildlife species, where rabies is a concern. Due to risk of hounds who hunt raccoons being bitten by the raccoons and the potential for trespass by hounds, we request the raccoon hunting season rule be amended to:

1) require rabies shots of any hound used for hound hunting of raccoons, whether the hound lives in or out-of-state.

2) We also request distemper shots be required, as both species get distemper, as do so many other mammals.

3) require micro-chips so dogs can be identified

4) require e-collars so they can be better controlled

Requiring the dog owners to invest dollars in the health of their dogs, may dampen the practice of killing dogs between hunting seasons to save money caring for them.

We are opposed to hound hunting for the risk of trespass and disturbance to non-target wildlife. Raccoon hunting happens at night so there is more risk of non-target wildlife, domestic animals or property being shot or disturbed.

We include a link to an article where raccoons in European Zoo are shown to preferentially eat zebra mussels. <https://www.tandfonline.com/doi/full/10.1080/23308249.2023.2235437>

European raccoons are exotic transplants from America.

Raccoons will be targeted by both the new coon hunters and the Nest Predator Bounty Program (NPBP), where raccoons are taken the most (42,300 raccoons or 83% of predators trapped for NPBP in 2023). Raccoon pelts on the fur market are worth less than the \$10 the NPBP pays, which may reflect why so many are killed in the NPBP. It seems SDGFP disregards raccoons, their intelligence and their importance.

If you move forward with this rule, we suggest you amend it to outlaw raccoon hunting or trapping in the immediate vicinity of any lake or surface water infested by zebra mussels.

Raccoons have very sensitive hands and their hands are more sensitive when wet (which is why they seem to be always washing things). We believe the very long 3 and a partial day and 2 and a partial day, trap check times of SD, while egregious for all SD wildlife, they are especially egregious for raccoons.

Thanks,



Nancy Hilding