

# Public Comments

## 01. Archery Deer Hunting Season

**5/7/2018**

**Kurt Rahlf**

**Mobridge SD**  
**starky069@yahoo.com**

**Comment:**

I think starting sept 1 is a great idea

**5/7/2018**

**Daniel Amen**

**Rapid City SD**  
**dakotainc@gmail.com**

**Comment:**

I do think this is a good idea and support this proposal.

**5/7/2018**

**Dylan Marsh**

**Sioux Falls SD**  
**mmarshalldylan@aol.com**

**Comment:**

I highly agree with the state date of Sept 1st. Gives you a chance to harvest a velvet buck and hunt a buck without pheasant hunters running them all over.

**5/7/2018**

**Roger Heintzman**

**Aberdeen SD**

**r\_heintzman@hotmail.com**

**Comment:**

I support the changes or all above listed proposals to be finalized June 7th.

**5/7/2018**

**Andrew Erickson**

**Centerville SD**

**andrew\_erickson\_23@hotmail.com**

**Comment:**

No comment text provided.

**5/7/2018**

**Josiah Christoffer**

**Sioux Falls SD**

**josiahchristoffer@gmail.com**

**Comment:**

I would love to see this change. I am surely not abreast of the potential drawbacks of a start date move, but I do feel it would greatly increase my chance of success. I would much rather hu

**5/7/2018**

**James Cantalope**

**Eureka SD**

**cantajam@yahoo.com**

**Comment:**

I support a start date of Sept 15, which would be the start date every year , just due to the youth and resident pheasant seasons kicking in earlier on public ground then the reg season opener, gives a few more days to hunt before pheasant hunters take to the field. Thank you!!!

**5/7/2018**

**Timothy Moore**

**SD**

**Comment:**

No comment text provided.

**5/7/2018**

**Dan Kavanaugh**

**Pillager MN**

**Dan@dankavanaugh.com**

**Comment:**

I am very supportive or at Archery opener sept 1st ... I spend money in ND every year to hunt early season deer and Now would go to SD

**5/7/2018**

**Joseph Kavanaugh**

**Denver CO**

**jkavanaugh@skybridgeresources.com**

**Comment:**

Another great way to generate license fees for outdoors man and women who would like a chance to harvest a velvet buck.

**5/7/2018**

**Jeremiah Johnson**

**Sioux Falls SD**

**Jeremiah\_j77@hotmail.com**

**Comment:**

This would be a great change, especially as it pertains mule deer hunting.

**5/7/2018**

**Andy Viet**

**Sioux Falls SD**

**Aviet88@hotmail.com**

**Comment:**

No comment text provided.

**5/7/2018**

**Neil Hylla**

**Gregory SD**  
**neilhyla@hotmail.com**

**Comment:**

I really can not see a reason not to allow archery season to open sept 1st. Our neighboring states are doing this and having some success bringing in hunters for an opportunity to harvest a velvet deer. The early season will also give archery hunters more time to spend archery hunting and still enjoy all of the other hunting seasons that the fall offers.

**5/7/2018**

**Damon Brueggemen**

**Miller SD**

**Comment:**

I think it would be great!

**5/7/2018**

**Aaron Glasford**

**Aberdeen SD**  
**aglasford@hotmail.com**

**Comment:**

Would put us like States around us. definitely a good idea.

**5/7/2018**

**Lee Nelson**

**Rapid City SD  
leemnelson@hotmail.com**

**Comment:**

No comment text provided.

**5/7/2018**

**Dave Kavanaugh**

**East Gull Lake MN  
Dave@kavanaughs.com**

**Comment:**

No comment text provided.

**5/7/2018**

**Bryan Vyhldal**

**Harrisburg SD  
bvyhldal@yahoo.com**

**Comment:**

-Lengthen the season 3 weeks.

-This would no longer combine Archery Deer Opener with either Youth Duck Opener -or- Duck Opener in some zones.

-Nebraska and North Dakota open on September 1. This opening date would give Archery hunters the possible opportunity at harvesting a velvet buck.

Thank you for your time! BryanV

**5/8/2018**

**Collin Rhine**

**Philip SD**

**Collin.rhine@state.sd.us**

**Comment:**

I would like to strongly encourage the commission to allow archery season to begin on September 1. I was very opposed to ending the deer seasons on January 1, so this would make up for some of the time that was lost. I think this could possibly create more opportunity for people to hunt before it gets cold and to allow for a different hunting experience a few weeks earlier than in the past. I Strongly encourage the commission to allow this.

**5/8/2018**

**Robert Wright**

**Sioux Falls SD**

**robert.wright@augie.edu**

**Comment:**

This is a fantastic idea. I would just remind y'all to think about other dates, like the start and take down dates for putting up blinds and stands. Maybe Aug. 15 to Jan. 15? This change also might suggest moving up the dove dates from Aug. 15 to say the start of pheasant season. Many doves flee the prairie in early Sept. it seems, if we get cold nights, which we often do that time of year. There would be less friction between doves and archers starting on the same morning.

**5/8/2018**

**Guy Bennett**

**Rapid City SD**

**guy.bennett@rcgov.org**

**Comment:**

I think this is a great idea. It will bring us closer to the other western states on season openers. It will also be a chance to get new hunters out hunting in very enjoyable weather conditions.

**5/8/2018**

**Kevin Bruzelius**

**Pierre SD**

**kevin.bruzelius@state.sd.us**

**Comment:**

Would also like to see it go thru the end of Jan.

**5/8/2018**

**Matthew Werpy**

**Rapid City SD**

**Mattwerpy@gmail.com**

**Comment:**

This change would allow for increased opportunity for archery hunters across the state. It will also help to get new hunters involved as weather is more favorable this time of year as opposed to late season opportunities allowing for more positive hunting experiences for these new hunters.

**5/8/2018**

**Adam Newman**

**Rapid City SD**

**Adampaulnewman@me.com**

**Comment:**

I would actually support starting it earlier on the last Saturday of August because out of state hunters that also hunt surrounding states that All start sept 1 would start in SD bringing more revenue to SD.



**5/8/2018**

**Stephanie Newman**

**Rapid City SD  
Stephnewman@me.com**

**Comment:**

No comment text provided.

**5/8/2018**

**Adam Newman**

**Rapid City SD  
Jerrynewman@ymail.com**

**Comment:**

No comment text provided.

**5/8/2018**

**Chad Mccreight**

**Lincoln NE  
Cmccreight@neb.rr.com**

**Comment:**

I would come to SD every year and hunt deer if I could pursue them in the velvet.

**5/8/2018**

**Brett Johnson**

**Rapid City SD**

**Brett\_mjohnson@yahoo.com**

**Comment:**

I support the Sept 1 opener for archery deer.

**5/8/2018**

**Zach Hawkins**

**Sioux Falls SD**

**Comment:**

Earlier archery season makes sense and is inline with other neighboring states.

**5/8/2018**

**Rusty Lytle**

**Wall SD**

**Comment:**

We already have a lot of pressure from hunters driving down our roads and we are still irrigating until the middle of October and our pivots cross the road. No trespassing and road closed signs seem not to make a difference. We don't need to have to patrol for another month.

**5/8/2018**

**Larry Hannan**

**Rapid City SD**

**Comment:**

This is important because of the early start date of youth seasons.

**5/9/2018**

**Quintin Biermann**

**Rapid City SD**

**Quintin.biermann@hotmail.com**

**Comment:**

September 1 opener would be great. Please institute draw for nonresidents.

**5/9/2018**

**Brian Barnes**

**Rapid City SD**

**brianbarnes1996@gmail.com**

**Comment:**

Sept 1 is an optimum time to open the Archery Deer Season, it opens up a very congested fall hunting season. Allows a completely different hunting experience for even seasoned archery hunters. The more opportunities the state can create to get people hunting the better. Our neighbor to the North have been cashing in on this early archery season for years. Drawing in hunters nation wide to get a jump start to the fall. Warm weather and velvet clad bucks lure hunters by the 100s.

**5/9/2018**

**Justin Allen**

**Pierre SD**

**Comment:**

Dear Commissioners,

I'm writing today with comments, concerns and statistics on archery season dates, license allocation and harvest. First off I do not support an earlier archery season opener and believe the opening day should remain as is. The season is long enough as is if not too long already. As a bow hunter for over 20 years I have become very concerned with archery harvest and pressure over the last 10 years plus in many portions of the state. I believe many GFP staff members realized this but ultimately it is the commission that finalizes these changes. Looking at harvest stats several counties in SD have higher archery buck harvest than by firearm. Counties would include Minnehaha, Codington, Brookings (within 10%), Yankton, Lake. In my opinion mule deer harvest by archery in counties in West Sully, Stanley, Custer National Forest and Black Hills is a huge concern as well. Firearm deer harvest in last 10 years has decreased by 60%, in the same time archery harvest has only decreased by roughly 15%. Modern bows have more hunters in the field for more days while being able to take longer more accurate shots which in turn have increased harvest and harvest success rates dramatically. There has been a large decrease in firearm deer licenses and ultimately hunting opportunity in the last 10 years, however, at the same time archery hunters have had to make little to no sacrifice to lower deer numbers. I hate to say it but maybe archery hunters have had it way too good for way too long? Opening the bow season any earlier will only increase harvest by bow and increase licenses sales for NR hunters that already flood SD to bow hunt as is. I'm guessing the only reason some want to open the season earlier is the chance they can shoot a velvet buck. Personally that seems like a bad management reason to increase the season length. 4 months to bow hunt is crazy IMO. Many are concerned there is too much pressure of deer overall but we are talking about one of the most liberal bow seasons in the country? Trying to increase deer numbers across SD but going to have 4 month bow season? Trying to manage mule deer harvest and everyone is talking to many NR bow hunters but we are talking about a 4 month bow season? Overhunted public lands but a 4 month bow season? Please do not move the bow season any earlier than it already is to please a few that just want to kill a velvet buck. Archery hunting is/has become too popular and hunters have become too efficient at killing deer not to be regulated basically at all in South Dakota.

Additionally, I believe several changes need to be made when it comes to archery licenses allocations. Counties along the Missouri River have extreme pressure by NRs and residents on public land for 3 straight months (hopefully not 4 months). Judging by harvest stats I can assume many other counties are the same. Many of these counties in question are extremely tough to draw any deer firearm licenses taking 3-4 plus years to draw. I find it tough to swallow waiting 3-5 years for a tag when archery licenses and harvest is totally unregulated in the same unit as those extremely tough to draw firearm units. In turn I would support some limited draw bow areas throughout the state. You can't call a unit limited access for firearm season when it isn't limited to all type of deer hunting. I would also support an overall 8% license allocation (8% of previous year resident archery license sales) for limited draw Non-resident archery tags; these would be statewide tags except the limited access units. I support only allowing one statewide any deer license, eliminating allowing residents to obtain both an east and west river any deer licenses. Counties across the state have slashed buck tag licenses but archery hunters are still living in the glory years, I really think certain portions of the state need have some reduction in pressure and harvest by archery hunters.

Thank you for time,  
Justin Allen  
Pierre, SD

**5/9/2018**

**Randy Routier**

**Buffalo SD**

**Comment:**

It would not only create more archery deer hunting opportunities but also combo archery deer and archery antelope hunting. More income for the state and mor

**5/9/2018**

**Andrew Ward**

**MN**

**Comment:**

More opportunity, travel, tourism that flows through to the local/state economies and harvest rate is low enough during archery seasons that it won't meaningfully impact game populations

**5/9/2018**

**Scott Guffey**

**Rapid City SD**  
**guffeyscott@gmail.com**

**Comment:**

I am opposed to moving the archery deer start to September 1st. If you do move forward with this change, I would encourage the commission to keep the start date the same or move it to October 1st for the Black Hills National Forest and Custer National Forest, because of the archery/firearm elk hunters. Most of the elk hunters have waited a long time to finally draw a SD elk tag and most will draw maybe two in there lifetime. With elk tags being such a coveted tag, there is no need to have archery deer hunters on the national forests conflicting with the elk hunters.

**5/9/2018**

**Meghan Biermann**

**Rapid City SD**

**Meghan\_2012@hotmail.com**

**Comment:**

I support moving the bow opener up to September 1st. I also support limiting non resident bow tags with a lottery option.

**5/10/2018**

**Marc Moore**

**Custer SD**

**Carrieknows02@goldenwest.net**

**Comment:**

Current archery deer season starting in the third week in September is sufficient. The question I would ask is what would be the impact of changing that season to an earlier date on deer populations?

**5/13/2018**

**Eric Stiefvater**

**Belle Fourche SD**

**edshusker@yahoo.com**

**Comment:**

I strongly support an archery deer start date of September 1st. Thanks

**5/14/2018**

**Cody Ruml**

**Letcher SD**

**codyruml1998@gmail.com**

**Comment:**

Would be awesome to be given the chance to hunt early season velvet bucks with archery equipment. I feel it will be very popular and bring more people into the sport.

**5/14/2018**

**Andrew Krier**

**Harrisburg SD**

**andrewckrier@gmail.com**

**Comment:**

I fully support changing the archery opening date to September 1st. It gives hunters a better opportunity at filling their tag with a velvet buck, a deer many hunters dream of shooting. With this change I also propose closing all deer seasons not to re-open after December 31st. If the opening date is changed, please consider adding a restriction for bucks only until a certain date to prevent does with fawns getting shot. Thank you for your consideration.

**5/14/2018**

**Sean Newberg**

**Parker SD**

**newbergsean92@gmail.com**

**Comment:**

I believe changing the deer archery opening date to Sept 1 would not only provide hunters with more time to harvest deer but would allow youth/new hunters a more enjoyable experience as well without having to sit in the extreme cold. By allowing more time to harvest deer it would also help balance the herd letting hunters pass on immature deer to harvest a mature deer creating a more enjoyable experience and a healthier Deer herd in the process by making a better structure.

**5/14/2018**

**Mark Smedsrud**

**Sioux Falls SD**

**Maksmedsrud@msn.com**

**Comment:**

I would support this proposal on one condition. We need to have a limited draw for non-residents. We are starting to see an influx of nonresidents because of our liberal archery season license draw. I compete every year with NR on public ground in spot and stalk situations. Every year I seem to encounter more. With our liberal tags and numerous hunting shows advertising this fact I'm afraid it will limit resident opportunities, especially for the chance at shooting bucks in velvet. Please reconsider the early date in regards to the increase in nonresident licenses.

**5/14/2018**

**Chris Medill**

**Aberdeen SD**

**chrismedill@yahoo.com**

**Comment:**

I would really like to see the start date changed to Sept. 1. I am primarily a archery hunter, and I would love to see SD start the same time as a lot of the other western states. I also see this as an advantage as I would now be able to hunt deer during their summer patterns.

**5/14/2018**

**Wade Harkema**

**Volga SD**

**Wharkema68@gmail.com**

**Comment:**

Please do not move the archery deer season to September 1st. As an archery and rifle hunter I don't think it is right to keep expanding archery hunting while limited draw rifle deer licenses are getting harder to get.



**5/14/2018**

**Brian Hansen**

**Bath SD**

**Bhansen@northernelectric.coop**

**Comment:**

I would love to see the season start earlier. Many of the Western States have their season start the 1st of the month and allows archers a better chance for early season deer.

**5/14/2018**

**Lester Roggenbauer**

**Elk Point SD**

**roggenbauer@gmail.com**

**Comment:**

Open Sep. 1st for Resident Only, this would provide SD residents greater opportunity to harvest a "velvet" buck and hunt public ground before the non-resident migration. I would also support capping NR tags.

**5/14/2018**

**Jamea Nelson**

**Rapid City SD**

**James.nelson1@coldwellbanker.com**

**Comment:**

This is great for Sd residents to have a chance at a velvet buck. But this could bring problems with more non residents coming in and over hunting our public ground. The non resident tags should have a draw or their season should stay the same as it is now and give residents first chance at harvesting deer and hunting our public ground.

**5/14/2018**

**Nate Baumgarn**

**Webster SD**

**natin02@hotmail.com**

**Comment:**

I'd like to comment saying I would support a Sept. 1 archery opener. I believe in rewarding SoDak citizens by giving them a unique opportunity in their home state. For me, that opportunity is having a chance to harvest a mature velvet buck. A coworker and mine are currently looking to spend thousands of dollars on a Nebraska outfitter for the chance at a velvet mule deer. If South Dakota opened earlier, we would gladly spend that \$4,000 in state. However, I do believe the Non Resident tags would increase, and cause more pressure. I would love the idea of September 1 Opener, and hope it works out. Thanks for your time!

**5/14/2018**

**Christian Mchugh**

**Mobridge SD**

**cmchugh@jacks.sdstate.edu**

**Comment:**

I am in favor of a September 1st archery opener to give those who are true archery hunters an opportunity to chase a deer in velvet. However, Some of the precautions that worry me are the amount of both residents and nonresidents that will be hammering away at mulies when they are very vulnerable in velvet. A suggestion would be to flirt with the idea of maybe a permit that one can acquire every 4 years maybe...put some form of a cap on it. Could keep archery season the same dates...then a free application for a permit to have one month earlier dates. It could be acquired the same way that the Custer State Park lion permits are. Free, but it is a way to regulate the access. Also, odds are there will be more people, especially nonresidents that will pursue velvet deer, so will an earlier success on one tag give them more reason or incentive to shoot another in a different location (ie, East River Archery and West River Archery). As always, we want to increase opportunity without it having a negative impact on the wildlife.

**5/14/2018**

**Branden West**

**SD**

**tbwest@gwtc.net**

**Comment:**

Season dates for deer should coincide with better management practice for the purpose of herd health. As in (all) doe seasons should be in October. Why you may ask? This is when they will wean their young and be prior to being breed. Next rifle deer season should not start before 12/1. Why? Because this gives your healthy mature bucks the opportunity to breed the majority of the does. Mostly all common sense!

**5/14/2018**

**Nick Welch**

**Mccook Lake SD**

**Vmax508502@aol.com**

**Comment:**

I am supporting the archery deer September 1st start proposal. I have kids and getting them out in the warmer nicer weather really helps with getting them involved. I would like to thank you very much for the consideration.

**5/14/2018**

**Matt Fonder**

**Aberdeen SD**

**mfondu@yahoo.com**

**Comment:**

I believe our archery season is sufficient the way it is. I have been archery hunting South Dakota for decades, and am concerned that this proposal, if implemented, could have unintended consequences that would affect the future of archery hunting and deer hunting overall in SD. I might consider supporting it if there were non-resident license caps and "no public land" (like the Special Buck tags) attached to these early tags. At least for the month of September. Thank you for your time and consideration!

**5/15/2018**

**Rick Hanger**

**Sioux Falls SD**

**hangfire49@sio.midco.net**

**Comment:**

I probably wouldn't hunt so early in the year due to heat and mosquitoes. I am not opposed to it for those that may like or need the early season. I do however think there should be some restrictions. Perhaps resident only for the first three weeks of the season. Similar to the resident only early hunts for pheasant. I also feel the non resident tags should be a limited draw and higher priced. Unlimited non residents chasing velvet bucks could be a detriment to the quality and quantity of opportunities for residents.

**5/15/2018**

**Andrew Krier**

**Harrisburg SD**

**Andrewckrier@gmail.com**

**Comment:**

I fully oppose allowing archery hunters to carry firearms while archery hunting. As much as I would love to trust the honor system, this would only make it much easier for "hunters" or "poachers" in my opinion to fill two tags with their rifle. I encourage you to keep the law as is!

**5/15/2018**

**Conner Mesman**

**Sioux Falls SD**

**Comment:**

No comment text provided.

**5/15/2018**

**Jim Bjoekmann**

**Howard SD**

**Comment:**

Please oppose this change. Starting the archery season earlier will only increase NR pressure and lead to more conflict. The Commission just took away days at the end of the season because landowners felt that hunting seasons were too long. Now you guys and gals are trying to add more days on the front? Doesn't make any sense! Please keep the current start date and oppose this change. Thank you for your time.

**5/16/2018**

**Nathan Lukkes**

**Pierre SD**

**lukkesn@hotmail.com**

**Comment:**

It would be nice to have an opportunity at a velvet buck in my home state as opposed to having to travel out of state where they have earlier season dates.

**5/16/2018**

**Craig Niemann**

**Volga SD**

**craigniemann2018@gmail.com**

**Comment:**

I fully support moving Statewide Archery Tag to September 1st. Leaving the East and West river archery tags the 4th Saturday of September.

Reasons I support this:

1. Opportunity to chase a velvet buck

- I say opportunity because while I would like to chase a big mule deer in velvet; I have a real problem only buying one tag for the year. I most likely would wait till the 4th Saturday and get an east and west river tag. Others only get a statewide tag and would probably choose to hunt Sept. 1st.

2. Makes the person wanting to hunt earlier choose to have 1 state wide archery tag or 2 tags; one each for east and west river.

3. Not many people will get out and hunt September 1st because it is still hot, humid, and full of mosquitoes.

4. Gives archery hunters an opportunity to hunt before duck opener. Duck opener is the 4th Saturday of September. Good public deer hunting lands become not good deer hunting because the shotguns start banging the same morning we have first crack with the bow.

5. Just another way to improve the deer hunting opportunity in the best state to deer hunt in the USA.

Thank you for hearing my comments. Thank you also for the supreme deer management in the state, In my opinion South Dakota is the best state for consistent deer hunting opportunity. The variety of seasons and dates. The abundance of left over tags and specialty preference point draw tags. The states aggressive reaction to disease kills; buying back licenses or not issuing any. The habitat of both public and private land. All of this is why I continue to take pride in this state.

Thank you,

Craig Niemann

**5/17/2018**

**Nicholas Renemans**

**Fort Pierre SD**

**Comment:**

I completely support moving the archery season to start Sept 1st. There are several surrounding states that already go by these season start dates. I think it's fine to end it earlier. It would be fine to end it before Jan 1.

**5/17/2018**

**Clint Barber**

**SD**

**Clint.barber@jacks.sdstate.edu**

**Comment:**

I'm in support of the proposed earlier archery season date change, of September 1st. I feel it would be a unique opportunity to create a more competitive balance between rifle hunters and bow hunters in South Dakota. The earlier date would give more time to bow hunters, and in return give them better opportunities to harvest a quality buck, rather than just any buck, later on in the season. A lot of bow hunters struggle having early season success, and by the time the most opportune time (the rut) comes, both West river & East river rifle seasons are underway. Also, a lot of other states have looser regulations, example; crossbow hunting for all individuals during archery only, and baiting. I'm not in favor of looser regulations equipment wise, or baiting, just citing other states, and how I feel just a date change wouldn't hurt our quality or quantity of the deer herd. With all that said I love the opportunities South Dakota Deer hunting brings to the table, and only want this change if it doesn't impact other resident tag regulations in the state. Would also like if this was open for resident only, for the September 1st opening, at least for the trial run of the earlier date. This opinion is due to a possible larger number of out of state interest, and added pressure on public lands. Thank you for the consideration.

**5/22/2018**

**Mike Wilson**

**West Branch IA**

**Bison4me@icloud.com**

**Comment:**

Fully support, provides an opportunity for a velvet hunt. In fact, why not make it easy and open it concurrently with archery antelope season?

**5/23/2018**

**Paul Johnson**

**Rapid City SD**

**Comment:**

As an avid bow hunter I'm 100% against opening the bow season earlier. The season is plenty long already if not too long. Deer in SD already get enough hunting pressure lets not increase it. Leave the opening date as is.

**5/25/2018**

**Renee Allen**

**Pierre SD**

**Comment:**

I oppose the earlier start date for bow. Already to much pressure on public lands around the Missouri River by resident and NR bow hunters. To add more days, pressure and harvest by bow hunters while at the same time gun tags/licenses have been slashed over the last 5 years seems a bit greedy and like bad management. Leave start date as is.



**5/30/2018**

**Brian Hansen**

**Bath SD**

**bhansen@northernelectric.coop**

**Comment:**

I agree with the proposed date change for the archery season to become September 1st. I think we should take a strong look at making this a residents only archery season. Other hunters like myself like to hunt west river or east river but I know in most areas which are public hunting are filled with many out of staters. I like many other hunters do not have access to much if any private ground and it can be very overwhelming to see all the out of state pickups in some of my favorite spots. I think the rule change would be a big positive for South Dakota hunting but I would personally like to see this become a residents only season as well. This would give the in staters, taxpayers and also sportsmen that hold multiple licenses in this state an ample opportunity to hunt some unpressured deer.

Thanks for taking time to hear the voices of south dakota sportsmen,  
Brian Hansen

**5/30/2018**

**Curtis Kline**

**Aberdeen SD**  
**cjkline2870@gmail.com**

**Comment:**

Dear Commission,

I support changing the start of the Archery Deer Season to Sept 1st. I feel there are two very legitimate reasons for making this change.

The first reason is the expanded opportunity that it gives SD hunters. South Dakota has fantastic opportunities for hunters. Big game, upland birds, and waterfowl are on many hunters to do list in the fall. The downside is that many times the best and most productive time for each of these seasons overlap each other. Forcing the hunter to choose one species and forego other hunting opportunity.

By starting the Archery Deer season Sept. 1st hunters will have ample time to spread out their hunting seasons. Thus giving more time later in the fall to enjoy other pursuits as well.

The second reason I support starting the Archery Deer Season Sept. 1st is it will improve the quality of archery hunts on public land. As stated above some of best archery hunting occurs when waterfowl and pheasant seasons overlap. It is highly unlikely that an archery deer hunter is going to negatively impact another parties waterfowl or pheasant hunt who may be hunting the same piece of public property. However, a party of pheasant hunters or waterfowler's can easily diminish an archery deer hunters chance of a quality hunt very quickly if hunting the same piece of public property.

The way the season structure is set up now many times archery season and duck season open the same weekend. By opening the archery deer season Sept. 1 it gives archery deer hunters time to enjoy public land hunts with less interference from waterfowl and pheasant hunters.

Thank you for the consideration,

Curtis Kline Aberdeen SD

**5/30/2018**

**Joshua Hagemann**

**Mission Hill SD**

**Jghagemann@hotmail.com**

**Comment:**

I have been in support of this change for a long time. It's hard to pattern a deer as more crops start coming out of the fields and as more of the other firearm seasons (duck, youth deer, pheasant, etc) get underway. This would give archers a chance to use all of the information we have gathered from scouting all summer long before the harvest and shotgun blasts change the deer's routine.

Thank you, Josh Hagemann

**5/31/2018**

**Daniel Morrison**

**Britton SD**

**Comment:**

I believe this is a wonderful proposal for deer hunters in South Dakota. Opportunity for hunters is always welcomed by sportsmen, the opening date proposed would also allow archers to have a slight chance at harvesting a buck still sporting it's velvet. I believe this proposal has no consequence on the deer population in this state and not adopting this proposal would be a mistake.

**6/1/2018**

**William Schwarz**

**Brookings SD**

**schwarz.billy@gmail.com**

**Comment:**

Archery deer starting on sept 1 would be awesome. Scientifically it has been proven to not be a negative on populations and gives hunters more opportunity.

**6/1/2018**

**Tom Jensen**

**Harrisburg SD**

**Tom.I.Jensen@wellsfargo.com**

**Comment:**

Please forward as appropriate, this message in support of approving a change in SD archery season to open earlier, such as Sept 1st.

Strongly support this measure, feel it is a great move to keep hunters in the state of SD during that time, versus surrounding states with similar opening dates.

**6/3/2018**

**Julie Anderson**

**Rapid City SD**

**signsofhope@rap.midco.net**

**Comment:**

Archery season in South Dakota does not need to be extended. People who oppose hunting are being excluded in this amendment. It is cruel enough without adding 2 weeks.

**6/5/2018**

**Russ Roberts**

**St Onge SD**  
**wgo@mato.com**

**Comment:**

I was on the deer working group and this was brought up a couple different times. Not much time was spent on it and there were several good reasons explained why it was not a good idea and most people in the room were not in favor. The South Dakota archery deer season is already over 3 months long with no quota and there is absolutely no reason to make it longer. It has been said that other states open that early so why not South Dakota.

Those states either have an early archery season or a later one during the rut but not both. Part of the reason the January season was shut down was landowner and conservation officer fatigue, opening September 1st does not help this. Also it would incorporate every one of the most vulnerable times of the year for our buck deer population. Last year there were 7,814 archery deer harvested in South Dakota (preliminary estimate), of those

5859 were buck deer. At a time when we should be looking at quotas for archery I don't understand why we are looking to make our archery season the most lengthy any state has with no quotas. Please do not pass this.

**6/5/2018**

**Matt Rippentrop**

**Hot Springs SD**

**mattrippentrop@hotmail.com**

**Comment:**

In April of 2014, this same early archery deer season was proposed starting Sept 1st and was voted down by the SD GFP Commissioners. In 2018, please again repeat your vote of no.

The potential new archery deer season date of Sept 1st will be detrimental to South Dakota's mule deer population, because they are on their summer range during early September and become much easier to pattern during this time. With the mule deer numbers so low across Western South Dakota right now, why should we want to find another way to decrease their population even further by allowing another month to hunt them in Sept?

Some Western States allow the Sept 1st archery season date, but they don't allow hunting during the rut (November). Typically, other Western States allow their archery season to either start early (Sept 1st) or go late (Dec), not both times are allowed to be hunted like this proposal. They also have quotas on their archery seasons and are not unlimited tags like SD.

In 2017, just over 7,800 deer were harvested in SD with archery tags and almost 5,900 of those deer were bucks. With unlimited tags and no quotas for SD's archery seasons, we can't allow more deer to be harvested on SD's archery tags.

Please consider not approving the Sept 1st archery season. Thank you for your time and consideration.

**6/5/2018**

**Jon Faulks**

**Fremont WI**

**jfaulks@waupacasand.com**

**Comment:**

I am writing in support of the proposal to move the opening date of the South Dakota archery deer season to September 1st. This will bring South Dakota into alignment with the neighboring states of Nebraska, North Dakota, and Wyoming. There is also no biological evidence that suggests the earlier opening date will result in any detrimental effect on herd health or increase archery success rates. The longer season will provide more opportunity and will space out pressure from resident and non-resident archers over a longer season. I respectfully request that you approve the proposal at the commission meeting on June 7th. Thank you for your consideration.

**6/5/2018**

**Justin Broughton**

**Sioux Falls SD**

**Justin.Broughton@premierbankcard.com**

**Comment:**

I'm writing regarding the two archery proposals before the commission during the June meeting. I strongly support moving the archery opening date to September 1st. This matches the opening dates of our neighboring states and helps to spread out the pressure on public lands during the warmer weather months. There is no sound biological reason for not moving the date to September 1. The additional opportunity for resident archers would be much appreciated!

**6/5/2018**

**Ross Swedeen**

**Rapid City SD**

**reswedeem@yahoo.com**

**Comment:**

Please do not approve the proposal to move the archery deer season date to September 1st. Deer are on their summer range that time of year, and they are much easier to pattern. I believe this proposed earlier season could be detrimental to our mule deer in particular. I believe this will increase the hunting pressure on public land as more people try to pursue velvet antlered mule deer bucks. Especially since archery licenses are unlimited and technically have no hunting units. Archery hunting in South Dakota is getting more popular with each passing year it seems. Thank you for your time. Enjoy the weekend!

**6/5/2018**

**Dana Rogers**

**Hill City SD**

**dana.rogers.1@hotmail.com**

**Comment:**

I am e-mailing in regard to the previous commission discussion tabled after SDGFP Staff brought forward a proposal to limit Non-Resident and Resident archery limited access unit permits on our larger limited access unit public land units. Non-Resident bowhunting pressure is quite high in several areas around the state. Custer National Forest, National Grasslands, Black Hills, along the Missouri River corridor and several GPA's east river.

Now we have a proposal to open the SD archery season on September 1. Though I am against that and would prefer to open on September 15 or 3rd Saturday, I wanted to point out the unintended consequence. If nothing is done to limit non-resident archery pressure for deer and antelope (particularly on public lands) AND the deer season is moved up to Sept 1, we will likely see a significant increase in NR pressure from what we already have. The over the counter (unlimited) permits for both deer and antelope and access to public land will become extremely attractive for more bowhunters to come to SD.

Our resident opportunities should be held above non-residents. After protection of the resource, protecting the resident opportunities should be next on the list...not the amount of revenue our public trust resources can bring in.

## 02. Mentored Hunter Restrictions

**5/7/2018**

**Jim Dale**

**Watertown SD**

**dales120@wat.midco.net**

**Comment:**

I am an avid hunter of birds and big game in SD and support the mentored hunting program as a way to get our youth involved. I have participated in this program with my Son with success and have peaked his interest in hunting. I am strongly opposed to the consideration of removing the minimum age for mentored hunting as I believe age 10 is honestly as young as any youth are ready for this experience. While there are probably exceptions, I think the majority of young hunters are not ready for the experience of safely shooting and taking any type of game animal before age 10 and will be more likely to have negative reactions to the experience in addition to potential serious safety issues. I support leaving the minimum age at 10 years old.



**5/7/2018**

**Selena Spring**

**Custer SD**

**selenann@hotmail.com**

**Comment:**

I am unsure what the purpose of this is or why this needs to change? I am very concerned about children operating firearms at an age under 10 yrs old. I think handing a firearm to anyone under 10 is a huge responsibility and I know that responsibility lies with the mentor too but I just have a hard time believing there are that many kids under the age of 10 that "truly" have an interest to go hunting or will it be another tag for adults to fill?! I honestly believe you will see more adults registering younger children when they actually are the ones pulling the trigger (Wisconsin has this issue just last year when they did away with the age restrictions). I also believe there are not a lot of firearms out there that have the power to bring down an animal and not cause injury to the child. Gun safety and hunting ethics are a huge part of hunting and I do not believe there are many children under 10 that understand both of those topics! I have a 13 year old and no way would I have wanted him to hunt at an even younger age. I guess my only hope would be that you still require the youth to take a hunter safety course prior to obtaining a license because hopefully this would weed out the kids much younger than 9 applying for tags.

**5/7/2018**

**Bryan Vyhldal**

**Harrisburg SD**

**bvyhldal@yahoo.com**

**Comment:**

No comment text provided.

**5/8/2018**

**Collin Rhine**

**Philip SD**

**collin.rhine@state.sd.us**

**Comment:**

I strongly encourage the commission to remove the minimum age for hunting. I think that this rule is foolish to begin with. I have a daughter that is more than capable of hunting big game but is not allowed to do so because of this rule. It should be up to the parent(s) to decide when a child is ready to hunt. Please remove this rule so that my kids and I can make the decision when they will start hunting.

**5/8/2018**

**Kelan Lechner**

**Aberdeen SD**

**kelan@nrctv.com**

**Comment:**

As a Huntsafe instructor, I can't begin to tell you how wrong this. Too young to hold a gun, too young to hunt!

**5/8/2018**

**Kevin Bruzelius**

**Pierre SD**

**kevin.bruzelius@state.sd.us**

**Comment:**

It will be tough to not go with the legislators on this, but I think we will see more hunting accidents, and more abuse of mentor tags. There are numerous videos of younger people shooting guns they can't control.

**5/9/2018**

**Mike Karcz**

**Huntley IL**

**michaeljkarcz@yahoo.com**

**Comment:**

I am not a resident of SD. I am NOT well versed in ALL of the terms of SD's mentored hunt program. I HAVE hunted in SD. I AM in favor of mentored hunts. I DO see a potential for fraud/misuse/abuse of the mentored hunt program, &/or exposure of children to unsafe/unhealthy/dangerous situations. With no restrictions, a hunter w/o scruples could bring a six (6) month old baby along under the guise of "mentoring" just to gain another & unfair opportunity to hunt for themselves, possibly exposing the child to loud noises, bad weather, dangerous geographical conditions & situations ... ..

I AM VERY MUCH IN FAVOR OF GETTING KIDS INVOLVED IN THE OUTDOORS?? But "we" are responsible to ensure their safety.

Thank you, Mike Karcz

**5/14/2018**

**Jessr Hartman**

**Lennox SD**

**jesserhartmann@gmail.com**

**Comment:**

So everyone is already complaining about deer numbers being down and I can't hardly get a doe tag anymore so now let's add more kids to the mix and lower the numbers some more. I am also a firm believer in having to take the hunter safety course before applying for a tag no matter what age. Pure laziness if kids don't have to take the course. I had to take the course and wait till I was 12 and not to mention only had a 3 week youth season. I honestly think the way things are going in South Dakota it's time to start spending my money in other states to hunt! So disappointed in the direction things are going.

**5/19/2018**

**Curtis Bossert**

**Aberdeen SD**  
**sdsmt78@gmail.com**

**Comment:**

I believe 10 is too young and this is from a father of two sons who have been hunting for as long as possible. As the number of available tags dwindle on a yearly basis, it seems that this is another method of adding an additional animal to the freezer. I support youth hunting but 10 is too early in my humble opinion.

**5/23/2018**

**Steve Chilson**

**Florence SD**

**Comment:**

The Grass Lake Conservation Club, as its last meeting, discussed the possible age change being considered to the mentored hunting season. We, as a club, feel the minimum age of 10 years should be left AS IS. Our club has helped sponsor and run the Watertown area Youth Sportsfest for more than 20 years. Kids age 8 to 14 can attend. Having witnessed the youth for the last 20 years, we feel that kids 8 and 9 years of age area, for the most part, not ready for the mentored hunt. Thank you for taking our clubs opinion into consideration as you make your decision on this issue.

## 03. Maximum Size of Hunting Groups

**5/7/2018**

**Eric Ristau**

**St Paul MN**

**rista001@umn.edu**

**Comment:**

The current party size restriction (20) is too small for family groups, during especially opening week. On the other hand, outfitted hunt group sizes should be held at the current 20 but even smaller would be better.

**5/7/2018**

**Micahel Gebes**

**Philip SD**

**mmgeb@gwtc.net**

**Comment:**

I would oppose this on public hunting grounds not on private ground.

**5/8/2018**

**Robert Wright**

**Sioux Falls SD**

**robert.wright@augie.edu**

**Comment:**

First off, I assume that this claim contains an error: "Hunters would still not be able to carry archery equipment, crossbows, muzzleloaders or firearms during small game hunts." Shotguns are firearms, right? So is the typo including firearms in this list or is it including "not"? In any event, the 20 limit has always seemed arbitrary and it is a real sore spot to pay money to hunt and have to sit out because 21 guys happen to show up. It's like getting bumped from an overbooked airplane with no compensation! Groups will naturally grow or shrink to match the field, in some of which 200 hunters could safely shoot birds.

**5/10/2018**

**Marc Moore**

**Custer SD**

**Carrieknows02@goldenwest.net**

**Comment:**

I do not support eliminating or changing the 20 person or less hunting group size restrictions currently in place. Basis for this is hunter safety. Even with the current law of a 20 person group, it can be very difficult to monitor individual positions of hunters in the field. Eliminating that requirement just increases the risk of accident that much higher.

**6/2/2018**

**Jeff Clow**

**SD**

**Comment:**

No comment text provided.

**6/3/2018**

**Julie Anderson**

**Rapid City SD**

**signsofhope@rap.midco.net**

**Comment:**

To repeal the size of hunting parties with this amendment is not ethical. More hunters will increase the guarantee of a kill and will only encourage outfitters and their trophy hunting clientele.

## 04. Accompaniment While Hunting

**5/7/2018**

**Leon Ewert**

**Piedmont SD  
cw5lhewert@gmail.com**

**Comment:**

I really can not believe it has taken this long to bring these forward. It has always seemed to me ridiculous not to allow this. With the lack of actual permits available for the number of hunters that want to go hunting it will really help family's and groups to hunt again! I remember we always had family members come in for hills hunting when everyone could get a license, now you never know who will get to hunt when or you only get to hunt every three to four years together. With these proposals When my grandsons draw tags for whatever season I can get an archery tag to cover it and join the party or vs. With the ability to mix the hunting methods we get to spend more time in the field together!!!!

**5/7/2018**

**Leon Ewert**

**Piedmont SD  
cw5lhewert@gmail.com**

**Comment:**

I do not understand this?? how else would you have a small game hunt if you can't carry archery equipment, muzzleloader, crossbow or firearm??

**5/8/2018**

**Dustin Thill**

**Mitchell SD**

**glimmerman151@hotmail.com**

**Comment:**

I think this should be allowed, due to the fact that some of the public hunting areas are large and not everyone in our party always draws a rifle tag, but usually will purchase an archery tag. This adds revenue for the state and local area we will hunt and gives the other members in the group the possibility of harvesting an animal and or helping pack out an animal a different member may have harvested. If they spent the money and have a tag, I see no reason why they shouldn't be able to do this. If someone is a poor sportsman and intends on breaking the law with an illegal harvest , they will do it anyways, so let's not penalize the majority of us who like to hunt for the commeraderie and obey the rules.

**5/9/2018**

**Sam Sommers**

**Sioux Falls SD**

**AKSam1953@gmail.com**

**Comment:**

No Firearms ? Why can't we hunt with crossbows, shotguns & bow & arrows? What's left Spears & nets & falcons. I already told my relatives to go to Nebraska. And, why no more limits on the number of hunters in a group? Pheasant hunting gets more difficult every year and letting conercial outfits go to 100 hunters or more in a group to limit out is ridiculous. I am ok with upping the number of hunters in a group but then small group hunters of less than 5 should get higher bag limits.



**5/10/2018**

**Marc Moore**

**Custer SD**

**Carrieknows02@goldenwest.net**

**Comment:**

I oppose this rule change. Current law is sufficient.

**5/14/2018**

**Chet Barney**

**Vermillion SD**

**chet@byu.net**

**Comment:**

I have long thought that if a person has both a rifle deer tag and an archery deer tag for the same area at the same time, that hunter should be able to carry both weapons.

Dr. Chet Barney

**6/1/2018**

**Roger Heintzman**

**Aberdeen SD**

**r\_heintzman@hotmail.com**

**Comment:**

Do away with extened rifle season for doe only.

## 06. Muzzleloading Rifle and Pistol Requirements

**5/7/2018**

**Scott Miles**

**Colman SD**

**scottmiles674@gmail.com**

**Comment:**

If you want to regulate the amount of powder used, state the least amount that can be used.

**5/8/2018**

**Matthew Luebke**

**SD**

**Comment:**

I don't oppose using muzzleloading handguns. However my earlier comments on using handguns during muzzleloader season was meant for centerfire / traditional handgun useage. Non- rifle cartridge capable. Similar to Montana's season.

**5/8/2018**

**Robert Wright**

**Sioux Falls SD**

**robert.wright@augie.edu**

**Comment:**

Yeah, why not?! It should get more people interested in the sport. But the biggest problem in So. Dak. is the fact that the ML season comes AFTER the gun season and is mostly antlerless. If you want more interest, have an October ML season with buck tags, like lots of states do. Then have December antlerless conversion tag season.

**5/10/2018**

**Marc Moore**

**Custer SD**

**Carrieknows02@goldenwest.net**

**Comment:**

Personally, I do not favor this proposal...although I understand the sporting intent. Typically muzzle-loading handguns (cap & ball, as well as single-shot) are much weaker in foot-lbs delivered than modern handguns, as well as regular muzzle-loading rifles. The propensity to wound a big game animals is high. And with few exceptions, most commercial muzzle-loading hand-gun sights are of poor quality.

**5/14/2018**

**Chet Barney**

**Vermillion SD**

**chet@byu.net**

**Comment:**

No comment text provided.

## 07. Bowhunter Education Requirement

**5/23/2018**

**Jim Twamley**

**Parker SD**

**Comment:**

Secretary Hepler and Commissioners,  
I am writing you to voice my disagreement with the decision to eliminate the Bow Hunter Education Requirement (regulation) in our State. History Please allow me to give a brief history of the program and my involvement with it since its inception. The "Bow Hunter Education" requirement was brought to the Department in 1992 by the bow hunters of the state through the South Dakota Bowhunters Inc (SDBI) in order to expand the bow hunting opportunities in our state, especially with the Elk seasons. SDBI, through this agreement, was to provide the management of the program while the Department was to provide logistical support and maintain the student registration records. The National Bowhunter Education Foundation Course was selected to be the course as they had the materials and support logistics needed and several founding members of SDBI were already Certified Instructors. (SD archery legend, Charlie Bledsoe of Sioux Falls,

being one of the first.) However, to become an Instructor there was never a requirement that they belong to SDBI. The State and SDBI sent out letters and posted notices to existing bowhunters recruiting them to become Certified Instructors. In March, 1993, the first Instructor Program was held in Pierre. I was a member of that original group of 60 individuals who became Instructors. Through the years of being involved in the NBEF Program, I was selected as "Instructor of the Year" in 1995, became a Regional Master Instructor, and for my last 10 years, I was the State Coordinator of the Program. During this time I have seen many changes within the program. When I first started teaching the Program, the classroom supplies were furnished but all the teaching aids were provided by the Instructors. Instructor teams used their own hunting equipment, purchased shot placement 3D targets, overhead projectors, treestands and ground blinds. Over the years, the Instructors used the money that was provided to them from the State in the form of \$3.00 per student per team to purchase additional materials and supplies. After the program had been in place for a few years and the teams were well established the State started providing the Teams with training materials, such as the "pin cushion" deer and bear shot placement table top targets.

#### Program and Requirements

**Instructor Requirements** - Prior to becoming a Certified Instructor, the Individual had to be a bow hunter with at least 3 years experience (this was waived by NBEF for the first class), have taken the NBEF course, attend an Instructor training course which was provided by either one of the Master Regional Instructors or the State Coordinator, and then the potential instructor must aid an established team in actually teaching 3 courses before becoming "certified". Once they were certified, they could either join an existing team or start a new Instructor Team, the Team approach is a mandatory requirement of the program- In order to maintain certification the teams had to teach at least one course every 2 years, but most teams did at least 2 courses per year with some doing as many as 5. All Instructors were to be evaluated by either the Regional Master Instructors or the State Coordinator every 2 years. All Instructors were strictly volunteers. Master Instructors - The Regional Master Instructors were appointed by the State Coordinator to serve as the Supervisor of the Program in their Regions which was set up in alignment with the Department's Regions. Each Region had at least one Master but could have as many as Masters whose functions included Instructor Certification, Regional Program coordination, and Instructor Evaluation. They reported directly to the State Coordinator and also to the

Department Coordinator as needed. In addition to their Master Instructor duties they still were expected to teach the required courses to remain certified. State Coordinator- The administration of the program fell directly on the State Coordinator. He was the person in charge of making sure that the Instructor Teams were in place, that they had the material support they needed, make sure that the Instructors were meeting the Course requirements, and was the person responsible for reporting to GF&P staff, GF&P Commissioners and SDBI to the Program goals, progress, and achievements. He also had direct access to the National NBEF Program Administrator. In addition, to the above duties and after the Elk Draw was held, it fell upon the State Coordinator to contact each successful drawn hunter that had not taken his NBEF Certification Course to make sure that he got into a course and that a course was available to him even if a team had to drive to a close location to provide the training. Most years, the number of successful applicants who still required a course ranged from 10 to 16 persons and to my knowledge, no one was ever not provided training. Course Requirements and Changes

The Student Requirement was originally meant for the First Time Bowhunter and all bow hunters between the ages of 12-16. Also any hunter who drew/ an elk tag must have completed an approved bow hunter education course. The Elk Hunter requirement has varied over the years, but it is in its original form now.

The Original Basic Course is designed to be a minimum of 8 hours of direct training by a certified team of 3 or more Instructors covering the mandatory requirements of the NBEF Program. Due to the length of the course the "Team Approach" is a mandatory requirement to provide the students with the best instruction possible as each instructor within the team had the experience to aid in the training. Every course had the same class materials and provided the NBEF Certified training requirements but Instructor teams set up their individual class schedule that best met their students needs. The training model is largely composed of Instructor- Student participation and hands on training with shot placement, blood trailing, and treestand placement and safety being provided. Over the years, Instructors led between 50 -60 Courses each year yielding approximately 100G1300 certified students. Online (distance learning) course Field Days were implemented to hopefully satisfy the

Department's wish to provide additional courses to students who could not attend a full 8 hour course- These courses were designed to allow the student to take an online portion of the course which covered materials and information typically covered in the classroom setting. After successfully completing the online course and printing out the Completion Certificate (which was valid for one year), the student was required to attend a 4 hour Field Day. Field Days were usually held on a Saturday afternoon at a local Outdoor Archery Range. Field Days were conducted in all regions depending on pre registration. These courses were set up to do the outdoor curriculum with a more hands on approach than was available in the normal classroom setting. During a Field Day, topics covered were range estimation, shot placement, blood trailing, and a large focus on

treestand safety. Students would first provide proof of their online Completion and upon completion of the four hour training the students would become certified. Over 5 years, 30-40 students per year took advantage of this type of training. However, on average, 50-100 students per year who took the on-line portion never registered nor completed the course via a Field Day. To replace the Distance Learning Course which was followed by a Field Day, the Total Online Course was implemented in 2014. It was implemented by the Department to make bowhunter education more convenient and accessible for people to get certified. As the name implies, it is a 100% online course that totally eliminates hands on education. Most existing instructors at the time felt the total online course could not meet the goals of the program particularly in reference to treestand safety, shot placement and game recovery. At the time the total online course was implemented, Instructors voiced their concerns about eliminating the hands-on style of learning. They did not feel they were listened to and therefore, most instructor teams dissolved after this option became available. Originally, the total online course was implemented as an 'option' for students. From the numbers I have heard since leaving as State Coordinator the on line program has averaged between 1600 and 2000 certifications annually. One of the concerns with the distance learning program is the absence of methodology to tell us if the training provided is adequate, especially in regard to treestand safety, shot placement, and blood kailing and game recovery. To my knowledge there were possibly +10 traditional classroom style courses held in 2017; mainly in Pierre, Rapid City, and possibly Watertown. Obstacles to inclusion of Bowhunter Education into Hunt Safe Program (from someone who also taught the South Dakota Hunt Safe course.)

1. Hunting with a bow is uniquely unlike hunting with any other piece of equipment. Bow hunters can be good firearm hunters, but firearm hunters are, by their choice of equipment and method, are not necessarily knowledgeable for bow hunting. Two examples of this would be distance from the quarry and shot placement. This is why NBEF Instructors were required to have a minimum of 3 years bow hunting experience prior to becoming an Instructor.
2. To teach treestand safety, you should have had treestand experience and most firearm hunters lack this knowledge as their methods of hunting differ greatly. The additional time to sufficiently teach this portion of the course would be extremely limited in the typical Hunt Safe class.
3. Proper shot placement, timing of the shot, and proper equipment to insure an ethical harvest with a bow and arrow, particularly on an animal as large as an elk, requires more in depth training than time allows in the normal Hunt Safe class. This training is critical to ensure 'marginal' shots are not taken and leave a bad mark on both bowhunting and the bowhunter. Many times young hunters or inexperienced hunters who without this training, make a marginal shot, may give up hunting entirely. I say this not only as an experienced Instructor but as a Father and Grandfather who has had all his children and their children take the courses! In conclusion, while I recognize that the Department Staff may see the Bowhunter Education Requirement as a deterrent to people becoming bowhunters and now their wish for more face to face training, expanding the Hunt Safe Program is not relevant to providing the new or inexperienced bowhunter the education they deserve. The concerns of the Department, in my opinion, have not changed from the first year I started teaching four NBEF courses per year in Sioux Falls in 1993. Until the Department is willing to put the responsibility of taking a course on the individual instead of the Instructors, some people will complain- In the 25 years since its inception, the Bow Hunter education program has had over 25,000 successful graduates in the state of South Dakota and by any measurable means I feel the program has been a success. To discontinue the program would be a great disservice to those 25,000 plus students and the Instructors who volunteered their time and resources to teach, As with any program over time, there are changes that can be made but dissolving the program (and regulation) is not one of them. In fairness to the Hunt Safe Instructors, it is not reasonable to expect them to adequately teach a topic about which they have little or no knowledge.

5/30/2018

**Marilyn Bentz**

**Rapid City SD**  
**mbentz@nbef.org**

**Comment:**

As I mentioned when you and I spoke last week, my schedule may preclude me from attending the upcoming South Dakota Game Commission meeting at Custer State Park. So please bear with me as I share some random thoughts I have had since our conversation.

The collective 2017 age data from all of our online students supports the belief that bowhunting appears to be an activity taken up later in life as a hunter matures and desires the greater challenge of bowhunting. Younger age data does occur but only in states where bowhunter education has been mandated for many years previous (e.g. Nebraska). Nationally significant age groups taking bowhunter education online: a. 9% are <16 years of age. b. 33% are 26-35 years of age. c. 21% are 19-25 years of age. d. 16% are 36-45 years of age. With the current age requirements for hunter education in SD, I am wondering if it is possible bowhunters may not have taken any form of hunter safety education if bowhunting is begun at a later age? The generational knowledge acquired since bow ed's 1992 beginnings may be lost without continual bowhunter education efforts.

Bowhunter education can indeed expose and educate youth to a different form of hunting (bow vs. firearm). And bowhunter education may well be what today's parents are looking for as an activity for their children. That is, a safe activity with structure and qualifies as a next step to an activity they are already engaged in....NASP. I know of one state that offers a combo course (online) hunter ed and bowhunter ed which exposes youth to bowhunting. Course completion requires a short 3-hour field day after which both certificates are received. I would also suggest that you look at ways of offering a bowhunter education certificate with other activities. Perhaps a next step BOW class. Most archery classes are very popular and many times are repeated by participants. Another activity at the outdoor centers could be a structured "how to hunt" utilizing staff over several days during the summer keeping in mind the new facilities which will be offered for archers in Rapid City. I would be interested in knowing the department's response to the following questions: 1. Have statewide bowhunter numbers gone down (or up?) since 1992? 2. What are the specific department goals for increasing bowhunter numbers and why? 3. Are other methods of hunting being explored for increasing hunter numbers? 4. What role do you foresee bowhunters having in the long range SD hunting model (5 years, 10 years)? 5. As a learning tool, why would bowhunter education be an impediment to new or existing bowhunters? In addition, please know that the NBEF would be willing to assist with whatever methods you may choose to promote bowhunting and bowhunter education. Please don't hesitate to call upon us.

**6/5/2018**

**Russ Roberts**

**St Onge SD**  
**wgo@mato.com**

**Comment:**

I have been involved in teaching hunter safety courses in some manner for almost 20 years so I know how important these courses are and how much they can educate hunters on many levels. I ask that you continue the bowhunter education requirement for archery licenses. Sending archers in the field less prepared and educated benefits nobody and is not good for the sport.

**6/5/2018**

**Matt Rippentrop**

**Hot Springs SD**  
**mattrippentrop@hotmail.com**

**Comment:**

The archery hunter education is worth having that currently SD GFP requires. Archery shot placement should be continued to be taught to new archers. If this requirement is removed, shot placement will get worse over time with more animals being wounded.

A similar comparison could be if the Highway's speed limits were removed. Would the vehicle accidents increase with no speed limit?

Will wounded animals from bad shot placement increase with no archery hunter education required anymore?

If you do decide to get rid of the archery education requirement, for a potential compromise could you please at least require the Hunt Safe Card as a replacement requirement for archery hunting?

Please consider not approving the removal of the archery hunter education. Thank you for your time and consideration.

**6/5/2018**

**Justin Broughton**

**Sioux Falls SD**

**Justin.Broughton@premierbankcard.com**

**Comment:**

I'm writing regarding the two archery proposals before the commission during the June meeting. I strongly oppose the removal of the bowhunter education requirements for SD bowhunters. Especially first time bowhunters and potential elk hunters. The NBEF courses provide an excellent foundation for new bowhunters to learn from mentors who have bowhunting experience and to learn bowhunting specific concerns that are not taught in the HuntSafe classes. Education specifically for archers can help reduce wounding loss and increase recovery rates and improve treestand safety in all participants. We currently have no issues with hunter participation levels based upon archery tag numbers issued, there is no sound reason for removing this requirement.

## 08. Retention of Accrued Preference Points

**5/7/2018**

**Daniel John Amen**

**Rapid City SD**

**dakotainc@gmail.com**

**Comment:**

I do support the Elimination!



**5/7/2018**

**Kelly Koistinen**

**Spearfish SD**  
**kkoistinen@fs.fed.us**

**Comment:**

The purpose of the Preference Point system is to give those who apply with preference points more chances to receive certain elk, deer, antelope, bighorn sheep, turkey and mountain goat tags over others. If you eliminate the 5 year time limit for those who don't apply with their preference, you are in fact, eliminating the advantage of the system. Do these people really need their preference points at all? They are sacrificing that right to having preference by not using it within 5 years. Tough break for being lazy!! Now then, the other folks who do have preference points during that same time period, and use it when applying for tags no longer have an advantage over others! Because you will be rewarding those too lazy to utilize their preferences within 5 years. What sense does this make? You would then be taking away that preference over other applicants by eliminating the 5 year limit. This is not fair to those of us who want to apply with preference. These are the things that the commission doesn't even think about when making all their proposals.

**5/8/2018**

**Kevin Bruzelius**

**Pierre SD**  
**kevin.bruzelius@state.sd.us**

**Comment:**

I agree that after five years, you have to wonder why they are even applying, and that would bring some sensibility to the hunter's that truly want to hunt.

## 09. Potential Adjustments to Snaring and Snare/Trap Marking Proposal from April Meeting

**5/7/2018**

**Russell Cambern**

**Sioux Falls SD**

**russell.camborn@gmail.com**

**Comment:**

I'm a pheasant hunter and never had any problems with this. We need the trappers out there for population control or there will be even less pheasants.

**5/7/2018**

**Lee Nelson**

**Rapid City SD**

**leemnelson@hotmail.com**

**Comment:**

No comment text provided.

## 09. Snaring and Snare/Trap Marking Proposal from April Meeting

5/12/2018

Kevin Thibodeau

Onida SD

tibs196@yahoo.com

**Comment:**

I believe this is an unfair resolution. We as trappers also fund the purchase and development of public lands. We have as much right to utilize this land as anybody else. A more reasonable solution could be the requirement to use relaxing locks. I personally have released pets from my snares with no harm done due to the use of relaxing locks. In my opinion the preservation of pheasant populations should be considered by a trappers removal of predators. Thank you.

5/12/2018

Kevin Thibodeau

Onida SD

tibs196@yahoo.com

**Comment:**

There seems to be no reason for this requirement. The only thing it may cause is the possible persecution of trappers by people who oppose our passion of predator control. Also, I have communicated with people who live in states that currently require trap tags. They greatly express their disgust with this law because of the added cost and difficulty keeping tags legible. Thank you

**5/12/2018**

**Steve Alverson**

**Chester SD**

**stevealverson@hotmail.com**

**Comment:**

I am in opposition to the public land and right of way snaring restrictions proposed. I have trapped in eastern SD for 50 years and have seen many changes. Farming practices have changed to the point where it has taken away habitat and snaring locations. Many fences are eliminated, ditches are filled in and crops are planted within a few feet of the road. Wetlands are burned and drained with the use of tile, thus no more habitat. The ditches that are left, and public hunting areas have been a big part of a trappers set location for many years. The proposal to shut down snaring in these locations until after pheasant season would eliminate a valuable tool in a raccoon and predator trappers arsenal. There is a very short window for a prime coon harvest. From mid november to usually the first week in december. This proposal would effect many trappers who pursue not only raccoon, but other predators like fox and coyote. And mink trappers who also use snares. These proposals have been considered due to a few hunting dogs being caught in a snare. Snares can easily be taken off a dog by the owner. Educating hunters is the key. Signs at public areas and few words in the hunting hand book to explain that snares may be set in these public areas is the solution. Not to take away the rights of hundreds of trappers, because of complaints by a few.  
Steve Alverson

**5/13/2018**

**Steve Cherkas**

**Edgemont TN**

**sacherkas@msn.com**

**Comment:**

I oppose making trapping more restrictive. From snaring perspective the fur is best Nov and Dec. Do NOT take this away. Nov 13 already too late. Move pheasant season up instead.  
I oppose requiring trap tags. Name gives activists ability to track you down and do things to harm you.  
Personal ID forces trapper to remove tags if trapping in other states.

5/13/2018

Larry- Rossum

Rapid City SD  
larry4609@gmail.com

**Comment:**

Dear commissioners,

I am writing in response to some recent proposals to our current snaring and trapping regulations. I have over 45 years experience of fur harvesting beginning with my first trapline run on a bicycle to creeks and ponds around Rapid City and progressing to long lines run all over many west river counties.

While we all regret the accidental catch of a hunters dog, the runaway emotional train always wants to put the regulations on the trapper even though these are isolated incidents. Essentially eliminating two months of snare use during the peak and prime fur time of fur harvesting is in my view an over reaction and not acceptable. The snare is an incredibly useful tool that we use and prohibiting its use would be like not allowing hunters to use to use their dogs while pheasant hunting. That would drastically change the pheasant hunt in the same way our fur harvesting would be greatly handicapped.

I believe some common sense education could go a long way on an issue like this one. Most dogs are trained to a leash and do not fight hard against a snare and simple manipulation of the locking device opens the snare right up for easy removal.

it also seem that these hunting dog incidents take place east river where the pheasant habitat is. There are several trapping regulations that vary from east river to west river and while I do not think the east river fur harvesters should lose their snaring opportunities during the pheasant season, I certainly do not think it is fair or logical to apply this restriction statewide where pheasant hunting is very limited or non existent such as the Black Hills and National Grasslands. Personally I would like to see our snaring opportunities on public lands west river return to year round like it used to be.

I've spent a lifetime pursuing South Dakotas fur bearers and it has taught me about hard work and responsibility as well as great memories and fun. My grandkids are now tagging along on the trapline and I see the excitement in their eyes as well. Please don't let the full burden and more restrictions fall to one group that will hinder their outdoor pursuits in order to solve an unfortunate isolated incident.

Thanks for your time!

Larry Rossum  
Rapid City

**5/14/2018**

**Tim Larson**

**Centerville SD**

**Beaverskinner484@gmail.com**

**Comment:**

I've been trapping for over 40 years most of my trapping is right a way trapping as I still have to work a full time job. I set up a trapline to check on the way to work and one on the way home, I do this for the limited time I have, im usually checking before 4am until usually 7 before work then 2 to 3 hours after, I do this because if I had to get permission and drive in every field I wouldn't be checking many sets with the time it takes. So if the public land snaring is banned until after pheasant season it would not be worth snaring, most coyotes will be rubbed most coons will be hibernating or rubbed it would mean the end of my trapping. A better solution would be to educate everybody that uses public land that their could be trappers right along with pheasant hunters, trapping most certainly helps the pheasant population. As far as trap tags I see no need for them as it's going to open up a whole new can of worms, anybody that's breaking the law will not have trap tags, but could steal a law abiding trappers trap or tag and set it illegally who's gonna get the blame, the name on the tag will I'll bet, so we don't need them. We need to educate people

**5/15/2018**

**Shane Simon**

**Nemo SD**

**kingofwildfrontier@msn.com**

**Comment:**

I am writing to express that I am opposed to the prohibition of snaring on public grounds until the end of pheasant season. I am also opposed to the requirement of placing name tags on traps as this accomplishes nothing toward public safety and is yet another unnecessary restriction and expense on trappers. I am also opposed to the unnecessary requirement to restrict the use of spring powered snares on game production areas and waterfowl production areas. It is my opinion that imposing such a restrictive set of proposals will have devastating results to the trapping community. Prime fur exists during these critical times and further restriction will not accomplish any reasonable safety to hunting dogs. As a hunter and trapper, should the unlikely event happen that a dog is caught in a snare you are right on the spot to see that your dog is caught up and you can release it safely before injury occurs. South Dakota is one of the last great outdoor places and restricting the trapping community is a step that is hard to reverse once it is in place and I do not support the idea that pheasant hunting should "take priority" over trapping or any other outdoor activity. As a disabled vet, I have served my country to ensure that all rights exist to law abiding, outdoor enthusiasts and hope that many generations to follow will be able to enjoy the same outdoor experiences that I participate in today. Thanks for your consideration and I hope you do the right thing and choose not to further restrict the trapping community!  
Shane Simon

**5/15/2018**

**Tim Larson**

**Centerville SD**

**Beaverskinner484@gmail.com**

**Comment:**

I oppose the use of trap tags and restrictions on snares I added comments earlier but it said other instead of opposing

**5/20/2018**

**Tracy Kaiser**

**Sioux Falls SD**

**tracyk39@outlook.com**

**Comment:**

My son Jared and our lab, Piper were hunting pheasants last fall on public land, when Piper walked into a snare trap. Jared could not go for help because Piper would have tried to follow him, and would've choked to death. He did not have his phone on him, so was prepared to stay with his faithful hunting dog in freezing temperatures. How could you just leave your dog you love to die? I have no doubt Jared could have possibly lost his life if a passerby wouldn't have heard him yelling for help, and stopped to help them. I can't believe these traps which are dangerous and easily walked into, are allowed on public land during pheasant hunting season. As a very concerned wife, mother of three sons and two Labradors that are all avid hunters, I ask that these proposed changes are enacted.

**5/20/2018**

**Dan Kaiser**

**Sioux Falls SD**

**kaiser39@msn.com**

**Comment:**

Based on the risk to those who hunt these public lands I believe this is a fair compromise to the trapping ensnaring regulations

**5/22/2018**

**Trevor Janssen**

**Sioux Falls SD**

**trevjanssen@hotmail.com**

**Comment:**

Let me start off by saying that I am a strong supporter of all aspects of outdoorsman rights, and am a huge supporter of trapping. While I don't participate myself, I reap the positive benefits while hunting multiple small game species. I also completely understand that in the grand scheme of things, we're in this fight together - we all need to work together to promote hunting, trapping, and fishing for future generations, and be good stewards of the public land that affords most of us the right to execute this privilege. That being said, I'd like to show my support for the new proposed amendments to the current trapping season with regards to public lands. It's only logical in my eyes to eliminate the overlapping seasons - safety always needs to come first, and we need to stand by that as outdoorsmen regardless of the issue. It does not make sense to allow unposted trapping of public lands for furbearing species, including coyotes, at the same time that pheasant hunters - and specifically their canine companions - are taking to the field. It's an accident waiting to happen, and already has - probably more so than any of us realize. While the proposed amendment may or may not be a perfect resolution, it's a positive step to protect both interests.

**5/22/2018**

**David Otten**

**Tea SD**

**davidotten999@gmail.com**

**Comment:**

We have more than just pheasant hunters in this state, we have deer, waterfowl and upland bird trappers. We all pay for this public land. Who gets the biggest share of it. Pheasant hunting brings in a lot of money.

Predator control is big in this state, we pay a lot of money controlling coyote. If we have to wait until pheasant hunters are done, what does that leave trappers? Picking up scraps. It's hard to trap or snare in the snow. Our pheasant hunters got to know they are not the only people out there. People got to realize they're not the only ones out there.

I know it only takes a few incidents to have things go bad from fishing to hunting, trapping etc. You only have to ask a land owner and hear what pheasant hunters have, too. Two wrongs don't make a right. Some other fixes I like could be requiring a sign or a flag to tell others that traps or snares are being used at the gate or within 100 yards. Trap tags work too.



**5/22/2018**

**David Otten**

**Tea SD**

**davidotten999@gmail.com**

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**5/23/2018**

**Steve Chilson**

**Florence SD**

**Comment:**

The Grass Lake Conservation Club at its last meeting discussed the possible changes being considered to the trapping regulations. We are in favor of requiring ID tags to all traps being placed on public lands and road right-of-ways. Thank you for taking our opinion into consideration as you make your decision.

**5/23/2018**

**Jerry Riedel**

**Watertown SD**

**Comment:**

I have been trapping approximately 70 years of my 76 ears of life, including 37 years with the Game, Fish and Parks as an Animal Damage Control Specialist at Watertown. I am in opposition to trap and snare tagging, as I want to avoid situations where one individual can steal tagging traps or snares, or just the tags, and then use them illegally, thus framing an innocent trapper. I am also aware that trapped animals will remove tags from traps and snares, thus giving the set the appearance of being illegal. I would also like to avoid situations where traps or snares are tampered with or disturbed by Conservation Officers or the general public when checking for tags on traps or snares. "IF" tags are approved please use a registered numbering systems and not names to avoid situations of confrontations. In reference to trapping and snaring on Public Lands I would favor leaving the regulations as is, with Public Land closed only to snaring until the 2nd Saturday of November. However, I would favor the prohibiting of snares with locks that are spring powered on all Public Land year round. I would favor allowing the use of dog proof traps, live traps, 4 inch body grip traps (110 conibear style traps) and colony traps during the entire trapping season. I would favor a regulations that would restrict larger traps and snare loop sizes for larger predators but would still allow for the harvesting of skunk, raccoon, fox, mink, muskrat, and weasel on all Public Land for the entire trapping season. I am sure the Commission and Staff will also take into consideration when setting any trapping regulations the amount of free predator and nuisance animal control the state receives from the private trapper. I feel the solution to the current trapping issue problems is EDUCATION! The trapper must be educated when making his trapping sets, his choice of equipment and time of year of placement of said set of respect dogs and dog owners and their right to use Public Land. Perhaps mandatory trapper education will be needed just as hunter safety courses are taught. The hunter must be educated to the fact there may be trapping equipment present on Public Land. The hunter should be taught how to release a trapped or snared dog without injury to the dog or hunter. The hunter should also be reminded of all the free predator and nuisance animal control the trapper provide. Various forms of education and are available that could be provided by the Game, Fish and Parks, South Dakota Trappers Association, Pheasants Unlimited, Ducks Unlimited and numerous Sportsman's Clubs through the use of internet contact, news media, Game, Fish and Parks Hunting and Trapping Guides, signs on Public Land, videos, public meetings and classes. Thank you for your time and considerations on these comments.

**5/23/2018**

**Dan Krogman**

**White River SD**

**Comment:**

For starters, I don't feel like I have a horse in this race, as all my trapping and snaring are done on private ground. I do feel like I need to support my fellow trappers that aren't as fortunate. As a long time trapper and snareman I think all three of your proposals are unwarranted. As for proposal one. Anyone that has caught and marketed many coyote knows that by Jan 15 coyotes are past prime and fur is breaking down. Trappers should have 85% of their coyotes taken by this date. How many pheasants and deer are saved by trappers taking the surplus of animals with snares and traps? A question not easily answered. Traps and snares are tools that unpaid trappers use to keep predators in check. It's hard enough for unpaid trappers to break even without putting a time restriction on doing what they love to do. Let alone the fact that coyotes and coon are nearly worthless by then. Also the fact that there are few pheasant hunters in the Black Hills and plains of SD. I feel education is the key answer here with dog hunters and trappers. Proposal #2 Tags on traps does absolutely nothing to protect any dogs or catch more coyotes. The trappers that use public land have along with the dog hunters have paid their fees. The trapper East River do not need anti hunter - trapper wacos knocking on their door harassing them. It's just an accessory trappers here don't need. Proposal #3 I am a member of WSDFHA. Out Accoc. may back this proposal but I can't. It's taken decades to get snares and traps the tools they are today. Why would you go backwards with non dispatch locks? Kill springs and locking locks are a giant step forward in killing coyotes not dogs. Any dog that's ben tied and broke to lead will not be killed by a dispatch snare. Break away devices and locking locks area huge advancement over the old locks that acted like a saw on a coyotes neck. I want my coyotes quickly and humanely killed if at all possible. Again any dog that has been lead broke or tied will be there wagging their tail. With any hunting and trapping things can and will go wrong. Hunters do get in hunting accidents. Young and inexperienced trappers and hunters are gonna make mistakes. I did. I've trapped and snared for over 50 years and try to keep my mistakes to the very minimum. It's all we can do. I once had a young turkey hunter shoot an Angus calf in the high weeds. Had a cousin get a horse shot and killed in place of a deer. You know they never did it intentionally. I believe hunters and trapper education is your best proposal.

**5/23/2018**

**Kenneth Lipp**

**Rapid City SD**

**Comment:**

The 1st I believe are unnecessary I'm 68 years old and have trapped for years and have never seen a hunter with a bird dog. We do not have many game birds in Western South Dakota or the Black Hills. I should clarify not seeing bird dogs, in the areas that I trap. If we could catch all the coyotes we might have a few birds but that will never happen!

**5/23/2018**

**Kenneth Lipp**

**Rapid City SD**

**Comment:**

The second I believe are unnecessary I'm 68 years old and have trapped for years and have never seen a hunter with a bird dog. We do not have many game birds in Western South Dakota or the Black Hills. I should clarify not seeing bird dogs, in the areas that I trap. If we could catch all the coyotes we might have a few birds but that will never happen!

**5/23/2018**

**Kenneth Lipp**

**Rapid City SD**

**Comment:**

I'm writing in regard to the possible loss of trapping in South Dakota with snares and a requirement to have all traps marked with personal ID and unique numbers. I just read the commissions three proposals and i agree with proposal #3 but am opposed to numbers 1 and 2. The first and second I believe are unnecessary I'm 68 years old and have trapped for years and have never seen a hunter with a bird dog. We do not have many game birds in Western South Dakota or the Black Hills. I should clarify not seeing bird dogs, in the areas that I trap. If we could catch all the coyotes we might have a few birds but that will never happen!

**5/23/2018**

**Darci Adams**

**Hartford SD**  
**dadams@humansociety.org**

**Comment:**

May 23, 2018

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

Dear Commissioners:

We oppose the trapping and killing of animals for fur pelts and trophies. Such exploitation causes needless and unjustifiable death and is, therefore, inconsistent with the aims of a humane society. Considering that, we urge you to support the proposal amending the trapping prohibitions in Chapter 41:08:02. These proposals offer commonsense updates to South Dakota's trapping regulations. These changes are necessary to reduce animal suffering, to protect unintended victims, and to provide accountability to citizens who have a public interest in healthy wild animal populations and a personal concern for the safety of their companion animals.

This proposed action would require traps and snares placed on public land and improved rights-of-way to be marked with information identifying the trap owner. South Dakota is one of only a few states that fail to require traps to bear information identifying the trap owner or the person using it. This lack of identification information makes it nearly impossible for law enforcement agencies to identify those who may be using traps illegally. Traps used exclusively on private property would be exempt from this identification requirement.

This proposal would rightly limit the use of inhumane snares and powered snares. All snares use a wire or cable loop that tightens around an animal's neck, body, or limb and causes extreme suffering, asphyxia, and even death. Killing snares are designed to kill by strangulation as the animal struggles against the tightening wire, often causing grotesque swelling and hemorrhaging of the head. Studies have shown that killing snares are ineffective at consistently capturing canids at the optimal neck location in order to ensure the quickest death possible. Less than 50% of canids captured by the neck in killing snares lose consciousness within 5 minutes of being captured; most suffer longer. Animals captured around the abdomen by killing snares may suffer from disembowelment. Restraining snares are intended to only hold the animal, but they often cause the animal pain, injury, and death when they malfunction. Some animals are hanged to death in these devices if they jump over a fence or branch in an attempt to escape. Animals caught in snares can die from exposure, dehydration, or starvation.

Snares capture "non-target" animals, such as imperiled species and pets. We don't know how many non-target animals suffer or die because trappers are not required to report these captures. However, in field studies, snares have caught non-target wildlife, birds, and dogs. In some studies, snares have been up to only 50% selective, meaning that one non-target animal was captured for each target animal captured. Snares are cheap and easy to make. Easily set in large numbers, these inconspicuous "land mines" may be abandoned on the landscape, leaving all animals vulnerable.

For the foregoing reasons we request your support for the amendments to Chapter 41:08:02 to update South Dakota's trapping regulations.

Sincerely,  
Darci Adams  
South Dakota State Director  
The Humane Society of the United States  
PO Box 733, Hartford, SD 57033

dadams@humanesociety.org  
P 605-595-4860  
humanesociety.org

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Papouchis, C.M. (2004). A critical review of trap research. In Fox, C.H. and Papouchis, C.M. (eds) *Cull of the Wild. A Contemporary Analysis of Wildlife Trapping in the United States*. Animal Protection Institute. Sacramento, California pp 41-55. Bang Publishing: Brainerd, Minnesota, USA.

Proulx, G., & Rodtka, D. (2017). Steel-Jawed Leghold Traps and Killing Neck Snares: Similar Injuries Command Change to Agreement on International Humane Trapping Standards. *Journal of Applied Animal Welfare Science*, 20(2), 198-203.

Proulx, G., Rodtka, D., Barrett, M. W., Cattet, M., Dekker, D., Moffatt, E., & Powell, R. A. (2015). Humaneness and selectivity of killing neck snares used to capture canids in Canada: A review. *Canadian Wildlife Biology & Management*, 4(1), 55-65.

Papouchis, supra note 1.

Iossa, G., Soulsbury, C. D., & Harris, S. (2007). Mammal trapping: a review of animal welfare standards of killing and restraining traps. *Animal Welfare*, 16(3), 335-352.

**5/23/2018**

**Jessica Betts**

**Oacoma SD**

**Jessinne@yahoo.com**

**Comment:**

My dads dog was caught in a trap while hunting public land. Thankfully he knew how to release him. If this were me, with any of my dogs, I would not have known how to release trap. Traps should be marked with owners info

**5/23/2018**

**Lori Lockman**

**Sioux Falls SD**

**Lolo2379@gmail.com**

**Comment:**

I fully support this effort and urge GF&P to do so also. Since SD is only one of a few remaining states that dont require trap id's, how can we expect law enforcement to know who is using them illegally? Plus this will protect animals who may fall victim to these traps. It's a win/win.

**5/24/2018**

**Jerome Eckrich**

**Spearfish SD**

**Comment:**

The proposal strikes me as reasonable, balanced and fair. I grew up in Aberdeen spending much of my time outdoors hunting a lot and trapping some. These days most of my hunting is on West River public lands. Times have changed since I was a kid. Private hunting land is now a luxury for many, including myself. Knowing which lands I share with traps and trappers is a safety issue for me and a simple courtesy. I respect the interests of trappers-many of whom I suspect appreciate the dollars earned off our public lands. The GFP proposal reasonably accommodates the interests of all who love tramping our public sloughs and gullies. Thank you.

**5/24/2018**

**Melissa John**

**Sioux Falls SD**

**Comment:**

I urge the SDGFP commission to support the proposal because South Dakota is one of only a few states that fail to require traps to bear information identifying the trap owner/user. This lack of identification makes it nearly impossible for law enforcement agencies to identify those who may be using traps illegally and it will protect unintended victims of trapping.

**5/24/2018**

**Sara Parker**

**Sioux Falls SD**

**sara.parker@perceptivemedia.net**

**Comment:**

I urge the SDGFP commission to support the proposal because South Dakota is one of only a few states that fail to require traps to bear information identifying the trap owner/user.

This lack of identification makes it nearly impossible for law enforcement agencies to identify those who may be using traps illegally and it will protect unintended victims of trapping.

**5/24/2018**

**Brenda Manning**

**Pierre SD**

**buzz\_brenda@yahoo.com**

**Comment:**

SDGFP Commission, please support the proposal as SD is a rarity when it comes to requiring traps to bear identifying information such as the trap owner/user. This lack of identification hinders law enforcement to be able to identify people who may be using traps illegally and this will greatly help protect unintended victims of trapping.

**5/24/2018**

**Janine Betts**

**Oacoma SD**

**janineinsd@yahoo.com**

**Comment:**

I urge SDGFP Commission to support the proposal because South Dakota is one of only a few states that fail to require traps to bear information identifying the trap owner and user . This lack of identification makes it nearly impossible for law enforcement agencies to identify those who may be using traps illegally and it will protect unintended victims of trapping.



**5/24/2018**

**Barry Betts**

**Oacoma SD**

**bioserve@midstatesd.net**

**Comment:**

I urge SDGFP to support the proposal as SD is one of just a few that does not require identity.

**5/24/2018**

**Sara Mart**

**Vermillion SD**

**sara.mart@usd.edu**

**Comment:**

I beg you to please support this proposal. I live near Clay County Park. My dog, Rex, went missing for 7 days this winter, during a week of extreme cold, snow & wind. He is never away from home overnight, so we assumed he had died. After 7 days, he returned home on his own, badly wounded by a snare trap. His entire neck was cut all the way around, with the worst part being his throat which was sliced 1" deep from ear to ear. The vet said the wound appeared to be 6-7 days old. We assume he was caught in the trap all week and released by the trapper who finally checked that trap after 1 week. His tracks in the snow came from the direction of the park, so we assume the trap was at or near the park. Please make trappers more accountable for their traps. I do not want this to happen to another pet, nor do I want a wild animal to suffer in a similar way. Makes me sick. Thank you for your consideration.

**5/24/2018**

**Sarah Taggart**

**Vermillion SD**

**sarahtaggart@outlook.com**

**Comment:**

"I urge the SDGFP commission to support the proposal because South Dakota is one of only a few states that fail to require traps to bear information identifying the trap owner/user. This lack of identification makes it nearly impossible for law enforcement agencies to identify those who may be using traps illegally and it will protect unintended victims of trapping."

5. Click I'm not a robot, follow instructions and hit SUBMIT - that's it & you will be on the record with the SDGFP Commission.

**5/24/2018**

**Terry Krsnak**

**Rapid City SD**

**tjkpj@msn.com**

**Comment:**

The proposed snare restrictions are an over reaction to the hunting dog incident. If the restrictions are enacted, they will curtail predator control because fur quality will not be worth the effort after pheasant season ends; and in the era of diminished habitat predator control becomes more important. Also, what has the additional regulations of name tags on each snare or trap got to do with any of this?

**5/24/2018**

**Roberta Rotherham**

**SD**

**Comment:**

No comment text provided.

**5/24/2018**

**Becky Jensen**

**Meckling SD**  
**rkjensen@usd.edu**

**Comment:**

I urge the SDGFP commission to support the proposal because South Dakota is one of only a few states that fail to require traps to bear information identifying the trap owner/user. This lack of identification makes it nearly impossible for law enforcement agencies to identify those who may be using traps illegally and it will protect unintended victims of trapping.

**5/24/2018**

**Casey Mart**

**Vermillion SD**  
**Casey.mart3@gmail.com**

**Comment:**

I urge the SDGFP commission to support the proposal

**5/24/2018**

**Abby Protzman**

**Norfolk NE**  
**nebraska.rose@gmail.com**

**Comment:**

No comment text provided.

**5/24/2018**

**Kelly Saunders**

**Vermillion SD**

**Comment:**

sd is one of the only state that does not make trappers identify their traps.

**5/24/2018**

**Gina Mairose**

**Vermillion SD**

**gina.mairose@usd.edu**

**Comment:**

I urge the SDGFP commission to support the proposal because South Dakota is one of only a few states that fail to require traps to bear information identifying the trap owner/user. This lack of identification makes it nearly impossible for law enforcement agencies to identify those who may be using traps illegally and it will protect unintended victims of trapping

**5/24/2018**

**Colleen Evans**

**Vermillion SD**

**hupiper82@gmail.com**

**Comment:**

I urge the SDGFP commission to support the proposal because South Dakota is one of only a few states that fail to require traps to bear information identifying the trap owner/user. This lack of identification makes it nearly impossible for law enforcement agencies to identify those who may be using traps illegally and it will protect unintended victims of trapping.

**5/24/2018**

**Kristine Brady**

**Vermillion SD  
klbrady71@yahoo.com**

**Comment:**

I urge the SDGFP commission to support the proposal because South Dakota is one of only a few states that fail to require traps to bear information identifying the trap owner/user. This lack of identification makes it nearly impossible for law enforcement agencies to identify those who may be using traps illegally and it will protect unintended victims of trapping.

**5/24/2018**

**Holly Haddad**

**Vermillion SD  
holly.haddad@usd.edu**

**Comment:**

I urge the SDGFP commission to support the proposal because South Dakota is one of only a few states that fail to require traps to bear information identifying the trap owner/user. This lack of identification makes it nearly impossible for law enforcement agencies to identify those who may be using traps illegally and it will protect unintended victims of trapping.

**5/24/2018**

**John Kidney**

**Vermillion SD  
Jake.kidney@gmail.com**

**Comment:**

Hours or days of suffering for animals domesticated or wild is cruel and should not be practiced.

**5/24/2018**

**Robin Talsma**

**Sioux Falls SD  
Bubaloo2@hotmail.com**

**Comment:**

No comment text provided.

**5/24/2018**

**Judy Zwolak**

**Vermillion SD  
judithzwolak@gmail.com**

**Comment:**

South Dakota is one of only a few states that fail to require traps to bear information identifying the trap owner/user. This lack of identification makes it nearly impossible for law enforcement agencies to identify those who may be using traps illegally and it will protect unintended victims of trapping

**5/24/2018**

**Deborah Dodge**

**SD**

**Comment:**

I urge the SDGFP commission to support the proposal because South Dakota is one of only a few states that fail to require traps to bear information identifying the trap owner/user. This lack of identification makes it nearly impossible for law enforcement agencies to identify those who may be using traps illegally and it will protect unintended victims of trapping.

**5/24/2018**

**Morgan Hower**

**North Sioux City SD**

**Morgan.hower@yahoo.com**

**Comment:**

No comment text provided.

**5/25/2018**

**Maggie Peterson**

**Vermillion SD**

**Maggie.r.peterson@gmail.com**

**Comment:**

My dog is a victim of illegal trapping and was in a trap for a week unnoticed by the trapper

**5/25/2018**

**Brenda Moss**

**Vermillion SD**

**1blmoss@gmail.com**

**Comment:**

I run the "Vermillion-Southeast South Dakota Lost and Found Pets" group on Facebook. During the last trapping season, two dogs near Vermillion were caught in snare traps. In one case, the trapper checked his trap as required by law, and the dog was released without serious injury. However, in another case, the trapper did not check the trap as required by law, and the dog remained in the trap for approximately 7 days (Clay County Park). This dog suffered severe neck wounds and required extensive veterinary care.

I urge the SDGFP commission to support the proposal because South Dakota is one of only a few states that fail to require traps to bear information identifying the trap owner/user. This lack of identification makes it nearly impossible for law enforcement agencies to identify those who may be using traps illegally and it will protect unintended victims of trapping.

**5/27/2018**

**Jared Kaiser**

**Sioux Falls SD**

**pipersd15@gmail.com**

**Comment:**

I fully support the updated trapping regulations. A hunting dog's life should never be in jeopardy over the slim possibility of trapping a coyote. I support trapping, but not on public land during pheasant season. This is a common sense update to the regulations and if not passed many dogs lives remain in jeopardy.



**5/28/2018**

**Cheryl Bowden**

**Hot Springs SD**  
**bowdens@gwtc.net**

**Comment:**

I oppose the first and second proposed changes to our trapping regulations. I want the snaring on public lands starting date to remain Nov. 13th. I oppose trap tags as it is a burden on trappers and serves no useful purpose what so ever.

**5/28/2018**

**Jim Sparks**

**Spearfish SD**  
**Jjsparks@rushmore.com**

**Comment:**

Prefer the law stays as it currently is.

**5/29/2018**

**Dennis Morton**

**Rapid City SD**  
**bayushisoshu@gmail.com**

**Comment:**

I do not support the proposed restrictions on the use of snares on public land. Pheasant hunters should not be shown preference in regard to public land use. Thank you for considering my input.

**5/29/2018**

**Vincent Logue**

**Oelrichs SD**

**vjlogue@outlook.com**

**Comment:**

Proposal #1: I oppose the proposal to extend the prohibition on use of snares on public lands and improved rights of way. It would take almost 2 months away from snaring time away and would end about the time that furs are losing their prime. Public land should be shared by all taxpayers and not just one group. This proposal would include areas in South Dakota that have no pheasant hunting such as forest service, BLM and Buffalo Gap Grasslands. There is no consideration for pheasant hunters to take precautions for their animals.

If in fact the hunter is in control of the dog it should only be a few minutes that the animal may be in a snare. A simple pair of inexpensive cable cutters, such as trappers use, in the hands of a pheasant hunter can insure safe, stress free removal of the animal from any snare that it may get entangled in.

Proposal #2: I oppose the creation of a new administrative rule requiring all traps and snares placed on public lands and improved rights of way be marked with owner's name and address or personal identification number. This rule would solve no problems and would incur extra expense for the trappers of South Dakota. This rule could be used as a means to harass a trapper if anyone was so inclined. A identification tag on the snare would not have kept the dog from getting caught or assisted in removing the dog from the snare. Once again a pair of cable cutters, which are easily carried in a pocket, would have made removing the dog from the snare a lot easier and less stressful for both dog and owner.

Proposal #3: I support the proposal banning the use of springs or other powering devices that hold a snare closed on snares used on the game production and waterfowl production areas above water yearround. I believe it is in the best interest of both trappers and hunters sharing public lands. It is notable that the snare that the dog was caught in last December was not equipped with a dispatch spring.

**5/30/2018**

**Larry Bowden**

**Hot Springs SD  
bowdens@gwtc.net**

**Comment:**

I strongly oppose items one and two in the current proposal. To restrict snaring on all public lands thru the end of pheasant season is to much. Trappers have the right to use public land just as much as hunters. Lots of west river public land doesn't even have pheasant populations. The term public land is to broad. Trap tags serve no purpose and are just an added expense and headache for the trapper. Trappers provide free predator control which enhances game and bird populations. Why doesnt GF&P acknowledge this and support the trapping community instead introducing unnessary regulations that will increase predator populations? Increased predator populations which will consume more of our already dwindling pheasant population. Trappers provide a valuable service, why not work with us instead of against us?

**5/30/2018**

**Charles Kelsey**

**Hot Springs SD  
ctkelsey@earthlink.net**

**Comment:**

I strongly oppose the current, seemingly useless but certainly impossibly restrictive proposals #1 (prohibition on snares through pheasant season) & 2 (marking traps with owners ID), that will eliminate or severely restrict trapping on PUBLIC LANDS during a large portion of the season that fur-bearers are in prime condition, and impose additional useless, and cumbersome trap tagging regulation. PLEASE DO NOT LET THESE TWO PROPSALS PASS! THANK YOU. SINCERELY, CHARLES KELSEY

**5/30/2018**

**Michael Morris**

**Henley MO**

**ufc.moose@yahoo.com**

**Comment:**

Your trappers pay taxes too and have just as much right to trap as the bird hunters have to hunt birds.

**5/30/2018**

**Daniel Turbak**

**Reville SD**

**turbakda@hotmail.com**

**Comment:**

It is my understanding that in the last 15 years there are no instances of a dog being killed in a snare in South Dakota. Why try to regulate something that isn't a problem? Dog owners should simply be made aware that traps and snares are potentially on public land and they should prepare themselves. If a dog bites somebody on public hunting land are we going to ban dogs from being on the public land?

**5/30/2018**

**Lesel Reuwsaat**

**Creighton SD**

**leereuwsaat@yahoo.com**

**Comment:**

I strongly oppose any change to the current regulations in place. Restricting the use of these PUBLIC LANDS through the end of pheasant season has only one party in mind. These grounds are for all sportsman to use and use equally. As far as trap tags go, these do not do anything to solve any of the issues at hand. The SD Game and Fish pays a wage and benefits to the state trappers to help with damage control. The SD recreational and professional trapper provides this service to the state and other sportsman at no cost. We help protect and facilitate healthy wildlife opportunities for all sportsman. Don't regulate us more than we already are!

**5/30/2018**

**Mandi Reuwsaat**

**Creighton SD**

**mandireuwsaat@yahoo.com**

**Comment:**

No comment text provided.

**5/30/2018**

**Tanner Opetize**

**Watertown SD**

**Comment:**

Who's idea was this? This is the perfect example of liberals making laws that do nothing more but create additional laws that are unneeded. South Dakotans are better than this, if anything we should be allowing more trapping and snaring to occur, not take it away. I spoke to 37 pheasant hunters and none of them are in support of any of these proposed changes. When anti-hunting groups support a commission rule, commissioners should be asking themselves if they are making a decision with the best interest of sportsmen in mind. I urge you to revoke this entire proposal. Thank you.

**5/31/2018**

**James Hanley**

**Cresbard SD**

**jphcar5@hotmail.com**

**Comment:**

This comes about because of a hunter's dog being caught in a snare / said animal turned out fine. The 3 proposals would not solve a problem that real does not exist.. A. because a K9 can be released from a snare with no harm to k9.. By implementing these restrictions I feel it would cost the state a lot of money first to implement it and second to the money coming into the state from pheasant hunting. If the predators are not kept in check. In part by snaring the pheasant hatch will be down and then the pheasant number thus less hunters coming to spend their dollars THIS would TOTALLY affect the state's economy ..so I wish the law to remain as is on snaring ...

**5/31/2018**

**Jason Kleist**

**Highland WI**

**kleist.jason1991@gmail.com**

**Comment:**

I strongly oppose changes 1, 2, and 3. Restricting snaring on public lands through the end of pheasant season is too long. Not all public lands have pheasants. Restricting snaring on public lands could cause an increase in predator populations.

**5/31/2018**

**Dale Halling**

**Bryant SD**

**aaapurewater@yahoo.com**

**Comment:**

I have been a life long trapper and a member of the South Dakota Trapping Association.

I oppose the changes you are wanting to make for snaring in the road right away and public hunting and trapping areas. Also, I would not like to have to put name tags on any traps or snares.

Trappers catch many animals that consume the eggs of pheasants, ducks and geese. By doing this I feel all trappers are doing a service for the SD wildlife.

**5/31/2018**

**Marvin Halls**

**Hot Springs SD**

**tuffhalls@outlook.com**

**Comment:**

I oppose any changes to trapping regulations concerning public land.

**5/31/2018**

**Travis Hymans**

**Lake Norden SD**  
**tkhymans@itctel.com**

**Comment:**

In regards to the proposed trapping regulations, I don't agree with them. The trapping tag proposed is an unnecessary expense and easy for thieves to steal traps and reset illegally to knock out competition. It also makes it possible for anti-trapping advocates to get a trappers address and harass them. It does nothing to promote legal sets, a person making an illegal set won't put a tag on anyways. And the proposed ban on snaring until the end of pheasant season basically cuts out snaring for raccoon's of which are one of the hardest on pheasant eggs. With low pheasant numbers, will the season for pheasants be shortened?

**5/31/2018**

**Enoch Pashby**

**Box Elder SD**  
**enoch\_pa@yahoo.com**

**Comment:**

Public ground should be available for the use of all legal outdoor recreation. Sportsmen who devote their lives to trapping or snaring should not be regulated out of the public grounds because of the big money that pheasant hunting brings to the state. The bottom line is this, it is the responsibility of the hunter to ensure the safety of his dog. We should not be punished so that pheasant hunters don't have to watch their dogs.



**6/1/2018**

**Tyler Kari**

**Bison SD**

**relyt1996@hotmail.com**

**Comment:**

I am strongly opposed to all of the proposed changes to trapping and snaring in our state. The problems they claim to be addressing are literally non-existent. No dogs have been killed in the state by being caught in a snare and identification adds another set of hoops for the law abiding citizen to jump through. Trappers should have the same opportunity to use public land as everyone else! One complaint should not affect all of South Dakota's trappers. I strongly urge the commission to properly educate themselves about trapping and snaring as any intelligent individual could see that these proposed changes are unnecessary.

**6/1/2018**

**Todd Chamley**

**Trent SD**

**karla-todd@goldenwest.net**

**Comment:**

These proposed changes, shows how one sided the commission looks at its constituents. How is it fair to cater to one group of sportsman, while throwing another group's privileges aside. If you want to address rule violations, I would love to see the number of ROW violations committed by "road hunters" vs trappers, I can assure you it is not even a contest who violates more laws. But there is no way would our state even mumble the notion of restricting the hunting of ditch parrots rights. By no means would I ever want to see hunting regs changed, I'm simply pointing out the contrast of thoughts. Once we allow some of our rights to be taken, from that point forward others see a weakness and we will be expected to cater to every whim that is brought forward from that day on. Give an inch, they will always try for a mile next, you can count on that!

**6/1/2018**

**John Hauge**

**Deadwood SD**  
**jdhaug44@gmail.com**

**Comment:**

I am writing in support of the proposed rule to require all traps to be labeled with the owners ID. This is an idea that needs to be implemented and I thank you for proposing it. Please implement it.

**6/1/2018**

**Mark Steck**

**Canton SD**  
**dakotalinemark@yahoo.com**

**Comment:**

Dear Commissioners and Secretary Heppler,  
Reason: Snaring regulations

I am opposed to the proposal (#1) banning snares from all public lands during pheasant season. It is far too broad regarding public lands. I see this as an anti-trapping bill that pits sportsman against sportsman. Furthermore I find it odd in the way this proposal has been championed. It is not a grass roots effort by bird hunters, nor is it a recommendation by the division of wildlife. As for the tagging of traps on public lands (#2), I am opposed. Again I find this perplexing in its genesis and rational.

**6/1/2018**

**Mark Steck**

**Canton SD**

**dakotalinemark@yahoo**

**Comment:**

Proposal #3 which prohibits dispatch type snares on GPA and WPA's a decent rule and should be common sense among trappers. I can support this rule yet find myself wondering if this compromising with what appears to be an assault on South Dakota freedoms. Despite these thoughts I can support #3. Thank you for allowing me to bring my dog Sadie to the last commission meeting. I do feel education is key to these issues. I also think there should be a mandatory trapper certification course.

**6/1/2018**

**Mark Smedsrud**

**Hartford SD**

**smedsrud@unitelsd.com**

**Comment:**

I am writing in opposition to the current proposal to change snaring regulations on public land in South Dakota.

Coyote, Fox and raccoon are at their peak fur quality from early November to mid December. The current proposal prohibits the effective harvest of these animals when the fur is at it's best quality.

Predators need to be harvested/managed in South Dakota to keep populations in balance. This proposal greatly hinders that effort.

I am a retired Conservation Officer/Supervisor and worked 26 years in wildlife law enforcement for GF&P. I also worked for the GF&P as a Animal Damage Control trapper. I am a life-long trapper and have used snares for many years. I know for a fact that the incidents of dogs caught in snares is minimal every year. This restrictive proposal is not a fair or competent solution to a relatively small problem. Education is the key to this issue. Pheasant hunters who use dogs need to be educated that snares are used on public lands. Then, they need to carry a quality cable cutter which can be purchased for \$10. In the remote chance that their dog is caught in a snare they can simply cut it off and be on their way. Veterinarians always recommend that dog owners carry a basic first aid kit for their dog in case they are cut or injured while hunting. A cable cutter is just another basic part of that kit to be carried during a hunt.

I have had two hunting dogs injured fairly seriously in the past while hunting pheasants on public land. Both dogs were cut by old abandoned barb wire fences through cattail sloughs. Both required stitches and veterinary care. I did not blame GF&P or demand that all abandoned fence be removed from public land. I accepted it as a possible risk while hunting.

If hunters are aware of the existence of snares they can be prepared in the remote chance their dog encounters one and handle it as a minor inconvenience and not an issue to cause panic.

I am neutral on the trap tag issue. As a lawful trapper I have nothing to hide. There are still a number of states that do not require trap tags. South Dakota has always been a state where Government regulation is kept to a minimum. I would like to see it stay that way.

**6/1/2018**

**Charlie Bode**

**Scotland SD**

**Comment:**

At my age 67 I have saw and heard things but "common sense" is not common any more. I vote no on trap tags, because other folks take your traps and put them where they shouldn't be. Most of my snares are on public lands ect. That's where the coyotes live when the crops are gone or being taken out. Without these tools i think the cattlemen of SD would suffer to put more restrictions is not need. As for dispatch snares on GPA grounds not needed. Pheasant season runs long. I feel we have got a long good and with common sense take there dog out of snare. Keep on hunting. I have caught lots of dogs in snares there happy to see me. Thanks for reading give it some thought.

**6/1/2018**

**Marlin Ramse**

**Custer SD**

**Comment:**

Concerning your latest proposal on snaring! How can you justify closing off so much land for so long a period for the complaint of one or a few bird hunters? Trappers should have as much right as the bird hunters. I'm sure you are catering to the side with the money. What has snare springs and traps tags got to do with the hunters complaint? The trappers do a good service to the bird hunters by killing a lot of predators that feed on the birds then young and nests, you are just taking the sport and livelihood away from a large group of sportsman. The Black Hills and a lot of the National Grasslands has no pheasants for hunting, but you wish to penalize them too. All these regulations are unnecessary it's just more rules to ad to your already over regulated regulation book. Please think about all the sportsmen not just the few! I am an 82 year old trapper that to see new ready and regulations that are trying to shut down our sport!

**6/1/2018**

**Gregory Pettersen**

**Madison SD  
Oldgreg82@gmail.com**

**Comment:**

This would be Devistating to my type of trapping. I don't trap much on public lands but road right of ways and ditches are 90% of my trapping out of respect for pheasant hunters with dogs I usually stay out of public land until after January 1 but I do trap the ditches around them which are usually my most productive areas and I believe it does help the hunters in the public lands I think some form of education for young trappers would not be a bad idea because people with experience usually place snares or traps to avoid these situations at all costs

**6/1/2018**

**Mike Mcgillivray**

**Madison SD  
mightymac1515@gmail.com**

**Comment:**

Hello everyone, I would just like you to think about the topic of the road trapping restrictions, I trap hundred miles of road ditches through the heart of prime pheasant hunting country, and have zero issues with accidental catches. Don't let a few uneducated trappers ruin it for the guys that do things correct. Reducing the number of predators increase pheasant numbers and putting road trapping restrictions will decrease the harvest of the predators that prey on pheasant and nesting upland game birds. I have several land owners that run pheasant hunting operations request that I use snares on their land to reduce predators. Non lethal snares set correctly without entanglement are non harmful. Pheasant hunters need to share the land resources with trappers to help build bird populations back to what they use to be. If this purposed laws are passed, I'm going to consider selling my equipment and taking a new hobby up in my life. Please vote against the proposed regulations. Look at some interests other than the pheasant hunters. Make pheasant season end December 1 if you want to install new regulations on road trapping. I understand some people need to be educated about the do and don'ts of road trapping. I would volunteer my time to be an instructor for this class, if we didn't put more regulations on trapping public right of ways.

In closing please don't forget about the little guy that doesn't bring millions of dollars into the state. One dog snared on a public shooting area that had that snare shot off it, shouldn't make laws change. Lets keep South Dakota great and vote against additional regulations on road trapping!!!!

Thank you

**6/1/2018**

**Bill Wick**

**Sioux Falls SD**

**Comment:**

I'm writing today on behalf of my pheasant hunting party of 13 gentleman that have hunted public lands for pheasants with dogs for the past 23 years. It has been an amazing ride and we have hunted all across eastern South Dakota almost exclusively on public land. We have only encountered traps a handful of times and when we did, never had any issues and respect the men that choose to enjoy that outdoor activity and that we share the public lands with. Honestly, our group wishes there was more trappers out there. We all paid to open these lands for outdoor pursuits and our group of 13 ask s you to reject this proposal. We do not want a commission that makes rules due to one isolated incident. We want to keep trappers on our public lands so we can continue to enjoy South Dakota bird hunting. We respectfully request the commission to cancel this proposal and listen to the sportsmen that pay the bills, not some dog walker or anti-hunters that want to take away this important management tool.

**6/2/2018**

**Jerry Herbst**

**Pukwana SD**  
**philotto@midstatesd.net**

**Comment:**

This was brought about by a dog owner who's dog was caught in a snare and was not hurt so what is the point then? Educate yourself on what a snare is and how they work, in the past I have talked with people that should know how they work but had no interest in learning about them. Talk with your State trappers they are the Pros they use this equipment every day!

**6/2/2018**

**William Winslett**

**Pierre SD**

**195Pilot@gmail.com**

**Comment:**

Regarding the proposed rule changes to trapping of public land in South Dakota

proposed rule change on snaring on public land after pheasant season

1. Millions of acres of non pheasant habitat
2. After January 1st many parts of state are covered in snow making access impossible
3. Relative small trapping community, restriction would discourage trapping in the State

requiring trap ID tags would cause undue paperwork and added equipment

**6/2/2018**

**Shirley Winslett**

**Pierre SD**

**sdgirl42@gmail.com**

**Comment:**

millions of acres restricted not pheasant habit

trap tags undue equipment



**6/2/2018**

**Cory Ferguson**

**Rapid City SD  
hplainsd1@aol.com**

**Comment:**

I support the proposed rule to require owner IDs on traps/snares placed on public land and improved road right-of-ways.

I want the Game, Fish, & Parks Department to know who owns the traps/snares. 43 other states require trap IDs.

Why should trapping happen, without regulators knowing who owns and set the traps on our public lands? How can the laws be enforced without some type of identification?

I also support extending the time for prohibition on snares on east and west river public land and public improved road right-of-ways by a few months in the late fall/winter. Currently it is prohibited May to November. This change is to prevent accidental snaring of hunting dogs during pheasant season. I also support the ban forbidding certain types of snares that forcibly hold snares closed on Game Production and Waterfowl Production Areas.

South Dakota's current snaring restrictions inadequately reduce harm to snared animals. Animals can be slowly strangled or choked, hung, or other body parts such as abdomen can be encircled.

I am in favor of increasing the time-of-year restrictions on snaring animals.

Trapping/snaring reform is about reducing cruelty to target and non-target wildlife or pets accidentally snared. Animals can be left in snares/traps for too long. Animals are without water or food, perhaps exposed to extreme weather, perhaps injured by trap/snare device, while in stress and pain or harassed by predators for many days. They may die in the trap/snare. Non-target animals may not survive if released. Many states require a 24 hour trap check time, but not in SD.

Thank you proposing these changes and I hope that there are favorable outcome concerning these crucial issues.

Thank you,

Cory Ferguson

**6/3/2018**

**Roger Auch**

**Brandon SD**

**auchden@alliancecom.net**

**Comment:**

Many types of public land across the USA have to balance multiple use by various groups. Sometimes these uses may appear to be in conflict with each other thus requiring wise management of said land that don't favor one group over another. Bird hunters with dogs should not be the only voices heard in the management of public land in SD. Trapping can and has for a long time co-existed with hunting on public land. Snares are not lethal to hunting dogs or any more injurious than barbed wire fences. When trappers pay for a trapping license in SD, some of our money goes to buying and maintaining public land. My trapping license fee shouldn't be used to block me from effectively taking furbearing animals at the peak of fur quality just because an occasional bird hunter maybe have to get his dog out of a snare (really not that hard). Snaring is one of the most effective ways to catch coyotes and I suspect that predator numbers will increase on public land without snaring and thus negatively impact game bird numbers. Same is true with public ROW. The current snare regulations is that a snare can't be attached to a fence without the owner's permission and well as trapping with 1/8 mile of occupied dwellings and such without permission. These current regulations are good enough, how many problems do you really have with dogs in snares...? State-wide law shouldn't be created just because of a handful of bird hunters with dogs get upset once and a while. You, as the commission, are supposed to represent the entire state outdoor users, not one specific sub-group. Perhaps hunters need to educate themselves on trapping. Snares are not the enemy...

**6/3/2018**

**John Almquist**

**Watertown SD**  
**jcalmquist@aol.com**

**Comment:**

Dear commissioners,

South Dakota public lands were purchased and managed by sportsman's dollars. Therefore, the management of these public lands should include all user groups including trappers. The incident of the snared dog on public land is a reminder that accidents do and will occur with any outdoor activity. Whether it be hunting, trapping boating, hiking, snowmobiling, camping, cross-country skiing or any number of activities it is inevitable that accidents do and will occur. It is something that we all must realize when engaging in outdoor activities, and when accidents do occur we need to do our best to minimize in the future the problem in realistic ways. The proposal to eliminate snares on public lands and public right of ways is not a viable solution. Trappers play an important role in eliminating predators that prey on small game birds. Snares are a very effective method of harvesting fox and coyotes. Restricting trappers in the use of snares on public lands would have an adverse effect in trying to reduce predator populations while at the same time trying to maintain healthy bird populations for hunters. However, I would be in favor of possibly restricting the use of the dispatch snares on east river public lands until after the close of the pheasant hunting season. But allow the use of snares with deer locks on all public lands and right of ways beginning on a designated date similar to would we have had in the past few years.

Most hunters are very unaware that trapping activities take place on public lands in SD. The GFP needs to do more to educate hunters about trapping. The present GFP Hunting and Trapping manual does not mention that trapping as an activity on public shooting areas. Also, no word mentioning trapping is written on public signs to inform hunters that trapping is allowed on the public land.

In regard to trap tags. I personally would not want anyone including a SDGFP CO to be inspecting my trap to see who the owner of the trap is. In my opinion that is trap tampering- a regulation that we currently have in rule book. Trap tags would also be just another cost burden to many trappers. Traps, baits, lures, equipment today are very expensive. Adding trap tags would just add another expense factor especially to younger trappers wanting to get started. Trap tags would encourage the so called bad apples in the bunch to remove tags from legal sets or steal the traps and relocate the trap in another area. This would only create another law enforcement problem that we do not need. Trap tags would serve no purpose in law enforcement, preventing illegal trapping or preventing non-target catches. Simply said they would only be a burden to trappers who obey the rules and regulations.

Thank you  
John Almquist

**6/3/2018**

**Kenneth Mcdonald**

**Elk Point SD**

**traci.holmquist.briarcliff.edu**

**Comment:**

No comment text provided.

**6/3/2018**

**Julie Anderson**

**Rapid City SD**

**signsofhope@rap.midco.net**

**Comment:**

I would respectfully request as a resident of South Dakota to ban all trapping, as this practice is extremely cruel and kills or maims any animal that get ensnared. To make this practice an acceptable form of income and/or predator control is unethical and needs to be abolished. No animal deserves this tragic fate and every commission member should be required to watch the death that a trapped animal succumbs to before dismissing this request. I support this amendment only because there is no other choice available to me.

**6/3/2018**

**Dave Skeide**

**Webster SD**

**Cloey@itctel.com**

**Comment:**

The public land is for everyone to enjoy, hunters trappers, fisherman. We as trapper,s already have restriction,s on when we can set snares on public land.and now you want to restrict us even more? We the trappers assn, and the state trappers can show the people who hunt with dog,s how to remove a snare from a dogs body. Thank you for listening .

**6/4/2018**

**Craig Parkhurst**

**Armour SD**

**goodforgoose@yahoo.com**

**Comment:**

I am opposed to the requirement of trap tags on traps and snares. I believe that they constitute an unnecessary expense and provide addition opportunity for trappers to be harassed or entrapped by problems such as tags falling off traps, etc.

I am also opposed to any restriction of snares on public lands.

**6/5/2018**

**David Love**

**Custer SD**

**djlove@gwtc.net**

**Comment:**

We believe that your proposal to require owner identification on traps is a step in the right direction. It makes no sense to enact laws regulating the use of traps unless those laws can be enforced. And if you have no way of learning who is trapping illegally you cannot enforce the laws. Thank you for your dedication to duty.

**6/5/2018**

**Teah Homsey-Pray**

**Sturgis SD**

**teahhomsey@yahoo.com**

**Comment:**

I support the measure of identifying traps thus making trappers hopefully more responsible.

In a society as sophisticated as ours I truly question the use of this barbaric means of killing.

Many other countries have banned the use of inhumane traps and leg holds.

I urge you to look at this "sport"

and really question what we are promoting in our state amongst our youth and our treasured wildlife. Certainly our wildlife deserves better than this pain and suffering.

**6/5/2018**

**Wendy Luedke**

**Lead SD**

**wendymluedke@gmail.com**

**Comment:**

I am righting to declare that I agree that name tags should be placed on all traps. Trappers, like any other business, have to be held accountable for their actions. I read where one trapper admitted that 76% of the animals he caught in traps were not his intended game. How is this OK? Why are we allowing trappers' rights but not the animals or the environment/ecological system? Tradition? Are we actually calling severe cruelty to animals tradition? We have a history of traditions that were done away with or changed when found cruel and unnecessary. The percentage of trappers in the US has diminished greatly. There are no longer the valid reasons of the past to trap. It is inhumane.

Trapping needs to be regulated and traps tagged with the owner's name. Trappers have to be held accountable for snaring and causing harm to unintended animals. Animals have rights and they depend on humans to be their voice.

**6/5/2018**

**Frank Dicesare**

**Rapid City SD  
fdic917@outlook.com**

**Comment:**

On behalf of the Rapid City Chapter of the Izaak Walton League of America we wish to express our support for these proposed rule changes.

We feel that mandatory identification tags on traps and snares is essential so that conservation officers can quickly identify and remove illegal traps. The majority of other states require trapper identification tags. We feel that ethical trappers would have no problem complying with these proposed rules.

We also support the ban on snares during the pheasant season, both east and west River. Such a ban would protect hunting dogs and help to reduce the capture of non-targeted animals. Additionally we support the proposed year round ban on snares, that use springs or other powering devices that hold the snare closed, on Game Production Areas and Waterfowl Production Areas above water

**6/5/2018**

**Rory Halverson**

**Custer SD**

**ibowhunt298@yahoo.com**

**Comment:**

. I strongly oppose the proposals in regards to trapping and snaring. By not allowing snaring until after pheasant season is closed is absolutely ridiculous. It would take away nearly 2 months from a trapper when most fur, especially coyotes is at it's prime. Every fur buyer I've ever talked to has told me the time to harvest coyotes is in November and December. This is fact! After that the quality starts to degrade from rubbing and etc. It would not be right to cater one special interest group and take away from others to use public land. Also there are not pheasants in all parts of the state. It makes no sense at all especially to those us us who snare in the Black Hills.

The proposal that would require all traps and snares to be marked with the owners name and address is also ridiculous. It would create an unwarranted expense to the trapper and serve no purpose other than letting a trap thief know who they are stealing from. I personally don't want some anti crazy person knowing my name and address, especially for the sake of safety for me and my family. Also what happens if I do have someone stealing my equipment with my identification on it and the they go make illegal sets and do stupid things, I would most likely be targeted because it had my name on it. Also a trap tag would not keep a pheasant hunters dog out of a snare or trap.

The proposal that would not allow the use of springs on snares is also ridiculous. The purpose of a snare is capture an animal and dispatch it. The use of a spring helps to do this more efficiently and humanly. I thought the idea to dispatch or release a trapped animal as soon as possible was the goal. The idea that a snare kills instantly is just not true. Have you ever heard of a chew out? Why let that coyote be alive longer than needed. A domestic dog usually won't fight a snare they will just sit down and wait. A good pheasant hunter/dog owner will be aware if their dog doesn't come out of the brush and will go see what's going on. There will be plenty of time to release it from a snare.

Again, I strongly disagree with all 3 proposals to trapping and snaring. All 3 of them will cause a financial burden to a trapper. It's not just the price of trap tags, it also will include lost fur in the shed from chew outs and having to modify existing equipment with springs or purchase new snares without them that don't work as well. It would also hurt many trappers income possibly by several thousands of dollars by not being able to harvest big numbers of coyotes that they normally do by the use of snares for nearly 2 months when the fur is prime and worth the most. I also feel that if you start talking things away now, what's next? The anti trapping people are out there and never give up. Trappers are truly sportsmen and conservationists that play a huge part in wildlife conservation and population control. Please don't take away from us, and cater to big money pheasant hunters. It's our public land too!



**6/5/2018**

**Darci Adams**

**Hartford SD**

**dadams@humanesociety.org**

**Comment:**

I'm unable to attend your June 7-8 meeting in Aberdeen, please accept the attached written comment on the rule finalization of trapping prohibitions.

I'm a South Dakota native, an advocate for animal protection, and for the past 8 years I have served as The Humane Society of the United States South Dakota State Director. We urge your support of the proposal amending the trapping prohibitions in Chapter 41:08:02 for reasons outlined in the attached letter.

**6/5/2018**

**Evan Anderson**

**Wasta SD**

**eandersonwasta@gmail.com**

**Comment:**

I'm a South Dakota landowner and a livestock producer. Please do not change any of the snaring/ trapping regulations! Less coyotes means more calves and more wildlife.  
Thanks

**6/5/2018**

**Bill Kurtenbach**

**Groton SD**

**Comment:**

Members of the Game, Fish, and Parks Commission:

Please consider the following thoughts I have regarding the issue to change the regulations for the use of snares on WPA's and GPA's in South Dakota. I've been hunting on GPA's, WPA's and private land in South Dakota with a bird dog for over 30 years. In my hunting vest I have always carried two things just in case I would need them. The first is a bottle of water for my dog, and the second is a cable cutter. Both are very inexpensive and could save a dog's life. I've used the water many times, and have never had to use the cable cutter. I understand that two dogs were caught in snares last year and neither was fatal. I'm not trying to minimize that traumatic event but, that is a very small percentage when you consider how many dogs were on WPA's and GPA's last year. Also one must consider the much higher number of sporting dogs that are killed or injured each year while hunting, caused by accidental shooting, being hit by vehicles, or die from dehydration due to the dog owner's neglect. These public lands were purchased with money generated by licenses purchased by sportsmen, including hunters, anglers, and trappers. I feel they all have the same rights when it comes to recreating on that public land. Banning snaring until after pheasant season is as effective as a total ban, because a very small percentage of snaring on GPA's/WPA's occurs after that date. I think we need to be very careful not to make changes based on emotion rather than facts. There are many special interest groups lying in wait to add fuel to that fire to take more and more rights from future sportsmen and sportswomen. In closing I would like to state that I am opposed to any changes in the current trapping and snaring regulations in South Dakota. Information could be included in the Hunting and Trapping Handbook to inform bird hunters of snare use and dog safety.

## 10. Hunting Requirement – Mandatory CWD Testing

**5/7/2018**

**Daniel John Amen**

**Rapid City SD**  
**dakotainc@gmail.com**

**Comment:**

I do support this testing and would also like to see it implemented in the State of SD.

**5/23/2018**

**Heather Nearman**

**SD  
nearheat@gmail.com**

**Comment:**

I urge the SDGFP commission to support the proposal because South Dakota is one of only a few states that fail to require traps to bear information identifying the trap owner/user. This lack of identification makes it nearly impossible for law enforcement agencies to identify those who may be using traps illegally and it will protect unintended victims of trapping.

Nancy Hilding  
President  
Prairie Hills Audubon Society  
P.O. Box 788  
Black Hawk, SD 57718  
June 3rd, 2018

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

Dear Commission,

**Comments on proposed rule on unlimited hunting party size.**

Prairie Hills Audubon Society (PHAS) is opposed to the proposal to remove limits on the size of hunting parties, as written. We believe this will be unsafe and result in shootings of people. We believe that the 20-person limit was enacted decades ago due to shootings of people associated with group hunting of rabbits, which was done in large and constricting circles.

We offer an alternate suggestion, although this letter is not a petition for rulemaking.

We suggest you start a program like the general permits the EPA/DENR uses to streamline permitting of various pollution release actions. A general permit reduces the bureaucratic hassle for both sides: general permits are simple to get. Individual permits are more of a hassle. The EPA/DENR writes the conditions of a general permit and if the permittee can agree to meet those terms, they send in a notice letter to the agency 48 hours before they start the activity. They don't need to wait to hear back from EPA/DENR. If they can't agree to those terms, they need to apply for an individual permit.

We suggest that SD GFP continue this issue to the next commission meeting and have staff write a "general permit" that lists the qualifications needed for a safe hunt involving many people. Such conditions might be: give a name of responsible party who is organizing the hunt, limits on the type of prey, limits on seasons of hunt, limits on type of guns and ammunition allowed, limits on direction of shooting (such as into the air), limits on formation of the hunters (will they be in a line or on opposing sides?), limits on height of the vegetation relative to height of hunters (how obstructed is the view?), directions on the amount of and placement of orange worn by hunters, restrictions on hunting in deep snow and requiring parental permission for anyone under 18.

We also express concern for potential impacts to "at risk" wildlife and the possibility that large hunts could impact habitat security for any "at risk" species. We believe that turkey season is in the spring, perhaps April and a goose season is also in the spring, perhaps March. We believe that predator/varmint seasons are year round. We thus see the possibility of a large hunt targeting

varmints (such as rabbits or prairie dogs) or predators (such as coyotes), occurring during breeding season, especially of sage grouse, or ground nesting raptors and other birds. We thus suggest that staff communicate with the Wildlife Diversity Program to see if such hunts, could inadvertently impact any state or federal listed species or wildlife species of "greatest conservation need". We ask specifically about the northern long eared bat, the greater sage grouse, interior least tern, piping plover, ferruginous hawk, burrowing owl, and the whooping crane. If there are such concerns, then restrictions that limit access to areas of their critical habitat could be added to the general permit. We also suggest that group hunting during deep snow, might stress out wildlife that SDGFP prizes as a hunting resource. Thus if the Wildlife Diversity Program agrees, perhaps a general permit needs some conditions relative to non-target wildlife.

The GFP could offer an "individual" permit for any hunting group that can't meet the terms of the general permit. It could delegate the approval of "individual permits" to particular staff member(s) and provide general guidelines listing the issues to be addressed - such as hunter formations, view shed, limits on ammunition and guns and unintended yet adverse impacts to "at risk" wildlife.

If you don't use the "general permit" idea, we still suggest you continue the matter & incorporate some of the above limits into your new rule.

Sincerely,

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

Nancy Hilding  
President  
Prairie Hills Audubon Society

Nancy Hilding  
President  
Prairie Hills Audubon Society  
P.O. Box 788  
Black Hawk, SD 57718  
June 3rd, 2018

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

Dear Commission,

### **Comments on proposed changes to trapping/snaring rules.**

In this letter we indicate support for the proposed changes offered by the Commission, but if you scroll down to page 3, we offer more related and suggested changes.

#### **TRAPPER ID**

We thank the Commission for proposing a rule to **require owner IDs on traps/snares** placed on public land and improved road right-of-ways. This means if there is illegal trapping/snaring going on, GFP will know who owns the traps/snares. PHAS has been asking for this for a long time. 43 other states already require trap IDs.

Many trappers oppose the change; some alleging enemies will mess with their traps and frame them. Today there are trail cameras, small video cameras or cell phones that date stamp photos...modern technology provides these businesses, with defenses against trappers being framed. Also, if tampering occurred, the trappers can argue that, before GFP staff and/or the court as a defense. Please remember trapping is mostly a commercial enterprise. Trappers may sell furs for profit or act to kill animals that bother ranchers/farmers & thus increase ranch/farm profit (both are business actions). They need to be held to commercial standards for behavior.

Why should trapping happen, without regulators knowing who owns and set the traps

on our public lands -- how can GFP staff enforce the law? We thank GFP for proposing the change.

## **TIME OF YEAR PROHIBITIONS**

The Commission is proposing **extending the time for prohibition on snares on East and West River public land and public improved road right-of-ways by a few months** in the late fall/winter. Currently it is prohibited May to November. This change is to prevent accidental snaring of hunting dogs during pheasant season. We support this change.

However we wonder why the Commission and staff are just concerned about dogs owned by hunters, while engaged in hunting. Don't you have an equal obligation to all pet owners & an equal fiduciary duty to watch over all domestic animals that could be harmed by activities that you permit, such as snaring?

## **POWERED SNARE DEVICES**

Also proposed is a ban **forbidding certain types of snares that forcibly hold snares closed on Game Production and Waterfowl Production Areas**; the rule change would forbid "using springs or other powering devices that hold the snare closed". We also support this proposed change. We don't know why it is just proposed for GPA and WPA and not all public land and public right-of-ways.

## **OTHER CHANGES ARE NEEDED - ARGUMENT.**

We are appreciative of any positive change to make SD's trapping/snaring rule or law more "humane". SD's snaring restrictions inadequately reduce harm to snared animals. Other states may out-law snares entirely or more heavily regulate snaring. Use of snares under SD current rule permits in our opinion, cruelty to animals, that many other states don't allow. Animals can be slowly strangled or choked, hung, or other body parts such as abdomen can be encircled

In SD's East River animals can be left in snares/traps for 2 and a partial day. West River they can be left in traps/snare for 3 and a partial day. Animals are likely without water or food, perhaps exposed to extreme weather, perhaps injured by trap/snare device, in stress and/or pain or harassed by predators for many days. If they have dependent young, they may be separated from those. They may die in the trap/snare. Non-target

animals, including endangered species & pets, may not survive if released. Many states require a 24-hour trap check time but not SD. If SD GFP reduced the trap check time, pets in snares, would live longer with less damage.

Born Free USA gives SD an "F" on our trapping regulations. Look at the card and compare our state with others for many values.

Link to Born Free's Scorecard:

[http://7a1eb59c2270eb1d8b3da9354ca433cea7ae96304b2a57fdc8a0.r60.cf1.rackcdn.com/BFUSA\\_Trapping\\_Extended\\_Report\\_Card.pdf](http://7a1eb59c2270eb1d8b3da9354ca433cea7ae96304b2a57fdc8a0.r60.cf1.rackcdn.com/BFUSA_Trapping_Extended_Report_Card.pdf)

[http://www.bornfreeusa.org/a10\\_trapping\\_reportcard.php](http://www.bornfreeusa.org/a10_trapping_reportcard.php)

## **OTHER CHANGES SUGGESTED**

We suggest that the Commission continue this matter and investigate & consider the below options. This is not a petition for rulemaking. When we submit a petition for rulemaking, we will label it as such.

1. That the restriction on use of spring powered choking snares be for all public land and right-of-ways, not just GPA and WMA. We also request that the trappers be required to use the release - "relaxing lock snares" on all public land and public right-of-ways. This is a lock that allows the snare loop to loosen slightly when an animal stops pulling against it. (see Michigan Fox and Coyote Non-lethal Snaring Guide, which is attached).
2. That they use a smaller pounds of pressure for breakaway force - 285 instead of 350 pounds, (see Michigan Fox and Coyote Non-lethal Snaring Guide, which is attached)  
We ask that the break occur at the loop, not at the ground tie, so the animal does not drag the severed cable around with them, continuing the constriction and possibly getting hung up on other objects.
3. That GFP consider a larger diameter snare loop stop, at least for some target species. SD has a 2.5-inch diameter restriction on the snare loop stop, but Michigan for hunting coyotes/fox has a 4.5-inch diameter (see Michigan Fox and Coyote Non-lethal Snaring Guide, which is attached)



4. 24-hour trap/snare check time on public land or public-right-of ways, with an up to 24- hour time extension option available, for special emergencies, if the extension permission is granted in advance or as acceptance after the fact, by SDGFP staff.

5. For traps/snares that have a potential to damage or kill domestic animals, we request that you place a "no trap/snare buffer" from edge of houses, public buildings and any identified public hiking trails, picnic areas or camp grounds, unless land/building owner gives permission. We suggest a furlong (660 feet), because GFP uses that distance for other setback limits, although we are not sure what the limit should be.

6. Trappers must report to SDGFP all domestic animals caught in traps/snares and photograph the trapped/snared domestic animals and GPS their location, which they share with SD GFP and local animal welfare organization (if such exists). The trappers have a duty to provide water/food to such animals, if the animal permits it. If the animal is judged to be severely injured/sick and unlikely to limp home, they have a duty to ask a nearby local landowner about ownership and to take the severely injured domestic animal, to either the domestic animal's owner's dwelling, a vet, an animal welfare organization or other responsible care giver. Such intervention can provide a variance on the required trap check time interval if needed.

We attach

1. The Born Free Extended Score Card,
2. The Michigan Fox and Coyote Non-lethal Snaring Guide
3. Relaxing Snare Requirement for Bobcat Sets - 2013
4. Modern Snares for Capturing Mammals - Association of Fish and Wildlife Agencies

Here are links to some References:

SD Trapping regulations

<http://sdlegislature.gov/Rules/DisplayRule.aspx?Rule=41:08:02>

SD's Furbearer Seasons

<http://sdlegislature.gov/Rules/DisplayRule.aspx?Rule=41:08:01>

Modern Snares for Capturing Mammals - Association of Fish and Wildlife Agencies

[https://www.fishwildlife.org/application/files/5515/2002/6134/Modern\\_Snares\\_final.pdf](https://www.fishwildlife.org/application/files/5515/2002/6134/Modern_Snares_final.pdf)

Sincerely,

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