

**Minutes of the Game, Fish, and Parks Commission**  
**September 5-6, 2019**

Chairman Gary Jensen called the meeting to order at 1:03 p.m. MT at Holiday Inn Convention Center in Spearfish, South Dakota. Commissioners Gary Jensen, Travis Bies, Mary Anne Boyd, Jon Locken, Scott Phillips, Russell Olson, Douglas Sharp, Robert Whitmyre and approximately 50 public, staff, and media were present.

**DIVISION OF ADMINISTRATION**

**Conflict of Interest Disclosure**

Chair Jensen called for conflicts of interest to be disclosed. None were presented.

**Approval of Minutes**

Jensen called for any additions or corrections to the July 8-9, 2019 meeting minutes, July 24, 2019 special meeting minutes, and August 12, 2019 special meeting minutes or a motion for approval.

Motion by Sharp with second by Locken TO APPROVE THE MINUTES OF THE JULY 8-9, 2019 REGULAR MEETING, JULY 24, 2019 SPECIAL MEETING, AND AUGUST 12, 2019 SPECIAL MEETING. Motion carried unanimously.

**Additional Commissioner Salary Days**

Commissioner Phillips requested two additional salary days one for parks meetings and the other for a trapping meeting, Commissioner Bies requested one day for ADC meeting, Commissioner Whitmyre requested one for trapping meeting and Commissioner Jensen requested 6, one for a Second Century Habitat Fund Board meeting and the other five for WAFWA.

Motioned by Olson, second by Boyd TO APPROVE THE COMMISSIONER SALARY DAYS AS REQUESTED. Motion carried unanimously.

**Commission 2020 Meeting Schedule**

Chris Petersen, administration division director, presented the 2020 Commission meeting calendar noting the criteria used to determine locations by considering factors such as adequate facility space and accommodation services, wireless connections, and relationship of location to agenda items.

Motion by Phillips with second by Bies TO APPROVE THE 2020 COMMISSION MEETING SCHEDULE. Motion carried unanimously.

**License List Request**

Petersen presented a license list requests to the Commission from South Dakota Landowner Alliance, Pierre, SD for a full fee license list request for All pheasant preserves, owners and operators to be used for marketing and membership.

Motioned by Whitmyre, second by Locken TO APPROVE THE LICENSE LIST

REQUEST. Motion carried unanimously.

### **Hunt for Habitat**

Deputy Secretary Kevin Robling provided a quick summary of funds raised by the Hunt for Habitat raffle. In all, \$320,950 was generated during the 45 day raffle. Residents contributed \$201,110 and habitat funds generated from nonresidents were \$119,840. Robling reminded Commissioners that the individuals who won have been notified and they will have the opportunity to choose which hunting year they will use the tags; either 2019 or 2020. Wildlife Division Deputy Director Tom Kirschenmann briefly described the content of Resolution 19-21 which outlined the intended uses of the funds generated by the Hunt for Habitat raffle. The focus would be to conduct habitat efforts statewide on Game Production Areas and SD School and Public Lands.

Motion by Olson, second by Locken TO ADOPT RESOLUTION 19-21 (appendix A) TO UTILIZE HUNT FOR HABITAT FUNDS TO SUPPORT HABITAT. Roll call vote: Boyd-yes; Locken – yes; Bies - no; Olson- yes; Whitmyre - yes; Phillips – yes; Sharp- yes; Jensen-yes. Motion passes with 7 yes votes and 1 no vote. Motion passes

### **Recruitment Retention and Reactivation (R3)**

Robling and Taniya Bethke, division staff specialist, presented information on recruitment, retention and reactivation.

Motion by Boyd, second by Olson TO ADOPT RESOLUTION 19-22 (appendix B) TO CONSIDER THE R3 IMPACT PRIOR TO AMENDMENT OR ADOPTION OF REGULATIONS IMPACTING PARTICIPATION IN HUNTING, ANGLING, TRAPPING AND OUTDOOR RECREATING. Motion carried unanimously.

### **Zebra Mussel Response Plan**

Mike Greiner, aquatic invasive species (AIS) coordinator, and Jona Ohm, Strategic Communications Director, provided an update on the Department's response to the discovery of zebra mussels in Lake Sharpe and the high probability of presence in Lake Francis Case. Greiner provided a timeline of the field response by aquatics and law enforcement staff from the initial discovery until present time and Ohm provided the actions taken by the communications team. Law enforcement staff conducted 17 special details with 818 boats checked, 104 citations written, and 8 warnings issued. Watercraft inspectors checked 994 boats and trailers since the initial discovery (2042 total in 2019). Zebra mussels have been found as far upstream as West Bend in Lake Sharpe but have not yet been documented in Lake Francis Case, pending results from ongoing monthly monitoring efforts. An outline of future efforts for the next 1-2 months (public meetings, presentations, monitoring efforts) and for the next 12-18 months (authorities needed, funding sources, identifying priority waters, incorporating research, citizen science monitoring and outreach opportunities, other Agency contributions, long term communications plan) were provided. Greiner presented results from economic impact study, where statewide infestation of all surface waters at the maximum biological potential of zebra mussels could cost the state \$33.5M- \$81.4M annually. A finer scale study will be conducted at infested waters in SD and KS over the next year to ground truth those estimates.

### **Missouri River Refuges**

Regional Supervisor Mark Ohm provided a short update on the refuge review workgroup. Progress has been slow, but about 30 individuals and groups have been contacted to participate in this workgroup. This group's main focus will be to provide a list of data for the Commission to consider, or a lens to look through, when considering changes to the waterfowl refuge system.

## **PETITIONS**

### **Muzzleloader Antelope**

Seth Vant Hof, Black Hawk, SD submitted a petition to add a specific muzzleloader antelope hunting season.

Motion by Phillips, second by Boyd TO DENY THE RECOMMENDED CHANGE TO ALLOW FOR A SPECIFIC MUZZLELOADER ANTELOPE HUNTING SEASON. Motion carried unanimously.

Motion by Olson, second by Phillips TO ADOPT RESOLUTION 19-24 (appendix D) DENYING THE PETITION.

### **Dog Training on Public Lands**

Bobby Mills, Boston, GA submitted a petition to change the 3 allowed days from Friday, Saturday, Sunday to Monday, Wednesday, Friday to not have 3 consecutive days of pressure from dog trainers and sport enthusiast.

Motion by Bies, second by Whitmyre TO APPROVE THE RECOMMENDED CHANGE TO CHANGE THE ALLOWED DAYS FOR DOG TRAINING ON PUBLIC LANDS. Motion carried unanimously.

### **Trapper ID**

Nancy Hilding, Black Hawk, SD presented her petition to create a trapping ID that will be placed on all set traps.

Motioned by Bies, second by Boyd TO DENY THE PETITION TO CREATE A TRAPPING ID FOR ALL SET TRAPS. Motion carried unanimously

Motioned by Phillips, second by Locken TO ADOPT RESOLUTION 19-25 (appendix E) DENYING THE PETITION. Motion carried unanimously

## **PUBLIC HEARING**

The Public Hearing began at 2:02 p.m. and concluded at 2:03 p.m. The minutes follow these Commission meeting minutes.

## **OPEN FORUM**

Jensen opened the floor for discussion from those in attendance on matters of importance to them that may not be on the agenda.

John Hopple, Black Hawk, SD - SD Trappers Assoc. presented information to the commission in regards to trapping regulations specifically trapper ID's and trap check times.

Ben Page, Mud Butte, SD voiced his concern about shortening the trap check time explaining it takes over an hour each day to run trap lines. Said he has traps with his ID on them in multiple states. Support departments position to maintain the time at 72 hours.

Vince Logue, Oelrichs, SD - Western SD Furharvesters support 72 hours and clarifications. He does not support trap tags. No one has more of a vested interest in the well-being of animals in the state. For trappers it is to enjoy what we do we need a healthy population of wildlife. No other organizations are better at it.

Finn Sacrison Bison, SD - Western SD Furharvesters thanked to commission for the new proposal. Works hard to promote ethical trapping to the youth. Enjoy being out there and want it to go on for generations. Do not support the 24 hour trap check. The only way there can be a future is through education of youth and it's good to do this as a group.

Tuffy Halls, Hot Springs, SD – Western SD Furharvesters said he was impressed with the positive attitude of the commission and GFP. The R3 initiative is a refreshing outlook for GFP. Trapping is thought of as the old version with the big teeth on them but several years ago the best management practices helped evolve the traps used and the humane trapping of the animal was taken into consideration. These are not pets they are wild animals. Thanked GFP for work on youth education programs

Joe Logue, Oelrichs, SD – private trapper. They did a 24 hour trap check in the 50's and it simply did not work and was removed. I am opposed to any trap marking. Believe the 24 hour check came about after the tail bounty that is a horrible program. Doesn't like to see young animals killed because I can't catch them when they are larger and have the furs.

Justin Krajewski, Spearfish, SD – trapper licensed trapper. Commended commission and Governor Noem on bounty program. Successful to get kids outdoors trapping as part of the R3 efforts. Supports the department recommendation on the rule change.

Jamie Al-Haj, Rapid City, SD other states have 24 hour trap check times and SD is lagging behind as we often do. GFP needs to establish humane and ethical treatment of animals. Inconceivable that we would allow an animal to suffer for 3 days because it is an inconvenience to trappers. Talked about wanting more people to be involved and participate in the outdoors this allows the opportunity. Also in support of trapper id as how can there be oversite and enforcement when they do not need to identify themselves. Respect trappers and feel they have good intentions, but there are other things that need to be considered as this is doable and 36 other states are currently doing this.

Nancy Hilding, Black Hawk, SD – Prairie Hills Audubon Society, worries about the 360 day harvest with hounds. There is suitable habitat on the prairie and GFP has finally acknowledged this. There are 4 dead kittens found in the streams. This plan is completely and utterly inadequate. Completely object to the next predator bounty program and hope it is not done again but if it is you need to be transparent and meet

the administrative rule deadlines. Oppose the trap check time rules and provided a handout on trap robbing that allows GFP to intervene. Stand by the 24 hour trap check time.

Roger Twamley, Oacoma, SD Muzzleloader optics should be changed. Love the sport and hope other with the same concerns have notified you as we all want to ethically and humanely harvest an animal. It is difficult as you get older and would like the change in optics to allow for this.

Max Matthews, Bison, SD – Perkins County Predator Control Board has never been a trapper and does plan to likes to leave it to the professionals who know what they are doing. This is an important management tool. Fear the trapper would not be successful if the time taken to check traps was set at 24 hours would not allow for other aspects of the job. Sheep and lambs have no defense against predators. Often times predator kill them for fun or they are severely wounded and eventually die or need to be euthanized. Would like the commission to consider this and not the livestock industry depends on the trappers to do their job.

Eric Loken, Camp Crook, SD – Sheep Mountain Taxidermy Do not agree with the first two points on the CWD proposal because business come from neighboring states this would cause to go out of business. Doesn't understand why the butchers are not here to voice concerns. Doesn't understand what exactly is being proposed.

Clark Blake, Camp Crook, SD CWD has the potential to have a negative impact on taxidermist and businesses like his who depend on hunters. Supports the 72 trap check proposal and state trappers are necessary. Do not support trapper id. Need to leave the prairie mountain lion season as is.

Mike Watkins, Alzada, MT outfitter in Montana and Wy, the CWD proposal would be detrimental. Under this proposal I could not use the taxidermist. This doesn't address or provide enforcement for the people who go out of state to hunt because they cannot bring their deer back. Appreciate the commission giving people the opportunity to address the commission.

Don Hausle, Spearfish, SD – Rancher last good hay crop was in 2015. Cannot afford to purchase the hay we need because of the elk recommends the units be smaller so the elk could be targeted. \$700-\$800 is a fraction of what the forage is worth. Will send a letter within 60 days that will cite court cases. Needs a resolution on this depredation.

Wes Reinford, Nisland, SD butcher concerns with CWD and understands the impact. All waste goes to a crematorium on the property. Spoke with sportsmen against hunger said they cannot bring things from other counties and other states.

## **FINALIZATIONS**

### **Velvet Antler Tagging**

Chad Switzer, wildlife program administrator, presented the recommendation to repeal the rule requiring velvet antlers be tagged as the statue was repealed by legislation during the 2019 session.

Motion by Locken, second by Sharp TO REPEAL THE TAGGING OF VELVET ANTLERS. Motion carried unanimously.

### **Wildlife Feeding Dates**

Switzer presented the recommendation to modify wildlife feeding dates to begin August 1<sup>st</sup> in stead of August 15<sup>th</sup> because of the September 1<sup>st</sup> start date for archery deer hunting.

Motion by Sharp, second by Phillips TO APPROVE THE CHANGE IN WILDLIFE FEEDING DATES. Motion carried unanimously.

### **Rules Review Process Chapter 41:01 through 41:03 – Style and Form**

Jon Kotilnek, senior staff attorney presented the recommended changes to administrative rules pertaining to GFP as part of the review process. The Department recommends the following rule changes for the following administrative rules in an effort to reduce redundancy, increase transparency and improve consistency:

#### **Chapter 41:01**

1. 41:01:01:02 – Appointment of hearing officer – amend rule to insert gender neutral language and update authority.
2. 41:01:01:03 – Create new rule within article 41:01 to address applicability of GFP rules for Department employees in the performance of their official duties.
3. 41:01:02:01 – Definitions – create additional definitions of “state park system” and “water access areas.”

Kotilnek also presented the recommended change from proposal to not create the new rule 41:01:01:03 as SDCL 41-2-16 adequately addresses the concerns and a new rule is not necessary.

Motion by Boyd, second by Bies TO AMEND THE FINALIZATION AS RECOMMENDED. Motion carried unanimously.

Motion by Sharp, second by Boyd TO APPROVE THE RECOMMENDED CHANGES AS AMENDED TO RULES IN CHAPTER 41:01. Motion carried unanimously.

#### **Chapter 41:02**

1. 41:02 – License Agents – amend article title to “Licensing Agents” for consistency with rules found within this article.
2. 41:02:01:04 – Restriction on sale of licenses – amend rule to address nomenclature for consistency.
3. 41:02:01:05 – Postdating prohibited-Exception – amend rule to address nomenclature for consistency.
4. 41:02:01:07.01 – Disconnecting licensing agents with past due accounts – amend rule to differentiate between agent suspensions and revocations.

5. 41:02:01:12 – Emergency authorization books – amend rule to make form and style changes.

Motion by Olson, second by Whitmyre TO APPROVE THE RECOMMENDED CHANGES AS PROPOSED TO RULES IN CHAPTER 41:02. Motion carried unanimously.

#### Chapter 41:03

1. 41:03:01:01 – Unauthorized land use and entry on posted land prohibited – amend rule to eliminate unnecessary language.
2. 41:03:01:01.01 - Time restrictions for use of George S. Mickelson Trail – amend rule in an effort to consolidate rules and address time restrictions for use of all Department lands.
3. 41:03:01:01.02 – Time restrictions for use of state park system – repeal rule/consolidation.
4. 41:03:01:01.03 – Time restrictions for use of public hunting areas and lake access areas – repeal rule/consolidation.
5. 41:03:01:01.04 – Prohibited use of walk-in areas – amend rule to eliminate unnecessary language.
6. 41:03:01:02 – Leaving of property on department land – amend rule to address nomenclature for consistency.
7. 41:03:01:04 – Permit required for certain organized events – amend rule to address nomenclature for consistency.
8. 41:03:01:07 – Commercial use prohibited – amend rule to eliminate unnecessary language.
9. 41:03:01:10 – Buildings, erection of signs, advertising, and fences prohibited – amend rule to eliminate unnecessary language and address nomenclature for consistency.
10. 41:03:01:11 – Loud speakers prohibited – amend rule to eliminate unnecessary language and address nomenclature for consistency.
11. 41:03:01:13 – Pet prohibitions – amend rule to address nomenclature for consistency and make form and style changes.
12. 41:03:01:14 – Horses and riding prohibited-Exception – amend rule to address nomenclature.
13. 41:03:01:15 – Camping in state park, state recreation area, and state lakeside use area allowed only in designated campgrounds – Fourteen-night limit – amend rule to address nomenclature.
14. 41:03:01:16 – Restrictions on use of firearms, crossbow, and bows-Exceptions – amend rule to address nomenclature and eliminate unnecessary language.

15. 41:03:01:16.02 – Restrictions on use or possession of firearms on lake and fishing access and game production areas-Exceptions – amend rule to address nomenclature.
16. 41:03:01:16.03 – Discharge of firearms and bows on George S. Mickelson Trail prohibited – repeal unnecessary rule.
17. 41:03:01:17 – Slingshots prohibited – amend rule to address nomenclature and eliminate unnecessary language.
18. 41:03:01:19 – Limitation on tree stands, elevated platforms, and portable blinds – amend rule to provide additional clarity.
19. 41:03:01:20 – Hiking off trails at Bear Butte without permission prohibited-Exception – amend rule to provide additional clarity.
20. 41:03:01:21 – Hang gliding prohibited – amend rule to add appropriate authority.
21. 41:03:01:23 – Residential trash prohibited at department trash facilities – amend rule to provide additional clarity.
22. 41:03:01:24 – Glass containers prohibited – amend rule to provide additional clarity and eliminate unnecessary language.
23. 41:03:01:25 – Jumping and diving at Palisades State Park, Custer State Park, Big Sioux Recreation Area, and Angostura Reservoir prohibited – amend rule to provide additional clarity.
24. 41:03:01:26 – Use of certain rock climbing aids prohibited-Exceptions – amend rule to address nomenclature.
25. 41:03:01:27 – Forage restrictions – Custer State Park and Mickelson Trail – amend rule to add authority.
26. 41:03:01:29 – Restrictions on use of metal detectors-Written authorization required – amend rule to address nomenclature.
27. 41:03:01:31 – Alcoholic beverage prohibited at Lake Alvin swim beach – amend rule in an effort to consolidate similar rules and add provision for Bolton Game Production Area in Union County.
28. 41:03:01:32 – Alcoholic beverage prohibited at Bear Butte State Park – repeal rule/consolidation.
29. 41:03:01:33 – Leaving of human remains at Bear Butte State Park prohibited – repeal rule as it is covered by other state statutes and administrative rules by Department of Health.
30. 41:03:01:34 – Hunter Quarry Lake and Fishing Access Area-Entry or use prohibited-Exceptions – repeal rule and move to more appropriate section under ARSD 41:04:02.
31. 41:03:01:35 – Bait stations prohibited – amend rule to provide additional clarity.
32. 41:03:01:36 – Limitation on trail cameras – amend rule to provide additional clarity.

33.41:03:01:37 – Firewood prohibited – amend rule to address nomenclature.

Kotilnek also presented the recommended change from proposal to also create the new rules 41:03:01:36 and 41:03:01:37 to clarify rules in regards to trail cameras and firewood prohibitions.

Motion by Sharp, second by Phillips TO AMEND THE FINALIZATION AS RECOMMENDED. Motion carried unanimously.

Motion by Locken, second by Sharp TO APPROVE THE RECOMMENDED CHANGES AS AMENDED TO RULES IN CHAPTER 41:03:01. Motion carried unanimously.

#### Chapter 41:03:02

1. 41:03:02:01 – Driving off roads prohibited-Exceptions – amend rule to provide clarity and eliminate unnecessary language and add specific authority.
2. 41:03:02:02 – Speed limit on department lands – amend rule to provide clarity and consolidate similar rules and add specific authority.
3. 41:03:02:05 – Exhibition driving prohibited – amend rule to provide clarity on applicable areas and add specific authority.
4. 41:03:02:07 – Obedience to yield signs required-Pedestrian has right of way – repeal rule/consolidation.
5. 41:03:02:09 – Obedience to stops signs required – repeal rule/consolidation.
6. 41:03:02:10 – Obedience to one-way road signs required – repeal rule/consolidation.
7. 41:03:02:11 – Parking in no parking zones prohibited – repeal rule/consolidation.
8. 41:03:02:12 – Parking in handicapped space restricted – repeal rule/consolidation.
9. 41:03:02:13 – Restrictions on motor vehicles-Exceptions – amend rule to provide additional clarity on applicable areas and add specific authority.

Motion by Boyd, second by Whitmyre TO APPROVE THE RECOMMENDED CHANGES AS PROPOSED TO RULES IN CHAPTER 41:03:02. Motion carried unanimously.

#### Chapter 41:03:03

1. 41:03:03:03 – Park entrance license required for admission to state parks and certain recreation areas and lakeside use areas – amend rule to provide additional clarity and add specific authority.
2. 41:03:03:03.01 – Park entrance license exemptions – amend rule to consolidate similar rules and address additional areas where park license exemption exists and add specific authority.
3. 41:03:03:03.02 – Spring open house park entrance license exemption – amend rule to provide additional clarity and add additional periods for free park entrance and add

specific authority.

4. 41:03:03:03.03 – Park entrance license not required – repeal rule/consolidation.
5. 41:03:03:04 – Time limits on daily license – amend General Authority/Law Implemented.
6. 41:03:03:05 – Limitations on half-price annual park entrance license – amend rule to provide additional clarity.
7. 41:03:03:06 – Park entrance license fees – amend rule to provide additional clarity.

Motion by Bies, second by Sharp TO APPROVE THE RECOMMENDED CHANGES AS PROPOSED TO RULES IN CHAPTER 41:03:03. Motion carried unanimously.

#### Chapter 41:03:04

1. 41:03:04:01 – Definitions – amend administrative misspelling.
2. 41:03:04:02 – Camping permit required-Exceptions – amend rule to provide clarity.
3. 41:03:04:04 – Registration procedures – amend rule to provide additional clarity.
4. 41:03:04:05.01 – Campsite reservations-Payment of camping fees-Cancellation fees – amend rule to provide additional clarity and add authority.
5. 41:03:04:05.02 – Reserved group picnic shelter fee – amend General Authority/Law Implemented.
6. 41:03:04:07.01 – Sale of firewood – amend rule to address nomenclature and add authority.
7. 41:03:04:10.02 – Camping cabin and rent-a-camper occupancy restricted – amend rule to eliminate reference to rent-a-camper and add authority.
8. 41:03:04:11 – Use of electrical service restricted – amend rule to address nomenclature and add authority.
9. 41:03:04:12 – Checkout times enforced – amend rule to provide additional clarity and address nomenclature and add authority.

Motion by Locken, second by Phillips TO APPROVE THE RECOMMENDED CHANGES AS PROPOSED TO RULES IN CHAPTER 41:03:04. Motion carried unanimously.

#### Chapter 41:03:05 and Chapter 41:03:06

1. 41:03:05:01 – Payment of trail user service fee required for certain recreational trails – amend rule to provide additional clarity and add authority.
2. 41:03:05:04 – Expiration of daily trail user pass – amend rule to extend time period that daily trail user pass is valid.
3. 41:03:05:06 – Display of trail user pass – amend rule to provide additional clarity.

4. 41:03:06:01 – Display of a commercial snowmobile trail user pass required – amend rule to eliminate unnecessary language.

It was recommended to make a change from proposal to removed 41:03:05:04

Motion by Sharp, second by Boyd TO AMEND THE FINALIZATION AS RECOMMENDED. Motion carried unanimously.

Motion by Whitmyre, second by Phillips TO APPROVE THE RECOMMENDED CHANGES AS AMENDED TO RULES IN CHAPTER 41:03:05 and 41:03:06. Motion carried unanimously.

## **PROPOSALS**

### **Chronic Wasting Disease Regulations**

Switzer presented the recommendation to establish new rules related to transportation and disposal of deer and elk carcasses from other states and hunting units within South Dakota's known endemic areas where Chronic Wasting Disease had been confirmed.

Motion by Sharp, second by Olson TO APPROVE THE RECOMMENDED CHANGES TO CHRONIC WASTING DISEASE REGULATIONS. Motion carried unanimously.

### **Trapping Regulations**

Keith Fisk, animal damage control program administrator, presented the proposal on trap check times that resulted from a petition that was approved by the Commission. Fisk explained changes to the current rule as follows:

1. Modify existing administrative rule to require that all traps and snares in South Dakota be checked within 24-hours from the time the trap or snare was set.
2. Create a new administrative rule that would allow Game, Fish and Parks personnel to grant extensions to the 24-hour check time due to unanticipated complications or emergencies.
3. Create a new administrative rule that before setting traps and snares, it shall be the duty of the person setting a trap or snare to study the weather reports for the next 48-hours and make a record of that data. It is expected that such person will not set traps and snares when a reasonable person would conclude that the weather-related complications would likely preclude checking traps and snares within 24-hours.
4. Create a new administrative rule which would allow Game, Fish and Parks personnel to release or euthanize an animal held in a trap or snare longer than 24-hours.
5. Create a new administrative rule which would allow any person, after receiving permission from a Game, Fish and Parks personnel, to release or euthanize an animal in a trap or snare longer than 24-hours.
6. Create a new administrative rule that requires any animals euthanized by an authorized person of Game, Fish and Parks, which a profit is generated, to be reverted back to Game, Fish and Parks.
7. Create a new administrative rule in which Game, Fish and Parks shall keep records on trap check time extensions and shall give an annual summary report to the Game, Fish and Parks

No action is necessary to move forward to finalization.

Fisk presented the proposed rule change to modify existing administrative rule to require all traps and snares in South Dakota be checked prior to 12 o'clock midnight of the third full calendar day following a previous check or when the trap was initially set, and for any trap or snare entirely submerged in water that remains set beneath the ice to be checked prior to 12 o'clock midnight of the fifth full calendar day statewide, following a previous check or when the trap was initially set.

Motion by Olson, second by Bies TO APPROVE THE RECOMMENDED CHANGES TO THE TRAP CHECK TIMES. Roll call vote: Boyd-yes; Locken – yes; Bies - yes; Olson- yes; Whitmyre - yes; Phillips – yes; Sharp- no; Jensen-yes. Motion passes with 7 yes votes and 1 no vote. Motion passes.

### **Muzzleloader Scopes**

Kirschenmann presented the recommended changes to the muzzleloading restrictions to make an allowance for 1-4x or 1-6x power scopes for seasons to muzzleloading firearms. He explained a petition was received by the Commission indicating that the non-telescopic sights are no longer available and have been discontinued by manufacturers.

No action is necessary to move forward to finalization.

### **Mountain Lion Hunting Season**

Kirschenmann and Switzer presented the recommended changes to the mountain lion hunting season.

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

Motioned by Phillips second by Olson TO APPROVE THE RECOMMENDED CHANGES TO THE MOUNTAIN LION HUNTING SEASON. Motion carried unanimously.

### **CSP Coyote Hunting Season**

Switzer presented the recommended changes change to the CSP Coyote Hunting Season dates from December 26 – March 31 to December 26 – April 30 and remove the requirement of a free access permit.

Motioned by Boyd second by Olson TO APPROVE THE RECOMMENDED CHANGES TO THE CSP COYOTE HUNTING SEASON. Motion carried unanimously.

## **Hoop Nets and Set Lines**

Will Sayler, fisheries program administrator, presented the recommended changes as follows:

1. Add a definition of setline in rule.
2. Add traps to hoop net and setline regulation title.
3. Allow the use of wire fish traps.
4. Change hoop net, trap and setline rules to require them to be emptied by midnight the day following when they were set instead of 72 hours. This will improve the chance of live release of the few game fish caught on setlines and turtles in all gears.
5. Change hoop net, trap and setline gear restrictions on border waters to match those for inland waters.
6. Allow use of hoop nets, traps, and setlines in the James, Vermillion, and Big Sioux River mainstems.
7. Allow use of hoop nets and traps in western Missouri River tributaries to increase angler opportunity.

Motioned by Sharp second by Boyd TO APPROVE THE RECOMMENDED CHANGES TO HOOP NETS AND SET LINES. Motion carried unanimously.

## **Public Waters – Aeration**

Sayler presented the recommendation to create a new rule in 41:04 Public Waters to identify the department as the designated agent of the Commission for permitting use of aeration systems in meandered waters or other waters to which the state has acquired a right, title, or interest.

Motioned by Sharp, second by Phillips TO APPROVE THE CREATION OF THE NEW RULE. Roll call vote: Boyd-yes; Locken – yes; Bies - no; Olson- yes; Whitmyre - no; Phillips – yes; Sharp- yes; Jensen-yes. Motion passes with 6 yes votes and 2 no vote. Motion passes

## **Fish Importation**

Sayler presented the recommended changes to fish importation as follows:

1. Allow for a single importation permit from an out-of-state source to cover an entire year from their last fish health inspection to reduce paper work and staff time.
2. Specify in rule which fish species need to be tested for which pathogens of regulatory concern. This will reduce the costs for private industry and GFP to have fish health testing conducted.

Motion by Olson, second by Sharp TO APPROVE THE RECOMMENDED CHANGES TO FISH IMPORTATION RULES. Motion carried unanimously.

## **Aquatic Invasive Species**

Sayler presented the recommended changes to fish importation as follows:

1. Add spiny waterflea (*Bythotrephes longimanus*), round goby (*Neogobius melanostomus*), and white perch (*Morone americana*), to the aquatic invasive species (AIS) list in South Dakota.
2. Add Lakes Sharpe and Francis Case to the list of designated containment waters for AIS management in South Dakota.

Motion by Bies, second by Sharp TO APPROVE THE RECOMMENDED CHANGES TO FISH IMPORTATION RULES. Motion carried unanimously.

#### **Rules Review Process Chapter 41:04 throught 41:05 – Style and Form**

Kotilnek presented the recommended changes to administrative rules pertaining to GFP as part of the review process. The Department recommends the following rule changes for the following administrative rules in an effort to reduce redundancy, increase transparency and improve consistency:

##### **Chapter 41:04:01**

41:04:01:01	Applicability of chapter - Repeal
41:04:01:02	Special purpose buoy specifications - Update authority.
41:04:01:03	Restricted area buoy markings - Update authority.
41:04:01:04	Reduced speed area buoy markings - Update authority.
41:04:01:05	Information buoy markings. Update authority.
41:04:01:06	Safety zones defined – Adjust language and update authority
41:04:01:07	Buoy placement requirements - Adjust language and update authority.
41:04:01:08	Diver-down flag requirements - Update authority.
41:04:01:10	Presence of persons in water near boat ramps prohibited-Update authority.

Motion by Boyd, second by Sharp TO APPROVE THE RECOMMENDED CHANGES AS RECOMMENDED TO RULES IN CHAPTER 41:04:01. Motion carried unanimously.

##### **Chapter 41:04:02**

41:04:02:02	Beadle County public water safety zones – Update language
41:04:02:04	Bon Homme County public water safety zones – Update language
41:04:02:06	Brown County public water safety zones. Update language and authority
41:04:02:07	Brule County public water safety zones – Update language
41:04:02:09	Butte County public water safety zones – Update language
41:04:02:11	Charles Mix County public water safety zones – Update language
41:04:02:12	Clark County public water safety zones – Update language
41:04:02:14	Codington County public water safety zones – Update language
41:04:02:15	Corson County public water safety zones – Update language
41:04:02:16	Custer County public water safety zones – Update language
41:04:02:18	Day County public water safety zones. Update language and authority
41:04:02:19	Deuel County public water safety zones – Update language
41:04:02:20	Dewey County public water safety zones – Update language
41:04:02:22	Edmunds County public water safety zones – Update language

41:04:02:23	Fall River County public water safety zones – Update language
41:04:02:25	Repealed. Add Grant County public water safety zones (New Rule)
41:04:02:26	Gregory County public water safety zones – Update language
41:04:02:29	Hand County public water safety zones – Update language
41:04:02:30	Hanson County public water safety zones – Update language
41:04:02:32	Hughes County public water safety zones – Update language
41:04:02:33	Hutchinson County public water safety zones – Update language
41:04:02:38	Kingsbury County public water safety zones – Update language
41:04:02:39	Lake County public water safety zones – Update language
41:04:02:41	Lincoln County public water safety zones – Update language
41:04:02:42	Lyman County public water safety zones – Update language
41:04:02:43	McCook County public water safety zones – Update language
41:04:02:44	McPherson County public water safety zones – Update language
41:04:02:45	Marshall County public water safety zones – Update language
41:04:02:46	Meade County public water safety zones – Update language
41:04:02:49	Minnehaha County public water safety zones – Update language
41:04:02:51	Pennington County public water safety zones – Update language
41:04:02:52	Perkins County public water safety zones – Update language
41:04:02:53	Potter County public water safety zones – Update language
41:04:02:54	Roberts County public water safety zones – Update language
41:04:02:58	Stanley County public water safety zones – Update language
41:04:02:62	Turner County public water safety zones. – Update language
41:04:02:63.01	Union County public water safety zones – Update language
41:04:02:64	Walworth County public water safety zones – Update language
41:04:02:66	Yankton County public water safety zones – Update language

Motion by Phillips, second by Bies TO APPROVE THE RECOMMENDED CHANGES AS RECOMMENDED TO RULES IN CHAPTER 41:04:02. Motion carried unanimously.

#### Chapter 41:04:03

41:04:03:01	Meandered water areas defined – Update language and update authority
41:04:03:02	Restriction of access prohibited – Update authority
41:04:03:03	Posting of signs prohibited – Language and update authority
41:04:03:04	Farming prohibited – Exception – Update language and authority
41:04:03:05	Modification prohibited – Exception – Update language and update authority

Motion by Sharp, second by Boyd TO APPROVE THE RECOMMENDED CHANGES AS RECOMMENDED TO RULES IN CHAPTER 41:04:03. Motion carried unanimously.

#### Chapter 41:04:04

41:04:04:01	Definition of terms - Update language
41:04:04:05	Requirements for dock and floating dock maintenance – Update language

Motion by Boyd, second by Bies TO APPROVE THE RECOMMENDED CHANGES AS RECOMMENDED TO RULES IN CHAPTER 41:04:04. Motion carried unanimously.

Chapter 41:04:05

41:04:05:01.01	Boat license fees – Update language
41:04:05:02	Life preservers required – Update language
41:04:05:03	Fire extinguishers required – Exception – Update language and authority
41:04:05:04	Flame arresters required – Update authority
41:04:05:04.01	Whistle required – Update authority
41:04:05:04.02	Bell required – Update authority
41:04:05:05	Ventilation required – Update authority
41:04:05:06	Navigation rules – Update language and authority
41:04:05:08	Restriction on right-of-way – Update authority
41:04:05:09	Blockage of docks forbidden – Update authority
41:04:05:15	Audible signals – Update language and authority
41:04:05:16	Emergency signals -- Boats to stop – Update authority
41:04:05:18	Lights required - Exception – Update language and authority
41:04:05:19	Overloading prohibited – Update authority

Motion by Whitmyre, second by Olson TO APPROVE THE RECOMMENDED CHANGES AS RECOMMENDED TO RULES IN CHAPTER 41:04:05. Motion carried unanimously.

Chapter 41:04:06

41:04:06:02	Commission action on petition to restrict recreational use of nonmeandered lake. – Update language and reduce redundancy
41:04:06:03	Due process requirements for interested parties from the public - Repeal
41:04:06:04	Appeal from commission's final action on petition to restrict recreational use of nonmeandered lake – Repeal.
41:04:06:05.01	Placement of department supplied signs – Update language

Motion by Boyd, second by Olson TO APPROVE THE RECOMMENDED CHANGES AS RECOMMENDED TO RULES IN CHAPTER 41:04:06. Motion carried unanimously.

Chapter 41:05:01

41:05:01:01	Types of refuges defined – Update language and authority
41:05:01:02	Hunting within a waterfowl refuge – Update language
41:05:01:03	Hunting and trapping within a state game refuge – Update language and authority
41:05:01:04	Hunting within a state game bird refuge –Update language and authority
41:05:01:05	Hunting within a federal refuge, park, or monument – Exception - Repeal

Motion by Sharp, second by Bies TO APPROVE THE RECOMMENDED CHANGES AS RECOMMENDED TO RULES IN CHAPTER 41:05:01. Motion carried unanimously.

**Chapter 41:05:02**

41:05:02:06	Brown County refuges – Update language
41:05:02:07	Brule County refuges – Update language and authority
41:05:02:08	Buffalo County refuges - Repeal
41:05:02:11	Charles Mix County refuges - Repeal
41:05:02:12	Clark County refuges – Update language
41:05:02:15	Corson County refuges - Repeal
41:05:02:18	Day County refuges – Update language
41:05:02:20	Dewey County refuges - Repeal
41:05:02:22	Edmunds County refuges – Update language and authority
41:05:02:24	Faulk County refuges – Update language and authority
41:05:02:25	Grant County refuges – Update language and authority
41:05:02:26	Gregory County refuges - Repeal
41:05:02:29	Hand County refuges – Update language
41:05:02:32	Hughes County refuges – Update language and authority
41:05:02:33	Hutchinson County refuges – Update language and authority
41:05:02:42	Lyman County refuges - Repeal
41:05:02:45	Marshall County refuges – Update language and authority
41:05:02:52	Perkins County refuges – Update language and authority
41:05:02:53	Potter County refuges - Repeal
41:05:02:54	Roberts County refuges – Update language and authority
41:05:02:57	Spink County refuges – Update language
41:05:02:58	Stanley County refuges – Update language
41:05:02:59	Sully County refuges - Repeal
41:05:02:64	Walworth County refuges - Repeal
41:05:02:66	Yankton County refuges – Update language and authority
41:05:02:68	Missouri River refuges – Update language

Motion by Sharp, second by Bies TO APPROVE THE RECOMMENDED CHANGES AS RECOMMENDED TO RULES IN CHAPTER 41:05:02. Motion carried unanimously.

**Park Entrance and Camping Fees**

Robling and Al Nedved, parks assistant director, presented the recommended changes to park entrance and camping fees as follows:

1. Increase certain Park entrance fees and camping fees:

Park Entrance	License Current Fee	Proposed Increase	New Fee
Annual	\$30	\$6	\$36
Second Vehicle	\$15	\$3	\$18
Transferable	\$65	\$15	\$80
Daily	\$6	\$2	\$8
CSP Motorcycle 7-Day	\$10	\$10	\$20
Camping Fees			
Prime*	\$21	\$5	\$26

Preferred Campgrounds*	\$19	\$4	\$23
Modern Campgrounds*	\$17	\$3	\$20
Basic Equestrian CG except CSP	\$13	\$5	\$18
Semi-modern Equestrian CG except CSP*	\$19	\$7	\$26
CSP Modern Campgrounds*	\$25	\$5	\$30
CSP Equestrian Campground*	\$35	\$5	\$40
CSP Camping Cabins	\$50	\$5	\$55
Camping Cabins except CSP	\$45	\$10	\$55
Firewood	\$5	\$1	\$6

\*Fee includes \$4 for sites where electricity is available

2. Remove group lodge designation for Mina Lake (\$205) and designate as a modern cabin (\$150)
3. Increase the fee from \$10 to \$15 for each day a vehicle is in a park and does not display a valid park entrance license. This amount may be applied to the purchase of an annual park entrance license.
4. Create a new state-wide fee for Designated Tent-Only Campsites with no electricity at \$15.

Motioned by Sharp, second by Bies TO APPROVE THE RECOMMENDED CHANGES TO PARK ENTRANCE AND CAMPING FEES. Motion carried unanimously.

## DIVISION OF PARKS AND RECREATION

### Gorton Property Transfer

Nedved presented information on the transfer of property from the Parks and Wildlife Foundation at Palisades State Park offering wildlife habitat, preservation and public recreation.

Motioned by Olson with second by Boyd TO ADOPT RESOLUTION 19-23 (Appendix C) as presented. Motion carried unanimously.

### Revenue, Camping and Visitation Reports

Nedved provided the reported that year-to-date visitation, camping and revenue by district through August 2019.

## DIVISION OF WILDLIFE

### Elk Contingency Licenses

Kirschenmann presented information regarding elk contingency licenses for the 2019 hunting season.

### Big Game Water Development Projects

John Kanta, wildlife regional supervisor, explained to the Commission that water is not generally not a limiting factor for wildlife in the Black Hills. As such water projects are not a top priority for habitat projects in the Black Hills. Examples of higher priorities

would protecting and enhancing riparian areas, removing pine regeneration from meadow areas and hardwood releases. When it comes to water habitat projects they are typically projects to protect springs, seeps and ponds. When determining if a water development project is necessary SDGFP first looks at whether water is a limiting factor for wildlife in the area keeping in mind that wildlife can go to water and are able to jump fences. SDGFP also considers issues that wildlife may cause when visiting private property to get to water when justifying a water development project. A handout was distributed and discussed with the commission detailing a few of the water development projects that SDGFP has participated in.

#### **License Sales Update**

Tony Leif, wildlife division director presented the year to date license sales update.

#### **SOLICITATION OF AGENDA ITEMS FROM COMMISSIONERS**

Sharp requested information regarding waterfowl and Bies requested information on Commission meeting utilization of electronic devices and documents.

#### **Adjourn**

Motion by Olson, second by Phillips TO ADJOURN AT 11:30 A.M. Motion carried unanimously.

Respectfully Submitted,

A handwritten signature in black ink that reads "Kelly R. Hepler". The signature is fluid and cursive, with "Kelly" on the top line and "R. Hepler" on the bottom line.

Kelly R. Hepler, Department Secretary

## **Appendix A**

### Resolution 19-21

Whereas, The Department of South Dakota Game, Fish & Parks (Department) relies on hunters to help fund the management and use of the State's natural resources and associated habitats.

Whereas, there has been a steady decline in hunting participation both at a national and state level.

Whereas, the resulting decline in participation has a direct negative impact on financial resources available to manage natural resources and associated habitats.

Whereas, the Commission and Department have recognized the necessity to implement new habitat funding mechanisms.

Whereas, the Commission and Department implemented the Hunt for Habitat raffle in 2019 as a new approach to generate additional financial resources to support habitat initiatives.

Now, Therefore, Be it Resolved, funds generated by the Hunt for Habitat raffle will be used to support habitat development and enhancements on public lands, in particular Game Production Areas and School and Public Lands.

Be it further resolved, the Commission and Department will utilize the Hunt for Habitat revenue to support the following identified needs and new habitat efforts.

- A. Improve and establish habitat on Game Production Areas across the state identified through a statewide assessment. Implementation of one-time identified projects will occur over the next 4-5 years.
  - a. Acquisition of necessary equipment such as planters, transportation, prescribed fire, and weed control implements.
  - b. Hire or contract to complete habitat management activities.
  - c. Establishment of new grassland plantings – 22,500 acres.
  - d. New perennial pollinator and food plots – 1,700 acres.
  - e. Enhancing existing grassland habitat – 40,000 acres.
  - f. New woody cover and tree plantings – 1,000 acres.
  - g. Grazing infrastructure – cross fencing and water sources.
- B. Improve and establish habitat on the 700,000+ acres of School and Public Lands across the state.
  - a. Riparian management
  - b. Grazing infrastructure – cross fencing and water sources.
  - c. Enhancing existing grassland habitat
  - d. New woody cover and tree plantings

**Appendix B**  
**Resolution 19-22**

Whereas, The Department of South Dakota Game, Fish & Parks (Department) relies on a wide variety of outdoor enthusiasts and users to fund the management and use of outdoor recreational resources.

Whereas, nationally, there has been a steady decline in hunting, trapping and angling participation since the 1980's.

Whereas, the resulting decline in participation has a direct correlation to the sustainability of our strong outdoor heritage in South Dakota.

Whereas, the resulting decline in participation has a direct negative impact on financial resources available to manage outdoor recreational resources.

Whereas, the Commission understands and recognizes the necessity to recruit, retain and reactivate participants in hunting, angling, trapping and outdoor recreating.

Whereas, the Department shall continue to prioritize their focus on recruitment, retention, and reactivation of resource users and all outdoor enthusiasts.

Now, Therefore, Be it Resolved, prior to amendment or adoption of regulations, the Commission shall consider the impact the regulation would have on recruitment, retention and reactivation of hunting, angling, trapping and outdoor recreating participants.

Be it further resolved, the Commission shall consider, at a minimum, the following criteria when determining whether to adopt or amend a regulation:

- (1) whether the regulation/fee inhibits a user's ability to participate,
- (2) does the regulation increase the opportunity for new and existing users,
- (3) how does the regulation impact the next generation of hunters, anglers, trappers and outdoor recreationists,
- (4) does the regulation enhance the quality of life for current and future generations by getting families outdoors.

**Appendix C**  
**RESOLUTION 19- 23**

WHEREAS, South Dakota Parks and Wildlife Foundation owns real estate (Property) described as:

LOT 4 IN BOWAR'S FIRST ADDITION IN THE NORTHWEST QUARTER OF THE NORTHEAST QUARTER (NW1/4 NE1/4) AND THE NORTHEAST QUARTER OF THE NORTHWEST QUARTER (NE1/4 NW1/4) OF SECTION 31, TOWNSHIP 103 NORTH, RANGE 47 WEST OF THE 5TH P.M., MINNEHAHA COUNTY, SOUTH DAKOTA, ACCORDING TO THE RECORDED PLAT THEREOF.

WHEREAS, South Dakota Parks and Wildlife Foundation, Inc. desires to gift the Property to the South Dakota Department of Game, Fish and Parks (Department); and

WHEREAS, the Department has evaluated and determined that the Property would serve very well as an addition to Palisades State Park, offering wildlife habitat, preservation, and public recreational opportunities; and

WHEREAS, the Department is authorized to accept gifts of property for park and recreational purposes per SDCL §§ 41-2-19 and 41-2-24; and

WHEREAS, the South Dakota Game, Fish & Parks Commission desires to authorize the Department to accept this gift of property from the South Dakota Parks and Wildlife Foundation to be used as an addition to Palisades State Park, and further acknowledge the generosity and dedication of South Dakota Parks and Wildlife Foundation towards expansion of Palisades State Park.

NOW, THEREFORE, BE IT RESOLVED, that the South Dakota Game, Fish and Parks Commission does hereby authorize the Department to accept the gift of the Property from South Dakota Parks and Wildlife Foundation to be used as an addition to Palisades State Park.

BE IT FURTHER RESOLVED that the South Dakota Game, Fish & Parks Commission, on behalf of the citizens of South Dakota, does hereby acknowledge and express its deepest appreciation and gratitude to South Dakota Parks and Wildlife Foundation for its generosity, and further acknowledge the outdoor recreational opportunities this gift will provide to South Dakotans for many years to come.

**Appendix D**  
**RESOLUTION 19-24**

WHEREAS, Seth Vant Hof of Dell Rapids, South Dakota, submitted a Petition to the Game, Fish and Parks Commission (Commission) dated August 14, 2019, requesting that the Game, Fish and Parks Commission amend ARSD § 41:06:23:01 (Antelope hunting season established -- Number and type of licenses) – to add a specific muzzleloader antelope hunting season for the reasons more fully set out in the petition (hereinafter referred to as “the Petition”); and

WHEREAS, all members of the Commission have been furnished with and have reviewed a copy of the Petition; and

WHEREAS, the Commission has been advised that a copy of the Petition has been served on all members of the Interim Rules Review Committee and Director of the Legislative Research Council as required by SDCL § 1-26-13; and

WHEREAS, the Commission has been advised that SDCL § 1-26-13 requires that within thirty (30) days of submission of a Petition, the Commission shall either “deny the petition in writing (stating its reasons for the denials) or shall initiate rule-making proceedings in accordance with SDCL 1-26-4.”; and

WHEREAS, the Commission has been advised and is of the opinion that a hearing on the Petition is neither statutorily required nor necessary; and

WHEREAS, the Commission has reviewed and carefully considered the requirements and procedures set out in SDCL §1-26-13 and the contents of the Petition, including the reasons advanced by Petitioner in support of adding a specific muzzleloader antelope hunting season; and

WHEREAS, a hunter can currently use a muzzleloader to hunt during the firearm antelope hunting season and with the advancement of muzzleloaders they are as effective as rifles in many ways; and

WHEREAS, because the archery antelope hunting season closes during the firearm seasons, adding an additional week for a muzzleloader season would take away opportunity to those archery hunting; and

WHEREAS, the Department will be considering an apprentice/youth antelope season and will likely discuss with the Commission in the future; and

WHEREAS, the Commission does not support nor believe the need exists to establish an antelope muzzleloader season.

NOW, THEREFORE, BE IT RESOLVED, that the Commission does hereby deny the Petition for the reasons hereinabove stated in this Resolution, which said Resolution as adopted by the Commission shall constitute the Commission’s written denial of the Petition and its reasons therefore.

BE IT FURTHER RESOLVED that the Petition, a record of the Commission's discussions concerning same, and this Resolution be made a part of the Minutes of the Commission meeting at which this Resolution is adopted, and further, that the Department be and it is hereby authorized and directed in compliance with SDCL §1-26-13 to serve a copy of an extract of that portion of the Commission minutes which pertain to the Commission's discussion of the Petition and its adoption of this Resolution, including a copy of the Resolution, on all members of the Interim Rules Review Committee and Director of the Legislative Research Council with copies also to be provided to the Petitioner, Seth Vant Hof of Dell Rapids, South Dakota.

**Appendix E**  
**RESOLUTION 19-25**

WHEREAS, Nancy Hilding of Black Hawk, South Dakota, submitted a Petition to the Game, Fish and Parks Commission (Commission) dated August 30, 2018, requesting that the Game, Fish and Parks Commission amend ARSD § 41:08:02 (Trapping Prohibitions) – Create a trapping ID that will be placed on all set traps for the reasons more fully set out in the petition (hereinafter referred to as “the Petition”); and

WHEREAS, all members of the Commission have been furnished with and have reviewed a copy of the Petition; and

WHEREAS, the Commission has been advised that a copy of the Petition has been served on all members of the Interim Rules Review Committee and Director of the Legislative Research Council as required by SDCL § 1-26-13; and

WHEREAS, the Commission has been advised that SDCL § 1-26-13 requires that within thirty (30) days of submission of a Petition, the Commission shall either “deny the petition in writing (stating its reasons for the denials) or shall initiate rule-making proceedings in accordance with SDCL 1-26-4.”; and

WHEREAS, the Commission has been advised and is of the opinion that a hearing on the Petition is neither statutorily required nor necessary; and

WHEREAS, the Commission has reviewed and carefully considered the requirements and procedures set out in SDCL §1-26-13 and the contents of the Petition, including the reasons advanced by Petitioner in support of requiring trapper identification to be placed on all traps; and

WHEREAS, there has been discussions by the Department around consistency of rules and the placement of private property on public lands (examples: tree stands, cameras) but have determined there are different circumstances for these regulations, in particular those revolving around illegal baiting and required time checks for trapping compared to other equipment placed on Game Production Areas; and

WHEREAS, the Commission formed a work group to study the trap tag requirement and brought forward a separate trap identification proposal that was not supported by the Commission; and

WHEREAS, the Department's law enforcement officers have successfully enforced trapping rules and regulations without a trap identification requirement since trapping rules were implemented; and

WHEREAS, a trap identification requirement is an unnecessary regulatory burden placed on trappers and creates further complexity to existing trapping rules, which contradict the Department's ongoing efforts to recruit, retain and reactivate people into the activity of trapping; and

NOW, THEREFORE, BE IT RESOLVED, that the Commission does hereby deny the Petition for the reasons hereinabove stated in this Resolution, which said Resolution

as adopted by the Commission shall constitute the Commission's written denial of the Petition and its reasons therefore.

BE IT FURTHER RESOLVED that the Petition, a record of the Commission's discussions concerning same, and this Resolution be made a part of the Minutes of the Commission meeting at which this Resolution is adopted, and further, that the Department be and it is hereby authorized and directed in compliance with SDCL §1-26-13 to serve a copy of an extract of that portion of the Commission minutes which pertain to the Commission's discussion of the Petition and its adoption of this Resolution, including a copy of the Resolution, on all members of the Interim Rules Review Committee and Director of the Legislative Research Council with copies also to be provided to the Petitioner, Nancy Hilding of Black Hawk, South Dakota.

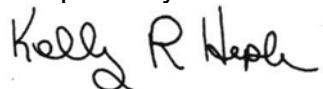
Public Hearing Minutes of the Game, Fish and Parks Commission  
September 5, 2019

The Commission Vice chair Scott Phillips began the public hearing at 2:02 p.m. MT at Holiday Inn Convention Center, Spearfish, South Dakota. Commissioners Gary Jensen, Travis Bies, Mary Anne Boyd, Jon Locken, Scott Phillips, Russell Olson, Douglas Sharp, Robert Whitmyre were present. Phillips indicated written comments were provided to the Commissioners prior to this time and will be reflected in the Public Hearing Minutes. Phillips then invited the public to come forward with oral testimony.

No verbal comments were received.

See attached written public comments submitted prior to the public hearing  
The public Hearing concluded at 2:03 p.m.

Respectfully Submitted,



Kelly R. Hepler, Department Secretary

# Public Comments

## Archery Deer Baiting Timeframe

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**Tom Braun**

**Hot Springs SD**

**Position:** oppose

**Comment:**

GF&P has stated that baiting and feeding deer aids the spread of CWD. Therefore, BAN BAITING! How you can come up w/all the restrictions regarding CWD (which are good and understandable) yet allow baiting, and EXPAND IT BY OPENING THE "BAITING SEASON" 2 WEEKS EARLIER IS IDIOTIC! Also, many of us believe baiting to be unethical, and does more to damage the image of hunters in the eyes of the public.

## Chronic Wasting Disease

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**Mark Peterson**

**Aberdeen SD**

**Position:** oppose

**Comment:**

This proposal is extreme overkill and puts far too much on the hunter when there is almost zero evidence that hunter movement of carcasses has any relevance to movement/transmission of CWD. I would propose keeping the disposal requirements but not keeping the specific requirements on breaking down and removing the spinal column etc on animals in the CWD control area.

This is a vast over-reach when you look at the numbers on animals tested and positive tests.

Transmission and spreading are far more linked to overpopulation and hyperconcentration of animals.

---

**Mark Olsen**

**Rapid City SD**

**Position:** oppose

**Comment:**

The CWD rule on meat transport seems like a rule just to make a rule. I am by no means any kind of expert on how CWD is passed from one animal to the next. But the chances of CWD passing from the remains of one animal a hunter is transporting to a live animal seems so far remote that there are better chances getting struck by lightning. I mean is this a problem where a live animal is coming into contact with an animal that has been hunt harvested then on top of that the harvested animal would have to have CWD?

---

**Jacob Pries**

**Bogart GA**

**Position:** support

**Comment:**

On behalf of the Quality Deer Management Association (QDMA), we would like to state our strong support for the regulations promulgated by the South Dakota Game, Fish and Parks Commission on Chronic Wasting Disease (CWD) and respectfully request these vital regulations be enacted. The QDMA is a national nonprofit wildlife conservation organization dedicated to ensuring the future of white-tailed deer, wildlife habitat and our hunting heritage. Founded in 1988, the QDMA has over 60,000 members nationwide and our membership includes hunters, landowners and natural resource professionals.

CWD is nothing short of an epidemic within the wildlife community and these common-sense regulations address the expanding problem of CWD in the United States keeping South Dakota's successful hunting industry thriving. CWD is an always fatal disease found in all native North American cervids including elk, moose, mule and white-tailed deer, and it has now been identified in 26 U.S. states, three Canadian provinces, Korea, Finland and Norway. Contagions spread through urine, feces, saliva, blood, deer parts, and especially via live animals. Importantly, there is no vaccine, no cure and no practical live animal test. Research shows plants uptake prions from infected soil, and hamsters that ate the plants contracted the disease. In addition, recent research provides evidence of some infection in humanized mice. These results do not cast a favorable light for CWD, deer, and American agriculture.

Whitetails are the most popular big game animal in the U.S., and whitetail hunters are the foundation of the nearly \$67 billion hunting industry. According to the National Shooting Sports Foundation, approximately three of every four hunters pursue whitetails. Additionally, 430,000 sportsmen and women in South Dakota contribute over \$1.04 billion annually and support 14,780 jobs. These regulations allow for the preservation of the white-tailed deer hunting culture that runs deep in the hearts of so many South Dakotans, while ensuring the necessary precautions are taken into consideration to preserve the economic contributions of hunters within your state. These necessary regulations are the next crucial step in South Dakota to address the problem of CWD being tackled across the country. On behalf of the Quality Deer Management Association, we would like to thank you for your time, dedicated service to the state of South Dakota, and your consideration of this matter. Please feel free to reach out with any questions.

Respectfully,

**Jacob Pries**  
Policy Intern  
Quality Deer Management Association

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**David Hiler**

**Arlington SD**

**Position:** other

**Comment:**

If it were many that had CWD they should be culled out and disposed in the right way let experienced hunters go in as a working group and be organized to lessen the chance to spread.

---

**Scott Brekke**

**Sioux Falls SD**

**Position:** support

**Comment:**

Now I understand the restricted area is not near me or my hunting land ...so some may say easy for you to support it all....but what I am is a hunter who wants to be able to hunt with his grandson someday...everything I read makes sense. ..bout time really..do what we got to do ...my2cents

---

**Bailey Gullikson**

**Pierre SD**

**Position:** support

**Comment:**

I am in support of these restrictions, however, I would add that there should be restrictions on feeding wildlife. Lessening the probability of nose to nose contact would help decrease the risk of spreading the disease.

---

**James Barnett**

**Sioux Falls SD**

**Position:** support

**Comment:**

Why not do it this fall?

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**James Barnett**

**Sioux Falls SD**

**Position:** support

**Comment:**

Why not do it this fall?

---

**Brian Aker**

**Sioux Falls SD**

**Position:** other

**Comment:**

The GFP has to be willing to get their buts out to the truck seats and take care of the road kill deer as well. Rotten carcasses on every hiway will certainly spread the disease.

---

**Robert Rohrer**

**Chancellor SD**

**Position:** oppose

**Comment:**

So I can't transport my trophy to get it mounted at my taxidermist of choice not in favor of this.

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**Oonagh Wood**

**Pringle SD**

**Position:** other

**Comment:**

Does SDGF&P require mandatory testing for CWD from elk/deer taken from areas known to have CWD? If not, why not?

---

**Kevin Rosse**

**Onida SD**

**Position:** support

**Comment:**

This will obviously be a inconvenience for us hunters but is a necessary step in the right direction! I would suggest setting up drop stations for us to properly dispose of spinal column and heads.

---

**Gary Decker**

**Centerville SD**

**Position:** other

**Comment:**

maybe u should sell more tags for these areas. been applying for ever with no success. Better to at least hunt them instead of letting die of cwd. I dont think your proposals will work. I would say it's very rare for a live deer to come into contact with carcass. seems like more unneccesary useless ,over regulation, with no real benefit for wildlife or hunter.

---

**John Ulumern**

**Rapid City SD**

**Position:** oppose

**Comment:**

Not allowing animals from other states is not good. If I bring an animal in from WY and dispose of an approved landfill, who cares? Seems there are several reasonable solutions out there without implementing unnecessary laws. Reject this thing!

---

**Brian Green**

**Piedmont SD**

**Position:** oppose

**Comment:**

Not being able to remove a whole carcass from the identified infected area will make it impossible for hunters that don't know how to process their own deer to hunt. How would it be possible to process game carcasses in the field in some of the weather conditions that our state experiences during the hunting seasons for deer? I fully support not wanting to spread CWD, but the proposed rules are going to make something that was once enjoyable, to now be a white knuckle experience with hunters so worried about making sure they follow the CWD rules, or fear citations from GFP. Your agency is essentially crippling the hunting population to exclude people with medical limitations that can't process their own game, and those with no experience on butchering an animal. These rules will directly increase the amount of game left to waste in the field for fear of not being allowed to meet GFP's new restrictions.

---

**Brian Heidbrink**

**Brandin SD**

**Position:** other

**Comment:**

I feel the CWD rules should be modified to allow hunters to somehow keep and transport a buck deer / bull elk head out of a CWD area. Many hunters don't want a full shoulder taxidermy mount and especially many elk hunters don't have the space to hang a full elk shoulder mount and so they instead prefer to do a European mount with the head boiled and bleached with the antlers attached. Also, the majority of hunters are not capable or experienced to cape out a head of a trophy buck/bull that would want to get mounted in order to cut the skull cap off. I would suggest a compromise to allow heads to be transported or allowed to be transported with the brains removed.

---

**Todd Craig**

**Rapid City SD**

**Position:** support

**Comment:**

Although this proposal will make it more difficult for some hunters, we are the leaders in wildlife conservation and we must step up and lead again.

---

**Jeremy Krause**

**Canton SD**

**Position:** other

**Comment:**

I don't see what the difference would make hauling a dead deer versus a live one that can spread the disease would?

---

**Guy Bennett**

**Rapid City SD**

**Position:** other

**Comment:**

I would like to see that you can transport a whole skull if the brain and spine is removed. There are tools out there to remove the brain from a skull so you could still do a european mount

---

**Dr Bob Woerman**

**Brandon SD**

**Position:** support

**Comment:**

SD GFP has a good start on control of transporting harvested game. But those who harvest are not professional butchers or DVM's. How does the hunter know all brain tissue is removed. Need an inspection.

Field dressing, all removed when field dressing needs to be collected & disposed where it will go to a landfill.

PREVENT. CWD SPREAD. This is a bit like pork & African Swine Fever. Not only are live pigs prevented from coming to US but also frozen unprocessed meat & processed meat.

---

**Eric Loken**

**Camp Crook SD**

**Position:** oppose

**Comment:**

As a licensed taxidermist in the State of SD, I have some concerns about the CWD proposal. My biggest concern is proposal 1. Interstate Carcass Transportation, section A & B. 70% of my taxidermy business is from out of state. Most hunters that bring game heads to my taxidermy shop are not able nor do they have the knowledge to cape out and cut and clean the skull plate properly so it can be transported to my shop and where it can be processed and mounted. By not allowing hunters to transport whole cervid carcasses to my shop you are jeopardizing the success of my business and livelihood. I propose adding to the proposal 1. ICT "allowing whole cervid carcasses to be transported to a taxidermist shop for processing and then the taxidermist as defined by 41:09:11:02 shall dispose of all remaining cervid carcass parts taken from another state etc. with a waste management provider or a permitted landfill.

Thanks and if you have any questions please feel free to contact me.

---

**Chris Mayer**

**Edgemont SD**

**Position:** other

**Comment:**

The enactment of this regulation will prevent me from bringing my whole deer carcasses to a Wyoming meat locker 24 miles away (nearest facility). I live within 3 miles of the SD/WY border, near the imaginary line that Elk & Deer cross daily without regards to their health. The processor is licensed by the state of Wyoming and some consideration must be made for SD residents transporting whole carcasses (elk or deer) to neighboring state processors. Then next available option for me is Rapid City area processors, a 2-hour trip. That is unrealistic.

---

**Larry Crawford**

**Sturgis SD**

**Position:** other

**Comment:**

What about the many roadkill deer, are they being disposed in a proper manner?

---

**Bud Shearer**

**Sioux Falls SD**

**Position:** oppose

**Comment:**

Not acceptable for anyone with the need to transport animals across the state. In fact ridiculous!!

---

**Clark Baker**

**Sioux Falls SD**

**Position:** oppose

**Comment:**

So basically if U do get lucky and draw a black hill deer tag, U can't transport it. Unless you cut it up...U folks can't ruin hunting much more....

---

**Mark Peterson**

**Aberdeen SD**

**Position:** oppose

**Comment:**

I oppose this proposed changed.

Other changes should be considered first before requiring hunters to completely debone animals prior like just requiring disposal in a landfill.

---

**Rod Heinrich**

**Hecla SD**

**Position:** other

**Comment:**

I understand the reasoning and the science behind the plan. But- I believe it is one more nail in the coffin. I know people have quit hunting because there's more rules than than they want to deal with, can't get permission to hunt, to many pheasant hunters on public land etc. And now they are going to come home from a hot spot or out of state and have to find a permitted company and pay them to dispose of the there deer parts.

---

**Delwyn Newman**

**Lemmon SD**

**Position:** support

**Comment:**

- 1) To keep big game from congregating in an area baiting should not be allowed and also feeding deer,elk should not be a practice for the general public, the public needs to know they could be aiding in the spread of CWD.
  - 2) Private farms for deer or elk should have a double fence around their perimeter to keep wild animals from coming into contact with the private herd.(Wisconsin has this rule for private herds)
  - 3) May be something could be done to allow a hunter to take the head and spinal cord to an approved site for disposal in an endemic area so as to further the cause of stopping or slowing down the spread of CWD.(rather than leaving in the field). Thank You
- 

**Douglas Dexter**

**Milbank SD**

**Position:** other

**Comment:**

I DO support the CWD Action Plan, however I support the "Second Draft" version from June 2019. Which appears to be the same as "Alternative #2" choices from the Final version dated July 2019. Maybe the 2 versions are saying the same thing, but the wording appears to be saying differently. As a licensed taxidermist, residing near the MN state border, I have seen first hand the effects of not allowing whole carcass transportation on the taxidermy business. It is detrimental to the taxidermist's income by not allowing carcass transportation, either interstate or intrastate. If we as taxidermists are going to assist in sample collection, we need the required parts of the carcass to do so. If you are going to make it difficult, or prohibitive, for the hunter to dispose of the carcass responsibly, they will continue to discard the carcasses anywhere in the rural areas of our state. Thank you.

---

**Paul Pierson**

**Belle Fourche SD**

**Position:** support

**Comment:**

No comment text provided.

---

**Gregory Palmer**

**Nemo SD**

**Position:** support

**Comment:**

No comment text provided.

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**Jeff Delay**

**Madison SD**

**Position:** oppose

**Comment:**

It sounds too restrictive and unmanageable.

We've always processed our own game and dispose of the waste to a certified landfill.

---

**Jeff Delay**

**Madison SD**

**Position:** oppose

**Comment:**

It sounds too restrictive and unmanageable.

We've always processed our own game and dispose of the waste to a certified landfill.

---

**Jason Taylor**

**Fort Pierre SD**

**Position:** oppose

**Comment:**

I am fine with the CWD proposal of having the deer/elk carcasses left in the field. The only issue that I have, is with the taxidermy portion of it. There are many hunters that enjoy doing their own European mounts, to them it is part of the hunt, experience, and enjoyment of the wildlife. A hunter applies for many, many years to draw an elk tag or an Any Deer tag in the Black Hills, now those hunters that do their own European Mounts will not be able to preserve their trophy themselves. Many hunters typically have a taxidermist that they have went to before, has seen the taxidermist work over and over and likes it, and also has a relationship built with them.

Now they will have to take their trophy to a taxidermist, that they have no experience/relationship with or no idea how good that taxidermist work is. For a hunter having to take a trophy to a taxidermist in the Black Hills area, typically wouldn't be that big of a deal if you lived in that area. But for those that live out in the Eastern part of South Dakota, they will have to travel all the way across the state to get their mount back. At least let the hunter bring the horns attached to the head and cape home with themselves so they can use a taxidermist of their choice and feel comfortable with. After years of waiting/applying for an elk tag and spending the money on a shoulder mount, the last thing I would want to do is put a shoulder mount of an elk in the back of a pickup and drive down the highway across the state, while the wind is wrecking the cape on my mount.

---

**Paul Lepisto**

**Pierre SD**

**Position:** support

**Comment:**

On behalf of the South Dakota Division of the Izaak Walton League of America I submit the following comments.

August 26, 2019

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

Dear Commissioners,

The South Dakota Division of the Izaak Walton League of America (Division) appreciates this opportunity to comment on the proposed carcass transportation and disposal regulations to help prevent the spread of Chronic Wasting Disease (CWD). The Division is comprised of about 1,500 members from across the state, many of whom enjoy big game hunting.

The proposed changes include the transportation and disposal of deer and elk carcasses from other states and from hunting units in South Dakota where CWD has been confirmed. If approved the proposed regulations wouldn't go into effect until the 2020 hunting seasons.

The Division supports the Commission enacting the proposed interstate and intrastate rule changes to help reduce the spread of CWD. The Division also supports the Commission enacting the carcass disposal rule changes for hunters, processors and taxidermists.

However we are disappointed the existing rulemaking process does not allow the proposed regulations to go into effect for this fall's big game seasons. We fear this delay could lead to the further spread of CWD in the state. We urge a change in the rule making process that, in a critical situation such as this, would allow quicker implementation of rules that protect our fish, wildlife and other natural resources.

In addition to the proposed new regulations the Division repeats our previously stated concerns about the more than 70 captive cervid facilities in South Dakota. We share other organizations and agencies' fears about possible transmission of CWD from captive animals to wild cervids.

The Division recommends the Game, Fish and Parks (GFP) and the Department of Agriculture propose and adopt regulations requiring all captive cervid facilities to install a double 8 foot tall woven wire fence with at least four feet separation between the fences. We believe this would greatly reduce the chance of a captive animal escaping and mixing with our wild cervid populations. The Division also urges the GFP and the Department of Agriculture to develop a new regulation that prohibits shipment of captive cervids into South Dakota from states or areas with confirmed CWD endemic areas.

Another issue we believe still needs to be addressed is the areas of the state where waste management does not accept carcasses or carcass parts. This is a serious issue for many hunters, taxidermists or processors who don't live close to a permitted landfill. The Division supports the state making waste containers available in these areas that facilitate safe disposal of carcasses and/or carcass parts to help reduce the spread of CWD from an infected carcass.

The Division also urges the GFP and the Commission to establish a study on whether there is any potential for CWD to be transmitted via the use of urine-based attractants. Several states have already banned the use of urine-based lures. Urine used in these lures is collected from commercial deer facilities with no regulatory oversight and urine can contain the prion that carries CWD. The risk of contaminating our wild cervid populations greatly outweighs any benefit from the use of these products. Currently there is no way to detect if urine-based attractants are free of CWD. We urge the Commission to establish a study on this issue and its possible impacts to the wild cervid population in the state as soon as possible.

The Division commends the Commission and the GFP for the high level of public involvement on CWD and its long-term impact to the cervid populations in South Dakota. We believe this is an important component and it must continue.

The South Dakota Division of the Izaak Walton League of America again thanks you for the opportunity to comment on the proposed regulations regarding the prevention of the spread of Chronic Wasting Disease. We ask that we be kept informed on all future developments, public meetings and other communications on this issue as it moves forward.

Sincerely,

Kelly Kistner  
National IWLA President and President of the South Dakota Division  
Izaak Walton League of America  
603 Lakeshore Drive  
McCook Lake, SD 57049

605-232-2030 (H) – 712-490-1726 (C)  
iwlasdpresident@outlook.com

## Other

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**Jordan Miller**

**Canton SD**

**Position:** support

**Comment:**

I am emailing to give my support in allowing higher magnification scopes on muzzle loaders.

I believe ethical shots will be easier to control with higher quality optics.

Thank you.

Jordan

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**Matthew Walters**

**Sf SD**

**Position:** other

**Comment:**

Please make it legal to use cut carp as bait for fishing makes no sense why you cant use a dead carp as bait  
please make this rule THANKS contact me with questions

---

**Jon Sorensen**

**Sioux Falls SD**

**Position:** oppose

**Comment:**

Trapping Check Time Reduction :

I am a trapper and i run a line in the fall that allows me to run part of it one day and the next part the second day with a 2 day check limit. If you would shorten the time i need to check on my traps and snares to 24 hrs then i would have to shorten my trap count by half and only be able to cover half of my line i had established over the years. Making me once again loose money on a already tough way of enjoying the outdoors in South Dakota. In the past when fur prices were large enough then yes the shorten time limit would not of affected nobody that much, but now since its already to a 48 window i have had to shorten my line once from a 3 day check in the past to a 2 day check and now shorten more. I would no longer feel it will be worth my time to even take part in the trapping season in South Dakota. Making me move onto other states for my enjoyment!

Thanks

Jon Sorensen

---

**Chris Tekrony**

**Castlewood SD**

**Position:** oppose

**Comment:**

I am opposed to shortening the Time to check traps to 24 hours. I have shared custody of my son and try to check traps every morning. Sometime I try to bring him which is after work 36 hours instead. Having to check traps at 4-5am before work is not an easy task either, if something goes wrong I dont get to check every trap until possibly after work. If I have vacation time I set in the morning and check after Im done, that way the animals arent piled up and are fresh for skinning after checking. Most nights I skin animals after work, or after checking the few I didnt check. I do run a short line of 12-30 traps and up to 40 snares when it snows. When snaring everything is entangled and dead asap. I have only had a raccoon dead once from the heat when I was a kid in our sweetcorn patch. I have video cameras on my traps to watch how the animals react. Most of the time they settle down after a few minutes, the trap startles them. Then the nap most of the time or get bored and dig around. If you use the correct equipment they dont chew on themselves, or feel any pain. I know many people take a month every year to trap full time for a living and they run 2-3 lines in the day periods to create more territory meaning more catches in traps. I hope they allow at least a 36 hour timeframe if not leave the 48 hours. Yes there are people that only check once a week and this will not make them change anyway.

---

**Skyler Scott**

**Presho SD**

**Position:** other

**Comment:**

I oppose shortening the trap check time from 3 days to 1 day.

---

**James Vollmer**

**Avon SD**

**Position:** oppose

**Comment:**

do not reduce trap checking time . with bad weather , sickness, accidents ECT. it is hard enough to run traps in 48 hours . I am 72 years old and do my best to check everyday sometime the weather and my health . dictate when an older or senior and check

---

**Richard Galbraith**

**Aberdeen SD**

**Position:** oppose

**Comment:**

Trap Check Time Reduction - please do not reduce the current trap times. It's only going to cost us trappers more money for fuel and other expenses. You want to increase/encourage trapping in SD this is not the way to go.

---

**Karin Woltjer**

**Beresford SD**

**Position:** other

**Comment:**

If you feel the need to trap, shortening the live trap time is a good thing.

---

**Keith Hickam**

**Timber Lake SD**

**Position:** oppose

**Comment:**

I feel that the current trap check times are adequate, changing to 24 hour check time would put hardship on trappers and be a burden on enforcement.

---

**Kyle Meier**

**Pierre SD**

**Position:** oppose

**Comment:**

Reducing trap check times to anything less than 48hours will end the trapping tradition significantly, especially for those who rely on it for income. A person can't justify spending 20 \$ in gas daily or more, nor has enough time to check them daily. Something will come up and having flexibility to plan your checks is essential. This law would only create violators.

---

**Gene Brockel**

**Mobridge SD**

**Position:** oppose

**Comment:**

I am a landowner not pleased with having to pay full price for deer license. Will be closing down land to outside hunting.

---

**Justin Murphy**

**Lyons SD**

**Position:** oppose

**Comment:**

The proposal to add magnified scopes for muzzleloaders is a move in the wrong direction. This tag was intended to be a primitive hunt. Adding magnified scopes removes the primitive challenge. The argument that 1x scope availability is hard to come by is not a valid argument. There are multiple options for both 1x scopes as well as red dot setups. I strongly oppose this change and hope that the commission takes a hard look at this proposal.

---

**Greg Pettersen**

**Madison SD**

**Position:** oppose

**Comment:**

I am responding to the trap check time issue

I am opposed to this change. I run a fairly large trapline this would severely limit that. And my ability to trap farms and help out landowners which do see a benefit from me trapping their properties. And I am disappointed that two groups of people that are obviously against any trapping can even get this to be an issue we trappers do bring revenue into many small towns and the gfp thru license revenue other states due have different trapping laws but there geographical logistics and populations are different from ours South Dakota is a unique state thank you for your time from a proud South Dakotan trapper

---

**Gerald Shaw**

**Rapid City SD**

**Position:** oppose

**Comment:**

I oppose any magnification optic to be allowed on muzzleloader weaponry for the South Dakota Muzzleloader Season. As a weapon that is meant to be a more primitive form of harvesting deer, allowing a magnified optic on modern day muzzleloaders would essentially make it another rifle season, allowing individuals the ability to reach out to upwards of 500 yards, and likely an increase in wounded animals and un-recovered game animals. Even a 1x optic I feel takes away from what the season was about. The argument that 1X optics are impossible to find is hogwash. A simple google search for "1X Muzzleloader Scope" yielded numerous results.

---

**Dustin Atkins**

**Box Elder SD**

**Position:** support

**Comment:**

I would like to provide a little insight on the point of allowing a scope on muzzleloaders for hunting. I resided in North Carolina for most of my life and have just recently moved to South Dakota about two years ago. I can't seem to understand why South Dakota cannot understand that adding a scope to a muzzleloader isn't going to change harvest reports or decrease herd reports drastically. We have hunted with Scopes on our muzzleloaders in North Carolina for as long as I can remember and our herd reports have stayed the same, if not INCREASED. It blows my mind that this commission is so much against change. Initialize it iterarily for a year, see how the harvest reports change, and if the results are drastic, remove the law from allowing scopes on muzzleloaders. Simple as that.

---

**Justin Allen**

**Pierre SD**

**Position:** oppose

**Comment:**

I'm opposed to allowing any scope other than 1x scope on muzzle loaders. If guys want to use muzzys with higher power scope do it during the regular rifle season. If this passes hunters will be shooting at deer further distances than they currently do now and it will not decrease wounding rates at all like i'm sure many will argue. SD GFP and SD hunters have to look at the big picture instead of the trend they are currently on of making hunting and killing game as easy as possible. I'm worried as harvest rates of deer across all seasons continue to grow GFP will have to increasingly limit season lengths and tag allocations thus limiting hunter opportunity and days spent in the field. Hunting isn't about how easy we can make it to kill something. As a avid muzzy hunter I'm against allowing powered scopes. Thanks for your time

---

**Michael Krein**

**Rapid City SD**

**Position:** other

**Comment:**

I think the regulations on scope power for muzzleloader during the muzzleloader season should be changed from fixed 1x scopes to scopes of either 1x4 or 1x6 power.

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**Dana Rogers**

**Hill City SD**

**Position:** oppose

**Comment:**

My comment is on the proposal to add higher magnification optics to Muzzleloaders. First off, the petitioners argument is a fallacy. There are opportunities to purchase 1x scopes in several places. 2nd, just because he happens to say he had difficulty getting one is no reason to change an entire rule. His muzzleloader came with open ( buck horn sights) and Red Dot or other holographic sights abound. If he wants to hunt with a muzzleloader he should have been prepared to hunt, not make excuses and try and change an entire season simply to suit himself.

Commissioner Bies brought up the aspect of Technology creep and the primitive nature of the Muzzleloader season during the Petition vote. I applaud that and whichever commissioner voted no to begin with. The fact this petition was pushed forward perplexes me greatly. My personal opinion and concern is the entire premise of the petition is not correct and keeping technology creep from causing seasons to change so dramatically that we lose them or the inherent value of them. By that I mean with archery and muzzle loaders, technology continues to move forward and is driven by manufacturers or people wanting to make things "easier". Once things become too "easy", harvest increases, more people are putting pressure on the resources and pretty soon GFP will then want to or have to act to reduce the impact. Thus losing the opportunity or reducing the opportunity through draw pressure. This 'should' be a short range type situation (IMO). With a variable scope on modern muzzle loaders my personal concern is it pushes ranges further. This is a line in the sand so to speak. We already have an any weapons season (rifle tags). 2nd and 3rd order effects to every change abound.

If someone doesn't like the rules already in place for a "primitive weapons season" like archery or muzzleloader, why in the heck are they even applying for said tag? The commission should NOT be in the business of making things "easier" but looking at decisions as a whole.

I'm sorry the petitioner's eyes aren't as good as they were when he was when he was 18 but mine aren't either. Allowing 1-4 or 1-6X scopes is totally unnecessary and a terrible move for the integrity of the Muzzleloader season.

All the petitioner would have to do is allow or WORK hard to get closer to the game. Making things easier is a TERRIBLE reason to make a change.

PLEASE vote this proposal down and keep our Muzzleloader season as it is!

---

**Carl Brakke**

**Presho SD**

**Position:** other

**Comment:**

Would like to voice my disappointment in the state of the water below the dam in pierre. We camped at #3 this last weekend and was amazed with the amount of dead fish and the smell of it. We boated on sat and wondered if there's a way not to have this happen. Curious, thanks for your time. Carl B

---

**Carol Risdall**

**Rapid City SD**

**Position:** other

**Comment:**

I have visited Pierre in past to scuba dive and enjoy downstream activities. I had noticed dead fish before but never to the extent I noticed around July 4th 2019. The stench of dead fish was every where. The dead fish numbers were actually more underwater, as seen scuba diving, then above, so I think things will just get worse as the bodies decompose and come up to the surface.

I have been to areas with dams where netting prevents the fish from going through the intake. It seems like a viable solution. At this point netting for clean up, rather than prevention, might help with the stench and decay of rotting fish in order to help keep the area bringing in visitors for recreational purposes. Ideally netting would be both for clean up and prevention of more fish getting sucked through the intakes.

It seems the end result will be a huge financial loss for our parks in the Oahe area if we allow more fish to die. It probably has already turned away visitors for this summer.

If there is any way I can make a difference- committee or letters I can write, or people I can contact- in order to help get funding to clean up our river, please direct me in the right direction.

A concerned citizen,  
Carol Risdall

---

**Dale Singer**

**Spearfish SD**

**Position:** support

**Comment:**

I am greatly in favor of allowing 1 to 4 power, or 1 to 6 power optics for muzzleloader seasons! The season occurs after hunters have been allowed to shoot at deer from greater distances with high powered optics, then the guy with a muzzleloader has to try to come behind and make shots on deer that are already skittish and gun shy. Muzzleloader hunters need to have the opportunity to and the availability to find and use the better options for optics! Thanks.

---

**Tim Ferrell**

**Sturgis SD**

**Position:** support

**Comment:**

I support a change that would allow muzzleloaders to use 1-4x or 1-6x powered scopes. It is in fact hard to find a proper 1x only option. It would also help to ensure better shot placement for a cleaner more ethical kill.

---

**Marty Keegan**

**Yankton SD**

**Position:** support

**Comment:**

muzzleloader optics, I am for this change.  
thank you

---

**Mark Peterson**

**Aberdeen SD**

**Position:** oppose

**Comment:**

Muzzleloader 1x Scope - totally against this. The muzzleloader season success rate will increase dramatically if this is allowed. Muzzleloader hunting should be open sights only and there are plenty of 1x scopes available if one knows how to use google. Peep sights are another great option that are currently legal.

Now if a person had vision issues I could see a medical exception similar to the exception used to allow disabled hunters to shoot from the vehicle.

---

**Gary Soupir**

**Watertown SD**

**Position:** oppose

**Comment:**

Hello,

This is just my opinion. But I feel more magnification means more longer range shots will be taken. With my 1x scope it's hard to shoot my muzzleloader past 150. With the same gun and a BDC scope I'll shoot it out to 300. Scopes make all the difference plain and simple. Not too mention more deer will be harvested due to higher success of a magnified scope. As far as crippling less deer.... sure you'll cripple less under 150 with a 4x vs a 1x. But guys will be taking longer shots with 4x. But you'll be crippling more deer over 150 with a 4x than guys wouldn't even attempt with a 1x. If you're worried about crippling less deer try working on your load development to be more accurate or hunt harder and get closer. I feel we are very fortunate to be able to use a 1x as an aiming reference. Sure 1x changed to 4x isn't that big of a change. But where does it end??? What's gonna stop guys from whining in 5 years saying they want 9x or 12x next??? The any deer muzzleloader tag is my favorite tag! Call me selfish but waiting 4-5 years on average to draw is long enough for me. If rules keep changing you'll make it easier to be success-full then you'll get more people applying. More magnification makes the firearm more accurate at longer ranges = more success = more people wanting to apply = lower draw odds = longer waits to hunt. No thank you! Please leave the scope restrictions as is. Thank you for your time and consideration.

---

**James (Jim) Twamley**

**Parker SD**

**Position:** oppose

**Comment:**

First let me say that hunting muzzleloader was originally set up as a Primitive Weapons Season and was set up as an Antlerless Tag. As the deer population increased this was changed to allow for 500 Any Deer tags and was then later increased to a 1000 tags. This was mainly do to hunters not being able to draw a rifle tag in their preferred unit and seeing this as a way to hunt their preferred unit with a firearm.

The 1 power scope was added originally to allow Handicapped Muzzleloader hunters, who for some reason, were not able to use the sights mounted on the muzzleloaders. It was later expanded to allow all muzzleloader hunters to use them. This was a determination that was allowed because the wanting to keep this season as a Primitive Weapons season and to allow hunters the opportunity to do so. In addition it was felt that limiting the optics on the muzzleloader to 1 power scopes it would also provide for a more humane kill with reduced wounding rates due to hunters taking shots at longer ranges.

By allowing variable power scopes you will effectively increase the shot ranges of these weapons thus making it another rifle season instead of a primitive weapons season its intended to be. All you have to do is look at the states that allow greater than 1 power scoped mounted muzzleloaders, to see how its affected their seasons.

The Commission has been saying that they want to allow more hunters to get their preferred unit tag, but by making it easier for hunters to use a magnifying scoped mounted muzzleloader to harvest a statewide "Buck" tag will only cause more restrictions on those counties that currently takes a lot of Preference Points to draw. This has been proven by the Departments own statistics as to how the number of available muzzleloader tags increased so did the interest of the unsuccessful Rifle Season (Any Weapon) hunters. The percentages of muzzleloader hunters who only hunt with is muzzleloader is less then 25%, the remaining 75% are dissatisfied rifle hunters looking for a way to have another opportunity to draw a tag and the whole month of December to fill it.

Finally, personally if the Commission feels that a change is needed to the Optics requirements currently used on a muzzleloader, I would suggest that the state adopts the same rule as in Colorado. In Colorado they only allow iron sights, which include Peep Sights and sights that have a fiber optics incorporated in them. They also only allow loose powder (no pellets), the projectile must contact the rifling on the barrel (no sabots), no electronic ignition devices but do allow 209 primers, #11 primers, and musket caps for ignition.

By incorporating these changes the Department and the Commission would go a long way in returning the Muzzleloader Season back to the Primitive Weapons season that it was historically intended to be.

Changes just to make it easier to do is not in the best interest of the hunter or the game animals we pursue. I say this as a person who is a Bowhunter who also hunts with a Muzzleloader and rifle hunts.

---

**Brooks Goeden**

**Yankton SD**

**Position:** oppose

**Comment:**

In my personal opinion, I can not support a change to the muzzleloader optics rules. There is no need to change the rules because of a lack of options for 1 power optics. If you ask me please leave rules for muzzleloader optics as is.

Thank you for your time and consideration

---

**Scott Johnson**

**Fort Pierre SD**

**Position:** support

**Comment:**

I support allowing up to a 6x scope on muzzle loader deer season. I myself have tried to aquire a 1x scope with no results. Due to the limited amount of any deer tags (1000) I don't think it will have much affect on the harvesting of more deer but will be much more accurate to pin point bullet placement and make a humane kill. Thank you for your time. Scott Johnson

---

**Tom Braun**

**Hot Springs SD**

**Position:** oppose

**Comment:**

After attending CWD forum in Hot S. a few months ago, reading about CWD programs, and now seeing proposed rules to control its spread---I commend you! However, it has been stated repeatedly in many states, that feeding big game, and baiting, help spread CWD, and should be avoided or banned. Yet in this same package of rules and changes, YOU PROPOSE TO EXTEND THE "BAITING SEASON??!!??" If any change is made, it should be to BAN BAITING, NOT ENCOURAGE IT! In addition to assisting the spread of disease, it's an ethical question. How much more is going to be done to make it EASIER to kill any big game animal, especially in archery seasons, where the original intent was to be challenged?

---

**Greg Stoebner**

**Webster SD**

**Position:** oppose

**Comment:**

I oppose the use of magnification optics ( variable power scopes ) on muzzle loader specific seasons. The whole point of the season is a limited range specific option of public enjoyment. IF objective was to kill deer, then we would add more tags in rifle season. IF you want to use a scoped muzzleloader, then use one during the regular firearms seasons, not modify this season. Aging eyes is not a valid reason. Either is ethical shot placement, because if you cannot place an ethical shot, you should not be out hunting until you can- regardless of harvest method. Please see these vendors:

<https://vortexoptics.com/catalog/product/view/id/3447>

<https://www.natchezss.com/thompson-center-hawken-hunter-muzzleloader-scope-1x32mm-matte-black.html>

<https://www.natchezss.com/weaver-kaspa-hunting-series-rifle-scopes-1x20mm-88-4-13-matte.html>

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**Chris Manson**

**Brookings SD**

**Position:** other

**Comment:**

I'm against any changes from the current muzzle loader scope restrictions.

---

**Bret Brown**

**Sioux Falls SD**

**Position:** support

**Comment:**

I don't really understand wanting to restrict the scope size, you only get one shot and I don't want to wound a deer and watch it run off to die knowing the odds of recovery are slim. One problem with this restriction is that I'm guessing there aren't any really good scopes in the proposed optics. Let's not forget that a great 3x9 scope isn't going to increase the range of even a modern day muzzleloader to more than a couple hundred yards.

---

**Norman Carda**

**Yankton SD**

**Position:** support

**Comment:**

I am in favor of allowing 1x6power scope for muzzle loader hunting.

---

**Jeff Sorensen**

**Viborg SD**

**Position:** support

**Comment:**

I support allowing scopes with magnification for use on muzzle loading rifles.

---

**Michael Podhradsky**

**White SD**

**Position:** support

**Comment:**

The scopes to 6 power on muzzleloaders should be allowed. It only increases a better shot placement.

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**Michael Podhradsky**

**White SD**

**Position:** oppose

**Comment:**

I think this new way of deer hunting drawings is a joke. Non of my family got any tags they applied for. I was very disappointed. This was a terrible idea and needs to be redone.

---

**Jeff Sorensen**

**Viborg SD**

**Position:** support

**Comment:**

I am in favor of allowing scopes with magnification for muzzleloader rifle hunting.

---

**Chet Barney**

**Vermillion SD**

**Position:** support

**Comment:**

I support the proposed change to allow for telescopic sights on muzzleloaders.  
If not, muzzleloader season should be put before the rifle hunts, and during the rut.

---

**Rick Hanger**

**Sioux Falls SD**

**Position:** oppose

**Comment:**

I am opposed to allowing magnification in scopes for the muzzleloader season. The reason given for the change is bogus. Non magnified scopes are easy to find. I checked in Sioux Falls and found many available options. I also checked on line and found a myriad of options available. Muzzleloader season is supposed to be harder. The whole purpose is to be primitive. I believe it should be restricted to open sights without any electronics magnified or otherwise. Anyone who wants to use a big scope on their inline can do so during the regular firearms seasons. Muzzleloader season should be kept traditional and primitive. Technology is taking the challenge out of many of our pursuits. I think GFP should be helping to hold on to traditions, not setting them aside for technology. Please do not allow magnification during the muzzleloader season. Change just for the sake of change is always a fools errand.

---

**Ron Laughlin**

**Rapid City SD**

**Position:** oppose

**Comment:**

Re: allow 1x-4x, or 1x-6x optic because 1x not available.

There are several 1x scope available for purchase.

1. Sightmark 1x at amazon
2. Weaver 1x at Natchez
3. Sightmark 1x at Sportsmans Guide
4. 1x at Thompson Center
5. 1x scope on eBay.

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**Chuck Jensen**

**Onida SD**

**Position:** other

**Comment:**

I'm against the muzzleloader scope change. In 30 seconds in typed 1x muzzleloader scope into google and can up with several options. The scopes are out there so don't fall into that notion. You guys talk about wounding loss but instead of guys shooting out to 100 yards with 1x scopes you will now have guys shooting out to 200 plus. Wounding loss isn't going to decrease. If guys want use higher powered muzzleloaders they can use them during the rifle season. You can't always try to make hunting as easy as possible and this proposal is just that. Leave the scope restriction as is at 1x scope.

---

**Chris Streit**

**Oregon IL**

**Position:** oppose

**Comment:**

I realize this is too little too late, as I was unaware of the comment period until after changes for nonresident archery deer hunting regulations had been changed.

I'm from IL, I love hunting in SD. I will not be able to hunt SD this year due to the timing of the changes. My work doesn't allow me to change my vacation days. I had requested a week off to bow hunt west river deer from Sept 15-21. Then I receive an email that I can't. The season dates were set, then you changed the rules in the middle of the game! Now I'm screwed out of my vacation time and I can't go hunting where I planned, and I only applied for preference points in other western states. My only option is NE OTC, so I guess that's where I'll be spending my money this year.

So what gives? Why the late change? And why target NR?

You wouldn't do this to NR pheasant hunters.

---

**Mark Smedsrud**

**Hartford SD**

**Position:** oppose

**Comment:**

I oppose changing the optics requirements for muzzleloader rifles during muzzleloader season. The statement that it is difficult to find legal 1 power optics is simply not true. I bought a 1 power scope at Scheels in Sioux Falls. I also saw many for sale online. Please keep this requirement as is. Part of the challenge of hunting deer with a muzzleloader is getting close enough for a good shot. Thank you.

---

**John Rolloff**

**New Ulm MN**

**Position:** other

**Comment:**

I bought a seasonal license in April of this year. The place I bought it from said they were having problems with the machines. Well I got a license, but I never looked at it and just put it in my wallet. It turns out it has someone else's name on it. It is for someone in Nebraska. I would like to find out what my options are. You can call me at 507-359-2259 Thank you

---

**Dale Gregg**

**Whitewood SD**

**Position:** support

**Comment:**

Muzzle loader optics. Having had the opportunity to muzzle loader hunt in several states. I can attest the positive of having a powered scope. Rarely does one get the opportunity to harvest with open sites given that most opportunities are in low light situations morning and evening. Secondly the season dictates that in SD there is a high % of lack of sun and winter conditions. Open sites or red dot does not provide a quality site picture and limited range. Finally, the likelihood of a poor shot is reality. What I'm not in favor of is 350yd muzzle loaders. Your basic in line may be good to 200 max. Currently the lack of quality and availability of Zero power scopes creates very limited for us hunters. Thanks

---

**Anthony Filholm**

**Brookings SD**

**Position:** oppose

**Comment:**

I am opposed to changing the current optics rules for muzzle loaders. There are 1X scopes available online. It took me less than a week to get one. It is supposed to be a primitive weapons season. People will be inclined to unethically take longer shots with higher power optics.

---

**Jason Smith**

**Pierre SD**

**Position:** support

**Comment:**

I AM IN SUPPORT OF CHANGING THE MUZZLELOADER LAWS TO ALLOW LOW POWER SCOPES. THE COMMISSION HAS MADE THE DECISION TO MAKE A SEPERATE MUZZLELOADER ANY TAG SO PLEASE ALLOW THOSE THAT DRAW TO USE A SCOPE. AS WE ALL AGE IT IS GETTING TOUGHER TO USE IRON SIGHTS AND RED DOT SCOPES THAT COVER MOST OF THE ANIMAL UP AT 100 YARDS.

---

**Pat Malcomb**

**Sioux Falls SD**

**Position:** oppose

**Comment:**

The first deer draw is complete using the new draw plan. I for one don't like it and if you are going to keep it there needs to be changes. Personally I think it was a flop. One thing that needs to change is the second choice option, If my first choice is west river deer any deer why does my second choice also have to be west river deer? Why can't my second choice be black hills or muzzleloader? I only hunt one county and if I can't get my first choice I want a chance at another tag. Then second season I put East River and same story I only hunt one county so my second choice why do I have to put another east river county? Why not black hills for my second choice or muzzleloader? If you are not changing back which I am in favor of you need to set up the current application system so you can apply for any season as choice two and not the same season as your first choice.

Thank you Pat Malcomb

---

**Ron Laughlin**

**Rapid City SD**

**Position:** oppose

**Comment:**

RE: allowing 1-4 scope for muzzle loader.

Petitioner say 1x scope not available for purchase.

Here is one available for purchase :

<https://www.cheaperhandirt.com/sightmark-core-sx-1x24mm-shotgun-scope-sm13063/FC-812495020162.html>

Here is another: <https://www.amazon.com/Thompson-Center-Rifle-Scope-1X32Mm/dp/B000JP4K4S>

Here is another: <https://www.natchezss.com/weaver-kaspa-hunting-series-rifle-scopes-1x20mm-88-4-13-matte.html>

Thank you.

Ron

---

**Lonny Kracht**

**Sturgis SD**

**Position:** oppose

**Comment:**

This if the first time in 48 consecutive years of hunting that I have been unsuccessful in the 1st and 2nd draws for a deer tag (other than archery). It is what it is I guess. Don't know what to think.

---

**Rod Vaughn**

**Fort Thompson SD**

**Position:** other

**Comment:**

I live in Buffalo County South Dakota. There is now a large and viable wild turkey population within the county. Please open Buffalo County to Spring Turkey Hunting. There are several of us who would like to shotgun hunt turkeys in the spring on our land and on the Corps taken lands within Buffalo County. Thank you.

---

**Bryan Johnson**

**Fort Thompson SD**

**Position:** other

**Comment:**

Add Spring Turkey shotgun season in Buffalo County, SD.

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**David Schwantz**

**Elko New Market MN**

**Position:** other

**Comment:**

I told you to remove me from your mailing list after your stupid changes to the hunting laws and lottery. I will never hunt SD again.

---

**Rolf Johnson**

**Rapid City SD**

**Position:** oppose

**Comment:**

Is there any way to stop people from disposing of their deer carcasses by dumping them in the hills. They obviously know it is wrong because they never leave the leg with the tag. Could a message of some kind be included with the license?

---

**Aaron Vaughn**

**Fort Thompson SD**

**Position:** other

**Comment:**

Can Buffalo County please be added to the spring turkey season? In the last 5 years I have seen a steady increase in the turkey population in Buffalo County, and I would love the opportunity to hunt closer to home with my son. Thank you very much for your consideration.

---

**Jim Jessen**

**Woonsocket SD**

**Position:** other

**Comment:**

My comments are in regard to the change of the dead line for East River Deer being moved way up. I think the commission should of done a better job of informing the public about this change through whatever means. I completely missed the first drawing because I had no idea the date had been moved up and had the GF&P had my E-mail address in there system all screwed up or maybe I would of known. So, I ended up put in for the second drawing, which I put in for as soon as possible because I missed the first drawing. Well, I didn't draw a tag during this drawing, even though I put in early. I thought it used to be first come first serve on leftover licenses, but apparently not, anyway if there going to change something that's been the same for many years they need to do a heck of a lot better job of letting the public know.

---

**Susan Braunstein**

**Rapid City SD**

**Position:** oppose

**Comment:**

I know it is impossible for this year but please don't consider the nest predator program for next year. It is a cruel and non-productive method to increase habitat for commercial hunting enterprises. Thank you.

---

**Jaleana Dixon**

**Rapid City SD**

**Position:** support

**Comment:**

No comment text provided.

---

**Adam Blanchette**

**Cadott WI**

**Position:** oppose

**Comment:**

I have never hunted your state but have always wanted to try the early season and chase after a velvet buck. Here in Wisconsin our season opens later not allowing for the chance at a velvet deer so the Western states have always been a great option for an early season hunting opportunity. It's sad to see a tradition change unless the justification for doing so is for a true benefit to the natural resource being managed. This feels more like a complaint of local hunters against the non resident hunters.

I feel that applying the new non resident start date will greatly impact your states license sales, which in turn impacts a lot of local businesses that the out of state hunters utilize and support as well. If your deer herd is struggling and needs less pressure then I get that and support that, but there are other options to achieving that. There might be some adverse side effects to this rule that will decrease funding for your department and cities that may out weigh the issue of non resident hunters being able to start the bow season when the residents can.

What is the main driving reason for this proposed change? Resident hunter complaints? or is it truly a deer management move that is intended to help the herd in a way? Why not have a draw system in place if it is herd management related?

Regardless good luck on your decision, hopefully the outcome is what you desire and if not that it reverts back to the way it was so that I can bring my now 9 year old son out there to chase some early season velvet bucks in the near future when he is ready. Thanks and have a great day!

---

**Kevin Bryant**

**Box Elder SD**

**Position:** support

**Comment:**

I took a tour of Ft Sisseton last week and was very impressed of the fort, the grounds and especially with our tour guide Malinda. She was very informative of the history of the fort and made the tour most enjoyable. Thank you.

---

**Leonard Spomer**

**Pierre SD**

**Position:** oppose

**Comment:**

I am commenting on the petition to increase the muzzleloader optics to something greater than 1x.

The petitioner is correct in saying that most 1x scopes have been discontinued.

However there is a better option in the form of red/green dot sights with 1x magnification. The 2019 Vortex catalog lists at least four 1x red/green dot sights that would work on a muzzleloader. There are literally scores of red/green dot sights available from multiple manufacturers.

The reason I oppose changing the magnification to a higher power rating is that the muzzleloader technology is changing rapidly, and making them more lethal at greater distances.

The new 2019 CVA Paramount muzzleloader is capable of very long shots. Their own catalog says "provides the higher velocities necessary for killing shots at 300 yards and beyond".

If you allow higher scope magnification along with the higher velocity muzzleloaders than you have just created another "rifle season".

Lets keep the muzzleloader season as it is.

Thank you.

---

**Rich Simonsen**

**Sioux Falls SD**

**Position:** oppose

**Comment:**

Just a suggestion. If the state chooses to stick with the new deer application process, (not a fan), you might want to consider going to a highest preference draws first point system like Colorado versus weighted. For some of the harder to get tags, (Custer deer, refuge deer, etc.) there is very little reason to keep paying the \$5 for preference points, if it really does not help your chances. This will be a lost revenue source for the state.

---

**Chad Carlson**

**Ottumwa IA**

**Position:** oppose

**Comment:**

My name is Chad and I live in Ottumwa, Iowa. I am 34 years old and a City Public Works employee. I'm reluctant to say I'm an "avid" archer and outdoorsman, but I think most would say I am. I am known as a quiet, polite and rational guy and I would like to offer my level headed, honest insight of how these new changes will not only affect myself, but all those in our hunting group who love to hunt South Dakota. I hope you will read my entire letter to the end.

Like many big game hunters, our core group of friends and family "play" the western big game points draw. Every spring, year after year, we put our names into those many hats in hopes of drawing that coveted tag. The reality of the matter is, it's a very rare occasion that any of us actually pull one of those tags. Regardless, every spring it's easy for big dreams to run rampant. Despite those big dreams, come August, when all the draw results are finally tallied, we more often than not are all left looking for a "Fallback Plan". Over the years, this "fallback plan" has become more of an annual event; to hunt South Dakota archery deer, and we have grown to absolutely LOVE IT! A guaranteed archery tag that we can purchase late summer/early fall AFTER results are

in from all the western draws, reasonable tag prices, more public ground than a person could cover in a lifetime and for us at least, a very enjoyable, relaxing experience staying in small town hotel, eating a good steak and cold beer at the end of the day. It's an awesome way to kick off the fall hunting season and we have truly come to love hunting South Dakota.

I receive email publications from the South Dakota Game and Fish and I've been trying to stay up to date on the proposed changes. I am quite disappointed (and confused) to see that several of the proposed changes have been adopted.

1.) Application Deadline. Creating a deadline of August 1st for those of us hunting public lands is tough, and a little inconvenient, but... it's doable. However, changing the deadline to April 1st, will all but rule hunters like us out. At the time of writing this, I can think of 11 of my friends and family who currently hunt South Dakota. In my one group alone, we have give or take 7-8 hunters. For all of us, one of the great aspects of this hunt is the flexibility in acquiring a tag. Every-single-one of us (in our core group) puts in for harder draw tags in multiple western states. We typically won't even see results for those tags until May, June, July and in some instances August. Speaking for myself, I make a modest income and am only granted so many days of vacation a year, resulting in 1 hunting trip per year. I feel like my situation represent a LARGE population of hunters. If the deadline is moved up to April 1st, I WILL NOT be applying for a South Dakota archery tag and doubt anyone else in our group will either. It is very disappointing.

2.) Start Date. What is the reasoning behind pushing the start date back? I can "kinda" understand if it's to accommodate Residents, but a whole month? I'm pretty well versed with Midwest and western state regulations. I can not recall a single state that delays a start for Non-Residents? Is that even legal? Nonetheless, our group has hunted all over the western 1/3 of the state. Yes, there are hunters, but NEVER have we found a piece of public land that is overwhelmed by hunters, Resident or Non-Resident. Where our group has now hunted for the last 7 years, it's EXTREMELY RARE we even see another hunter.

Like I mentioned earlier, this trip has become our annual "start" of Hunting Season. By October 1st, deer season has now started in Iowa, Wisconsin & Minnesota (where our hunting group is from). We are all avid hunters and by then we're going to be chasing the deer we've been scouting all year. Last years September 1 start date was a real teaser! We love chasing muleys in Velvet!!!!

As for money goes, quite honestly I don't care at all about hunting tags and state revenues... honestly I kinda hope the state is shooting itself in the foot. What I do care about and am afraid for, are the local economies of small towns like the one we have come to love. When I call to book 4 hotel rooms every year, and the hotel owner says "I've been waiting for your call!", that's saying something about the importance of us pumping our money into that family owned business. When we go to the ONLY still-running bar/restaurant in town and the owner/bartender immediately remembers us (maybe not by name) but remembers us and knows we are there to hunt, he is genuinely HAPPY to see us, and takes the time to talk with us... that says something about the importance of us spending our money in his business. I honestly fear for those small businesses that certainly benefit from our out-of-state money.

I HAVE TO believe our group of hunters represent a large group of Non-Resident hunters. The changes made seem peculiar and I have a hard time understanding the reasoning. Our draw to hunt South Dakota is the Opportunity of the hunt. For the last week +, since we saw the changes were to take affect, our core group has been in constant chatter... the changes feel like a low-blow. For sure, 5 of our core group guys (including me) WILL NOT be hunting South Dakota this year and the remainder of the guys are currently at-a-loss. Half the fun is hunting as a group. I would not be surprised at all if everyone in our core group say "the hell with". It's very disappointing.

I'm really not one to complain... I'm much more of a go-with-the-flow type and understand that change is inevitable, but this has us all shaking our heads.

I appreciate you taking the time to read my concerns and hope you will keep them in mind.

---

**Tom Rakow**

**Silver Lake MN**

**Position:** oppose

**Comment:**

I just saw these changes. I have loved hunting South Dakota with Archery for the last 14 years. With these changes I will begin looking to other states to spend my bow hunting dollars

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**Dean Bortz**

**Woodruff WI**

**Position:** oppose

**Comment:**

I know this is probably going to go straight to your circular data file, but I'm writing anyway to say that I am very disappointed (you can interpret that to mean extremely frustrated and beyond) that South Dakota changed its non-resident archery deer application / season process. Your previous system allowed us the flexibility to make a trip to South Dakota if our schedules opened up in the fall, something we wouldn't necessarily know prior to this year's Aug. 1 and next year's April application deadlines. I really can't imagine why you would ditch your previous process unless you're looking for fewer non-resident archery deer hunters. If that's your goal, you've succeeded. I filed my comments opposing the change prior to the deadline for your earlier public comment period on this proposal. Obviously I must have been on the short end of sentiment. I had hoped to be able to sneak in an archery deer hunting trip to the Black Hills National Forest in October and would have stayed in Hill City or at Mountain Meadows, where I've stayed in the past. I wouldn't know if I would be able to make that trip until late September or early October. Under the previous system, I could still have applied for an archery license at that point. Now, no. I'm not going to gamble the cost of an archery license prior to Aug. 1 this year, or in April next year, not knowing whether I'll actually be able to make the trip. That was the real beauty of your previous system. Those of us with flexible schedules could count on the West River Region or Black Hills for a quick four- to five-day hunt if time allowed. Now that idea is out the window. I have introduced a good friend to turkey hunting and archery deer hunting in the Black Hills. Shane has made many turkey hunting trips with me over the years and has now been to your state for two archery deer hunts with me. This fall he was going to bring his wife – Amber also bowhunts – to Rapid City / Hill City for her first trip. They were planning on the last week of September. Guess what? They are no longer going. With Shane's work, October is a difficult time to get away. Late September is his only option for an out-of-state bow hunt. He'll now be looking for a different state to visit.

I have a hard time believing South Dakota is overrun with non-resident bowhunters to the point that you need to make this change. During the two most recent seasons that I bowhunted in the Black Hills with Shane the only other hunters we saw were resident rifle elk hunters. If we walked into a store or restaurant wearing camo people would look at us and ask if we were elk hunting. They would get a very puzzled look on their faces when we told them we were bowhunting deer. Their reply would typically be that they didn't know of many people who bowhunted deer.

I also take huge exception to the fact that you're telling me that I can't hunt in the Black Hills National Forest in September. While the BHNF is within SD borders, that forest belongs to every U.S. citizen, not the state of South Dakota. That's not right.

I used to be a huge fan of your state. I started turkey hunting in South Dakota in 1999 or 2000 and have been out there just about every spring for turkey hunting. I think it was 2004 or 2005 when I drew my first pronghorn tag and Black Hills rifle deer tag. Your season frameworks, license / application system and web site always made sense and were easy to use. But I just cannot support this latest move. You've taken away the one thing that allowed us to make a "short notice" bowhunting trip to your state and the closing off of the national forest and BLM lands to non-residents in September is simply un-American.

---

**Jonathan Way**

**Osterville ME**

**Position:** oppose

**Comment:**

I just returned from an amazing 3.5 week trip out west including 2-3 days in Wind Cave NP and Custer SP. I was amazed at how many bison there were and loved the experience other than seeing all of the fences and wish they had more room to roam... I understand because of these fences that some animals - most notably the ungulates especially the elk - have to be managed to desired population sizes but I find it incomprehensible that cougars are actively hunted in a world famous state park like Custer. And looking at the 2018 kills ("harvest") many of the lions killed statewide were there. I know the folks at South Dakota Fish and Parks understand cougar/carnivore biology and can't believe that predator hunting is allowed there. That completely changes my opinion of this 71,000 acre park and how it is managed. Cougars live at low numbers and the park is not that big compared to their biological needs. Why can't they have this one refuge?

And, also, I spent over a week on South Dakota on my trip and also find it repulsive that lions can be killed year-round outside of the Black Hills. What about the Badlands? The thought that every time a lion steps out of Badlands NP, another great place, that it can be killed year-round is unbelievable. Please consider wildlife lovers when designing such needless hunting seasons. There is no need for a year-round season on these animals except in defense of property

---

**Troy Miller**

**Sioux Falls SD**

**Position:** oppose

**Comment:**

I just wanted to give my thoughts on the new system.

I typically just draw one deer tag per year (either east river, west river, or black hills). I try to accumulate preference points if I'm not hunting a particular unit that year. This year I wanted to try west river for the first time and I had 3 preference points. I didn't want to run the risk of drawing two tags, so I applied for west river only thinking that I would probably draw a tag with my preference points but if not I would reapply for a different unit in the 2nd draw. Well, looking at the map there is pretty much jack squat left for the 2nd draw. This new system is going to encourage everyone to apply for multiple units in the first draw and run the risk of drawing two tags even if they don't really want 2, because the alternative might be that they don't draw any tags (as I found out). The old system was better with the drawing occurring at different times because if you didn't draw a tag for one season, you still had a fair shot at another. The 2nd draw appears to be a joke (nothing left).

---

**Clay Pederson**

**Morristown SD**

**Position:** other

**Comment:**

Looks like SDG&F is a fee hunting operation with a raffle like this.

Why don't you utilize those PR Funds correctly and you wouldn't need supplemental raffles!!!

---

**Jeremy Scegura**

**Holdingford SD**

**Position:** oppose

**Comment:**

I was considering a raffle donation for the hunt for habitat. I am a non-resident but have many friends in the state, and spend a fair amount of time fishing and hunting in SD. While reading the raffle rules I see that non-residents are limited to one winner on option one. So as I understand it, if my name is the second to be drawn, and the first was another non-resident, I don't win. Remember that I paid double for my ticket as a non-resident. Ridiculous! This is a RAFFLE, not a tag drawing. I understand that many states give preferential treatment to their residents on tag drawing, and I get that. This is going too far, and I hope other non-residents read the rules and are smart enough not to buy your raffle tickets. Despite my personal desire to support wildlife project fundraising, the way you have set this up is so irritating that I can't get past it.

Please pass on this note to whoever is in charge of organizing this raffle.

---

**Chad Bjorgaard**

**Bemidji MN**

**Position:** oppose

**Comment:**

I hate the new system. Now, instead of waiting and biding my time to draw, I may never draw. This system effectively eliminates that. I could have 20 preference points and still not draw. This is supposed to help with hunter recruitment? By increasing people's frustration? If I would have known you were going to change it like this, I would have never started buying preference points in the first place. I have always been happy with the State of South Dakota and the way their licensing system is run. But, this, in my eyes, is a horrible fail and is a complete disservice to the loyal outdoorspeople that frequent your state. I finally had enough points saved where my son and I should have had a very good chance of drawing, instead, someone who had less points than us drew instead. I guess we will start exploring another state to hunt that isn't about participation trophies for people that haven't earned them. Shameful!!!

---

**Loren Clayton**

**Omaha NE**

**Position:** oppose

**Comment:**

Our NE Douglas County BassMasters Club was informed that the length limit regulations for bass have changed for your "Trophy Lakes." We would encourage the State of SD to change them back to what they have been for years in the past. Our club holds club tournaments in IA, MO, KS, and OK. Our records consistently show that we catch more lbs. of fish when we fish either Francis Case or Lake Sharpe, and Roy Lake. It's the only reason we drive for 6 hours to fish in your state. We feel after 2 yrs after the regulations change, the fishing will be the same as the other states where we fish. Multiply that times the number of other clubs going to your state for the same reasons and that adds up to a lot of revenue not being spent. We are associated with BassMasters and thus are obligated to "catch and release." We have a lot of fun, because we usually all catch our five fish tournament limit, weigh in, and then release them. We tell others how much fun we have, show pictures, and tell the lengths/weights. That in and of its self draws more tourism. We ask "the powers to be" to please reconsider changing the regulations back to what they used to be. We thank you!

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**Loren Clayton**

**Omaha NE**

**Position:** oppose

**Comment:**

Our NE Douglas County BassMasters Club was informed that the length limit regulations for bass have changed for your "Trophy Lakes." We would encourage the State of SD to change them back to what they have been for years in the past. Our club holds club tournaments in IA, MO, KS, and OK. Our records consistently show that we catch more lbs. of fish when we fish either Francis Case or Lake Sharpe, and Roy Lake. It's the only reason we drive for 6 hours to fish in your state. We feel after 2 yrs after the regulations change, the fishing will be the same as the other states where we fish. Multiply that times the number of other clubs going to your state for the same reasons and that adds up to a lot of revenue not being spent. We are associated with BassMasters and thus are obligated to "catch and release." We have a lot of fun, because we usually all catch our five fish tournament limit, weigh in, and then release them. We tell others how much fun we have, show pictures, and tell the lengths/weights. That in and of its self draws more tourism. We ask "the powers to be" to please reconsider changing the regulations back to what they used to be. We thank you!

---

**Virginia Matney**

**Atlantic Beach NY**

**Position:** support

**Comment:**

Please HALT this CRUEL bounty trapping program on PUBLIC lands!

I am a taxpayer and I absolutely abhor this horrific practice in any state, in any form, on any public lands.

I will NEVER visit your state as long as this viscous policy remains in effct.

---

**Kevin Crupi**

**Marquette MI**

**Position:** oppose

**Comment:**

I was very disappointed to read the Game Fish and Parks Department recently approved a date extension for trapping on public lands and has increased the amount of animals allowed to be trapped, killed, and have their tails cut off to 50,000. There's no excuse for cruel trapping in an advanced society like the 21st Century U.S.

Already, over 22,000 animals such as raccoons, opossums, red foxes and badgers have been caught and killed by traps in South Dakota, where trappers receive a \$10 bounty for every animal tail turned in. Animals caught in traps sometimes suffer for days before the trapper returns and kills the animal. Non-target species and even some pets are caught in cruel traps.

Killing programs like this barbaric, state-sponsored trapping bounty hunt are cruel, out-dated and simply do not work. A recent study in the journal Frontiers in Ecology and the Environment found that there's little scientific evidence that killing predators actually accomplishes the goal of protecting other species.

These killing programs are ineffective and only serve as a way to reward and encourage trappers and hunters instead of promoting non-lethal solutions. Wildlife species should be revered not only because they are sentient beings but because the health of our ecosystems depend on them. Please reverse your recent decision to extend cruel trapping in South Dakota. Thank you.

---

**Matthew Nelson**

**Webster SD**

**Position:** support

**Comment:**

Muzzleloader Optics Change HB 1006

I am in favor of muzzleloader hunters to use 1-4x or 1-6x powered optics during the muzzleloader deer season due to the fact that it is hard to find a legal 1x power scope. I also feel that there would be less deer wounded having better optics. Tags for this season are sparse, so I feel that bettering the deer harvest odds would be greater and hunters would be more successful and have more interest in applying for this season in the future having better optics on their muzzleloaders.

---

**Mu Naw**

**Huron Sd SD**

**Position:** other

**Comment:**

No comment text provided.

---

**Dan Buehner**

**Sioux Falls SD**

**Position:** support

**Comment:**

I'm writing regarding the proposed muzzleloader optics change. I support allowing magnified scopes but would not limit it to 1-4x or 1-6x as proposed. Since the proposal originated due to the difficulty of finding a 1x optic, it's much easier finding optics that go beyond 4-6x. I work in a large sporting goods store and there are very few optics that would meet the 4-6x requirement. I urge the commission to allow all levels of magnification for the following reasons: 1) many muzzleloaders now come with factory-installed variable power optics; and 2) additional magnification will provide more accurate, lethal shots.

---

**Ed Hiller**

**Arlington SD**

**Position:** oppose

**Comment:**

muzzle loaders should not be allowed to use rifle scopes during the muzzle loader season. this is supposed to be a primitive hunt.

---

**Howard Smith**

**Piedmont SD**

**Position:** oppose

**Comment:**

i am landoner in trip co and mellete county and never have had to send landoner preference guess what i couldnt draw a tag this year with your new system thank you

---

**Maura Lucus**

**Malibu CA**

**Position:** other

**Comment:**

Please stop the hunt of mountain lions in South Dakota. Each survivor is irreplaceable and precious.

---

**Russell Frizzell**

**Olympia WA**

**Position:** other

**Comment:**

The South Dakota Lion Management Plan should consider that mountain lions are important participants in the circle of life and should be protected.

---

**Blair Voltz**

**Chesterfield VA**

**Position:** oppose

**Comment:**

This draft plan is designed to manage mountain lions for maximum trophy hunting opportunity, not for conservation

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

Non-lethal methods are more effective and last longer.

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

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

---

**Anna Brewer**

**Phoenix AZ**

**Position:** oppose

**Comment:**

<https://mountainlion.org/ActionAlerts/070119SDMgmtPlan/2019-07-25-SD-Draft-Lion-Plan.pdf>

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

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

Non-lethal methods are more effective and last longer.

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

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

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

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

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

---

**Mikki McBride**

**Stockton CA**

**Position:** support

**Comment:**

Please, for God's sake, don't kill the mountain lions. They are a big part of our ecosystem just as the wolves are. Let them live. They have a right to life just as we humans do. We have moved into their habitats. Not the other way around. Learn to live with them or move out.

---

**Mikki McBride**

**Stockton CA**

**Position:** support

**Comment:**

Please, for God's sake, don't kill the mountain lions. They are a big part of our ecosystem just as the wolves are. Let them live. They have a right to life just as we humans do. We have moved into their habitats. Not the other way around. Learn to live with them or move out.

---

**Monica Riedler**

**Washington DC**

**Position:** oppose

**Comment:**

Please don't kill mountain lions!!!

---

**Irmgard Guttersohn**

**El Paso TX**

**Position:** support

**Comment:**

The SDGFP guesses that there are 111 to 970 mountain lions statewide. What if there are only 111 or 120? Then 60 mountain lions would be half of the population! It could drive them close to extinction! Please, don't issue hunting permits!

---

**Amy Brown**

**Ellendale ND**

**Position:** oppose

**Comment:**

To Whom It May Concern,

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

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

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

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

Mountain lions regulate their own numbers and do not require intense management to limit their populations.

Hunting is a bad tool, killing the lions least likely to come into conflict with people, pets and livestock, and creating more space for young dispersing lions that are most likely to come into conflict. Research at the Washington State University Carnivore Conservation Laboratory found that heavy hunting of cougars actually increases conflicts between humans and cougars. These findings run contrary to presumptions of wildlife management programs designed to continually increase kill numbers. Non-lethal methods are more effective and last longer.

Killing female mountain lions results in the orphaning of their kittens. Hunting leaves kittens to die from starvation, dehydration, and exposure. Juvenile lions that haven't developed the skill set needed to hunt prey animals are more likely to target opportunistic prey such as domesticated livestock and pets.

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

Thank you for your time,

Sincerely,

Amy Brown

---

**Mira Billotte**

**Los Angeles CA**

**Position:** oppose

**Comment:**

This draft plan is designed to manage mountain lions for maximum trophy hunting opportunity, not for conservation.

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

Non-lethal methods are more effective and last longer.

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

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

Please revoke the hunting licenses for Mountain Lions, they are a very small population.

Thank you for reading.

Mira Billotte

Los Angeles, CA 90026

---

**Heather Feeley**

**Media PA**

**Position:** oppose

**Comment:**

Hello. I am kind writing in regards to the hunting of mountain lions. Please take into consideration that Mountain lions regulate their own numbers and do not require intense management to limit their populations.

Hunting is a bad tool, killing the lions least likely to come into conflict with people, pets and livestock, and creating more space for young dispersing lions that are most likely to come into conflict.

Killing female mountain lions results in the orphaning of their kittens. Hunting leaves kittens to die from starvation, dehydration, and exposure. At the very least Non-lethal methods are more effective and last longer.

With such a small population we ask that you please ban any hunting in the near future. Thank you.

---

**Staci Downey**

**Overland Park KS**

**Position:** oppose

**Comment:**

I oppose any kind of Mt Lion hunt! Their numbers are way to low to justify killing any of these beautiful and necessary cats. We visit S Dakota for the wildlife like so many people and all wildlife needs to be protected. They belong there and regulate their own populations!

---

**Adam Martin**

**Boulder CO**

**Position:** oppose

**Comment:**

I appose the mountain lion hunt and would like to see little to no quota in order to save their population

---

**Shauna Stannard**

**Boulder CO**

**Position:** oppose

**Comment:**

I oppose hunting of mountain lions.

---

**Wendy Roth**

**Rapid City SD**

**Position:** oppose

**Comment:**

This draft plan is designed to manage mountain lions for maximum trophy hunting opportunity, not for conservation.

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

Non-lethal methods are more effective and last longer.

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

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

---

**Cindy Letchworth**

**St Louis MO**

**Position:** oppose

**Comment:**

Please stop the killing of mountain lions. These animals are vital to the ecosystem. By killing up to 60 individuals you are making it impossible for genetic continuance. Don't we have more serious problems than killing all the mountain lions? Please stop this unnecessary killing.

---

**Luke Dummeldinger**

**West Chester PA**

**Position:** oppose

**Comment:**

Please end mountain lion hunting in South Dakota

---

**Christy Bolle**

**Monrovia CA**

**Position:** support

**Comment:**

It is extremely important to save, protect& support mountain lions, they are amazing, majestic creatures that deserve to be here!! They are just trying to survive like us!! They have Gorton a bad reputation by IGNORANT people!! We're the only ones destroying the planet & wiping out other species!!! Help help save & support mountain lions NOT KILL them!!!

---

**Kristen Hart**

**Portland OR**

**Position:** oppose

**Comment:**

I am writing in opposition to the proposed Lion Management Plan on account of the following:

This draft plan is designed to manage mountain lions for maximum trophy hunting opportunity, not for conservation.

Mountain lions regulate their own numbers and do not require intense management to limit their populations.

Hunting is a bad tool, killing the lions least likely to come into conflict with people, pets and livestock, and creating more space for young dispersing lions that are most likely to come into conflict.

Non-lethal methods are more effective and last longer.

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

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

Sincerely,  
Kristen Hart

---

**Darral Beshara**

**Sturgis SD**

**Position:** oppose

**Comment:**

Deerfield lake is one of the most beautiful and tranquil lakes in the black hills. Let's keep it that way. No! Don't remove the no wake rule.

---

**Darral Beshara**

**Sturgis SD**

**Position:** oppose

**Comment:**

Deerfield lake is one of the most beautiful and tranquil lakes in the black hills. Let's keep it that way. No! Don't remove the no wake rule.

---

**Jason Taylor**

**Fort Pierre SD**

**Position:** oppose

**Comment:**

**Muzzleloader Scope Proposal**

I am against allowing scopes above 1x power on muzzleloaders. There are hunters out there that don't put in for muzzleloader because they currently have to use open sights or a 1x power scope, changing that regulation and opening it up, will make the hunt easier and will make the tag even harder to draw because more people will start to apply for the muzzleloader tag. There are some hunters that push their limits with rifles and try to take shots that are too far or beyond their capability, just because there is a buck standing on the hill side. Allowing a scope beyond 1x power would give some hunters a false sense of comfort and they will try to take shots beyond the muzzleloaders effective range or beyond the distance that the hunter has practiced at, at the range. In turn it could wound more deer. Yes 1x scope is not a popular one, but companies do make them. I did some looking and have found 4 different brands of 1x power muzzleloader scopes for under \$200 on the internet. Leave the scopes off muzzleloaders and keep it as primitive as possible, that is what makes this tag, a fun and memorable experience.

---

## Rules Review Process

**Doug Hunhoff**

**Smithville MO**

**Position:** oppose

**Comment:**

I was born and raised in yankton sd, but due to life move to Missouri. But I have been coming back to hunt big game and small game forever. And most of that was Archery deer and antelope combo hunts. So thanks for screwing that up by making October 1st opening day for non residents on public land. Would have to say this current commission have no clue what they are doing.

---

**Cody Warren**

**Rapid City SD**

**Position:** oppose

**Comment:**

Hello Commissioners, I would like to Voice my opposition to the petition of increasing muzzleloader optics to more than 1X . The technology of muzzleloaders these days with a more powerful scope you might as well just make it another rifle tag. Muzzleloader license was made for primitive hunting and I oppose any sort of magnification sights. There is already a high demand for this license with increasing the magnification the demand will increase as well. I say leave the rule alone and people who want this tag should adjust their skills to make it a successful hunt. Thank you for your time

---

**David Frankenberry**

**Custer SD**

**Position:** support

**Comment:**

ALLOWING 1-4X SCOPES: I support the use of scopes up to 4x for the muzzleloading season. This will reduce the chances of less experienced hunters from wounding an animal. I would also like to see an additional short muzzleloading season just prior to the regular firearms season to allow those who hunt with a more primitive weapon a better chance of hunting deer before the modern rifle hunters kill them off. Pennsylvania has a split muzzleloading season which is a 7 day early season and a 30 day late season, before and after the regular rifle deer season. This works out best and is more fair.

---

**Mark Miller**

**Black Hawk SD**

**Position:** support

**Comment:**

I am in favor of the 1 to 6 power scope for muzzle loaders the season is late and I am getting older and my eyes do not like open sights any more

## Trapping Prohibitions (Trap Check Times)

**Kristina Luce**

**Artesian SD**

**Position:** support

**Comment:**

support

---

**Brittney Davis-Schacht**

**Artesian SD**

**Position:** support

**Comment:**

support

---

**Alexandria Triplett**

**Artesian SD**

**Position:** support

**Comment:**

support

---

**Leon Luce**

**Artesian SD**

**Position:** support

**Comment:**

I believe traps should be checked every day, for one reason if someone's pet or livestock do get caught in a leg hold trap it can be released especially with the rules of trapping in the public right of way which is another topic. And also if people can't check their traps because they have to many they shouldn't run that many. I was always taught to run trap lines every day not only for the suffering of the prey but the damage to the hide since that is the main reason people trap is for the income. Thanks Leon J Luce

---

**Dylan Beckman**

**Prairie City SD**

**Position:** oppose

**Comment:**

oppose

---

**Ashley Neuharth**

**Menno SD**

**Position:** oppose

**Comment:**

I strongly oppose this petition! Thank you!

---

**Denise Hickam**

**Timber Lake SD**

**Position:** oppose

**Comment:**

As a woman trapper with my husband, I oppose shortening trap times, we had about 100 traps and snares and although we tried very hard to check every day some days we were unable to do so, do to weather mostly but other factors did come into play. During heavy snow drifts even with a UTV, it sometimes took a couple days to complete checks.

---

**Philip Neuharth**

**Menno SD**

**Position:** oppose

**Comment:**

Please do not let anti trapping groups like this undermine our trapping traditions in South Dakota. It is obvious Nancy is not a trapper and their only intention is to slowly chip away at trapping here in this great state.

The check laws are written the way they are for reasons. Let me share an example of why this 24 hour check is not good.

If my 9 year old daughter and myself set a trap at 3 PM Sunday afternoon, then on Monday when my daughter gets out of school at 330 we proceed to go check her trap, now she is a criminal. Makes no sense at all.

Thank you for protecting our trapping heritage here in South Dakota, and not letting the anti's undermine our laws.

#secondcenturytrapper

---

**Linda Neuharth**

**Menno SD**

**Position:** oppose

**Comment:**

I oppose

---

**Nathan Torberson**

**Freeman SD**

**Position:** oppose

**Comment:**

Please do not change the trapping regulations per the letter that was submitted.

\*trapping check times  
\*identifying traps  
\*listing of properties to be trapped  
\*mandatory survey of non-target animals caught  
\*allowing bystanders to euthanize animals found in traps  
.etc..  
The rules are fine as is.

Thank you.

---

**Tyler Kari**

**Bison SD**

**Position:** oppose

**Comment:**

This measure is not reasonable nor practical. Furthermore, I implore both Nancy Hilding and select members of the commission to stop trying to impose further restrictions on South Dakota trappers.

---

**Allan Minear**

**Lewistown MT**

**Position:** oppose

**Comment:**

oppose

---

**Roy Dahlgren**

**Bark River MI**

**Position:** oppose

**Comment:**

I state hope trapping I've trapped north Dakota an south an there is know way a person can check all traps in 24 hours

---

**Angela Billings**

**Oakland MS**

**Position:** oppose

**Comment:**

The trap check law is poorly written and will be very hard to adhere to, as written.

---

**Don Brandner**

**Lake Preston SD**

**Position:** oppose

**Comment:**

oppose

---

**Steve Johnson**

**Pierre SD**

**Position:** oppose

**Comment:**

oppose

---

**Joe Tropea**

**Bridgeport NJ**

**Position:** oppose

**Comment:**

Not fair for the trappers and their familys

---

**Larry Baer**

**West Peoria IL**

**Position:** oppose

**Comment:**

I like South Dakota and vacation there and spend money there on trapping supplies. Thanks, Larry

---

**Mark Monti**

**Berthold ND**

**Position:** oppose

**Comment:**

oppose

---

**Sean Davis**

**Forsyth MT**

**Position:** oppose

**Comment:**

Anti trapping groups do not present scientific or logical reasons. Their reasons are based upon emotion. South Dakota has a lot to lose if they start going down this path. This year it is trapping, next year will be game bird hunting or fishing regulations they want to change.

---

**Larry Murphy**

**Merit TX**

**Position:** oppose

**Comment:**

Leave the Trapping Regulations alone. No need for change unless to amend the part where Non-Residents can't trap. I have been a professional trapper for 40+ years.

---

**Jeremy Laakso**

**Champion MI**

**Position:** oppose

**Comment:**

oppose

---

**Paul Zieroth**

**Saginaw MN**

**Position:** oppose

**Comment:**

oppose

---

**Kathy Monti**

**Berthold ND**

**Position:** oppose

**Comment:**

oppose

---

**James Selgeby**

**Revillo SD**

**Position:** oppose

**Comment:**

The regulations as currently written adequately protect the interests of all South Dakotans along with the wildlife resources. The proposed changes are only for the purpose of restricting or harassing trappers.

---

**Clifford Fowler**

**Mexico MO**

**Position:** oppose

**Comment:**

oppose

---

**Eugene Drinkman**

**Gordon WI**

**Position:** oppose

**Comment:**

oppose

---

**Harold Dorsett**

**Efland NC**

**Position:** oppose

**Comment:**

Unnecessary complications and ambiguous regulations

---

**Michael Lippold**

**Maysville MO**

**Position:** oppose

**Comment:**

oppose

---

**Merris Miller**

**Lennox SD**

**Position:** oppose

**Comment:**

oppose

---

**Adrian Laurendeau**

**Mitchell SD**

**Position:** oppose

**Comment:**

The current laws in place WORK and have for years. There is no need to change them and complicate things.

---

**Daniel Engebretson**

**Sioux Falls SD**

**Position:** oppose

**Comment:**

oppose

---

**Kevin Firari**

**Juneau WI**

**Position:** oppose

**Comment:**

oppose

---

**Scott Willman**

**Three Lakes WI**

**Position:** oppose

**Comment:**

oppose

---

**Dan Turbak**

**Revillo SD**

**Position:** oppose

**Comment:**

Anti hunters and anti trappers are constantly trying to make it harder for people that enjoy the outdoors to do so. I would like to see hunting, trapping, and fishing rights added to the state constitution so that these outdoor activities dont get regulated to death.

---

**Colt Abel**

**Waubay SD**

**Position:** oppose

**Comment:**

oppose

---

**Jerry Herbst**

**Pukwana SD**

**Position:** oppose

**Comment:**

You want to reduce varmints and now you want to make it harder with useless rules that take the efficiency out of the process. Time to get them anti-trapping idiots off of the commission. Last year it was snares on all public lands (may places where pheasants did not even live) with the bird numbers hurting the "plan" was to reduce predator control and not shorten the bird season by 1 day.

---

**James Cox**

**Brady MT**

**Position:** oppose

**Comment:**

oppose

---

**Kyle Couchey**

**Mina SD**

**Position:** oppose

**Comment:**

Please do not change our trapping regulations. They are fine the way they are with no scientific reason, or recorded public safety reason to change.

---

**Kevin Nordby**

**Laurel NE**

**Position:** oppose

**Comment:**

oppose

---

**Dale Simpson**

**Saint Lawrence SD**

**Position:** oppose

**Comment:**

I trap coyotes each fall and have for years. A 24 check will eliminate that. They are to much creatures of habit for a 24 hour check. Please do not do this, I enjoy it and will have to stop.

Dale Simpson  
St Lawrence, SD 57373

---

**Eric Wieland**

**Lemmon ID**

**Position:** oppose

**Comment:**

As a SD sportsmen I am opposed to any changes in the current trapping regulations.

---

**Kevin Stake**

**Baileyville IL**

**Position:** oppose

**Comment:**

oppose

---

**Dale Halling**

**Bryant SD**

**Position:** oppose

**Comment:**

oppose

---

**Kyle Krebs**

**Gladstone ND**

**Position:** oppose

**Comment:**

oppose

---

**Brian Gundvaldson**

**Egan SD**

**Position:** oppose

**Comment:**

oppose

---

**James Barnett**

**Sioux Falls SD**

**Position:** other

**Comment:**

I agree that checking traps holding wild/live animals is very important to ensure humane treatment. I might humbly suggest that an exception be made on the amount of time if utilizing the killer or connibear traps as the animal is quickly dispatched by the trap itself. Thank you for your consideration.

---

**Bert Whitley**

**Lexington IN**

**Position:** oppose

**Comment:**

oppose

---

**Jacob Whitley**

**Lexington IN**

**Position:** oppose

**Comment:**

oppose

---

**Jim Firmin**  
**Fairbanks AK**  
**Position:** oppose

**Comment:**

oppose

---

**Dusty Luedtke**  
**Houston MN**  
**Position:** oppose

**Comment:**

oppose

---

**Dusty Luedtke**  
**Houston MN**  
**Position:** oppose

**Comment:**

oppose

---

**Dusty Luedtke**  
**Houston MN**  
**Position:** oppose

**Comment:**

oppose

---

**Jerry Orloski**  
**Mountain Top PA**  
**Position:** oppose

**Comment:**

oppose

---

**Bob` Simpson**

**Huron SD**

**Position:** oppose

**Comment:**

This is not practical in SD. Ask your state trappers if they can operate under such restrictions. I have trapped for 40 years and our check law is not broken - do not change it. This would put an end to many of us trapping in a time when pheasant numbers are already declining. Thank you

---

**Wayne Opatz**

**Soixfalls SD**

**Position:** oppose

**Comment:**

Don't need the new laws. Existing laws aren't abused. Enough laws on the books

---

**Kevin Thibodeau**

**Onida SD**

**Position:** oppose

**Comment:**

oppose

---

**Paul Kuhlman**

**Avon SD**

**Position:** oppose

**Comment:**

I strongly urge you to oppose all measures in this petition. Current trapping regulations are working excellent for our state. These efforts are the beginning of small steps to limit the opportunities of our citizens to participate in the great outdoors that are available in our great state. Please do not let measures like this petition succeed or we will be well on our way to become like states such as California, that are destroying our great heritage of trapping.

---

**Gary Myers. Sr**

**Klamath Falls OR**

**Position:** oppose

**Comment:**

oppose

---

**Ryan Jurgess**

**Brown City MI**

**Position:** oppose

**Comment:**

oppose

---

**Jon Betten**

**Redfield SD**

**Position:** oppose

**Comment:**

If anything allow east river a 3 day check also....

---

**Jon Betten**

**Redfield SD**

**Position:** oppose

**Comment:**

If anything allow east river a 3 day check also....

---

**Dan Christiansen**

**Hartford SD**

**Position:** oppose

**Comment:**

oppose

---

**Melvin Utter**

**Bison SD**

**Position:** oppose

**Comment:**

oppose

---

**Brandon Penzkover**

**La Crosse WI**

**Position:** oppose

**Comment:**

oppose

---

**Zac Thompson**

**Lemmon SD**

**Position:** oppose

**Comment:**

This would negatively impact the predator control program across the state, and make it cost prohibitive for trappers.

---

**Jake Middlebrooks**

**Elizabeth AR**

**Position:** oppose

**Comment:**

I oppose changing trap check times in south Dakota. The current trap check times are sufficient and allow fur harvesters to run a more effect trap line for coyote and predator control.

---

**Eric Kindsfater**

**Enola AR**

**Position:** oppose

**Comment:**

My family has owned farm land outside of Belle Fourche for multiple generations. We raise beef and sheep. We've also leased other farms and ranches over the years both east and north of Belle Fourche. I oppose the proposed rule changes to the existing language of SDGFP Regulation 41:08:02:03. I trapped in SD for many years for predator and nest predator control, and have even purchased NR trapping license as recently as a couple years ago. Changing the trap check laws to every 24 hours and adding administrative 'clerical' duties of weather record keeping are onerous and unnecessary. Should this rule change be allowed, trappers will be much less likely to take predators as efficiently and effectively as they can currently. This proposed change is not in-keeping with the significant resources SD has invested in decreasing nest predator populations. Why would SDGFP move backwards and hamstring trappers with inefficient trap check times? Which special interest group is proposing this?

---

**Dennis Wendel**

**Bryant IN**

**Position:** oppose

**Comment:**

oppose

---

**Danielle Rhine**

**Philip SD**

**Position:** oppose

**Comment:**

oppose

---

**Haren Mobly**

**Sioux Falls SD**

**Position:** oppose

**Comment:**

Instead of reducing the trapcheck time, GFP should consider extending it! Please do not cave to the anti-hunters, South Dakota sportsmen and women deserve better. Once again, please reject this proposal.

---

**Justin Rhine**

**Lander WY**

**Position:** oppose

**Comment:**

oppose

---

**Edward Schneider**

**Burlingame KS**

**Position:** oppose

**Comment:**

As a out of state trapper, I have experienced times where predator populations are very low. During these times having a lower check requirement can be costly in the terms of gasoline and cause shy predators to become more wary.

Predator population control is best served by the trapper using good management practices. It is not in the trappers interest to have predators waiting for days in a trap. However, Populations dictate how often ot is feasible. I myself prefer a 72 hour check when we experience a low population. During periods of many animals, I will voluntarily check my sets much quicker. Daily checks have a major impact on predator catch rate. These animals do not like human pressure and will move temporarily resulting in lower success by the trapper and more need in government paid trappers and gunners where the animal is left dead. I feel this is poor use of a animal's life.

I sincerely hope this comment helps.

I truly enjoy my time in your state each year.

Sincerely,  
Ed Schneider

---

**Tara Darby**

**Rapid City SD**

**Position:** oppose

**Comment:**

oppose

---

**Todd Chamley**

**Trent SD**

**Position:** oppose

**Comment:**

These anti trapping,hunting, fishing groups are always looking to take away privileges that we sportsman have. They will never stop their assault on our rights, because we have shown in the past that if they complain enough we give in to their wishes. How has that worked out so far for us? Not well I'd say, because next session their is always another "cause" they are pushing for. The only thing they want is NO HARVESTING of our natural resources, that is their end game. Doubt that, just look to the west and their more "progressive" states, give them an inch and they will be back for a mile! Our state is full of wonderful sportsmen and women, why are we always looking to penalize or change things that have worked successfully for decades?

---

**Jeff Beemer**

**Searsport ME**

**Position:** oppose

**Comment:**

I support sound wildlife management practices in every state. Such efforts are achieved through reasonable, well-thought-out policies that do not obstruct or diminish needlessly the legal activities of trappers and hunters whose work is vital to managing wildlife throughout the United States. Nancy Hilding's proposals would frustrate and reduce South Dakota's wildlife management effectiveness through administrative excess and inefficiencies. Ms. Hilding's proposals would have no direct – positive – impact on wildlife populations, and only increase bureaucratic/legal burdens at the expense of healthy game and non-game populations. The petition that Ms. Hilding has proposed is not a set of measures designed to advance sound wildlife management and should be rejected. Thank you.

---

**Steven Teske**

**Fort Dodge IA**

**Position:** oppose

**Comment:**

oppose

---

**Billy Perry**

**Manistique MI**

**Position:** oppose

**Comment:**

oppose

---

**Jake Stall**

**Elkhart IA**

**Position:** oppose

**Comment:**

I lived in South Dakota for a number of years and trapped while I lived there. Due to the distances involved the current check time requirements helped a lot, especially if I had unexpected problems arise in other areas of my life there as was common with work and school.

---

**Mark Steck**

**Lennox SD**

**Position:** oppose

**Comment:**

Dear Commissioners,

Once again trappers are under siege by the small but persistent Antitrapping group here in South Dakota. The goal and strategy for many years, by anti-groups across the country is to chip away at rules and statutes until it is nearly impossible for us to trap and hunt. They have succeeded in a handful of states. It's an incremental approach.

I do coyote control for west river ranchers during the fall and winter. I also trap their skunks, porcupines, and raccoons. I make wages without charging them a dime. Reducing my check times would greatly increase my cost per animal. Hence, I would need to charge for my services or not trap their land.

This is the second assault upon trapping in the last 2-3 years. I feel like I'm living on the west coast. Incidentally when foothold trapping I use traps that are quite foot friendly. Never once have I had a coyote or other animal expire in my traps. I can choose to kill the animal almost instantly or keep them alive and healthy until I dispatch them myself. When snaring my critters are dead within minutes.

Mark Steck

Lennox, SD

---

**Darren Nutt**

**Curtis NE**

**Position:** oppose

**Comment:**

oppose

---

**Chris Flann**

**Pingree ND**

**Position:** oppose

**Comment:**

This whole petition is a waste of time. Every one of the measures suggested are simply a way of making a practice that the petitioners dislike harder for the average person to do. They have no practical use in wildlife management and the harvest of furbearers. SDGFP is doing a wonderful job of managing resources and the trapping community is doing a wonderful job of practicing responsible stewardship. This is simply a move to slowly abolish trapping.

---

**John Roscoe**

**Brookings SD**

**Position:** oppose

**Comment:**

oppose

---

**Katie Buss**

**Mitchell SD**

**Position:** oppose

**Comment:**

These laws need to remain unchanged. They have worked for years and will continue to work!!

---

**Scott Nibe**

**Story City IA**

**Position:** oppose

**Comment:**

oppose

---

**Cody Grewing**

**Rapid City SD**

**Position:** oppose

**Comment:**

oppose

---

**Mark Smedsrud**

**Hartford SD**

**Position:** oppose

**Comment:**

I am firmly opposed to changing the trap check times from what they currently are. I am a retired Conservation Officer supervisor and have trapped for over 40 years. The rules we have in place now are fair, workable and humane. A 24 hour check law will eliminate many trappers from trapping in South Dakota. Most trappers trap around a work schedule or school schedule or both. I may check my traps at 8 AM on Saturday but not until 12 PM or later on a subsequent day. It would be illegal. Sometimes inclement weather dictates when I check my traps and a short check time is not reasonable. I know from my work history that the Audubon Society is anti-trapping (and anti-hunting) and their ultimate goal is to outlaw trapping. Enacting burdensome, unworkable regulations will help them achieve their goal. No consumptive use of wildlife is perfect. Hunters cripple deer and game birds with firearms and archery equipment. Fishermen release fish that eventually die due to hooking mortality. Trapping plays a valuable role in managing furbearers and predators. The trap check rules that are currently in place are reasonable and balance animal welfare and the trappers ability to participate in the sport. It has been working well for many years. Thank you, Mark Smedsrud.

---

**Travis Hymans**

**Lake Norden SD**

**Position:** oppose

**Comment:**

A 24 hr check makes the person have to check earlier and earlier every day to stay inside the law. If you leave at the same time and have to stop. The rest of the trapline will be over the 24 hr check

---

**Douglas Sullivan**

**Portland ME**

**Position:** oppose

**Comment:**

oppose

---

**Donald Stiffler**

**Stahlstown PA**

**Position:** oppose

**Comment:**

oppose

---

**Ensel Metz**

**Fort Wayne IN**

**Position:** other

**Comment:**

other

---

**Steve Wickman**

**Hillsdale WI**

**Position:** oppose

**Comment:**

oppose

---

**Scott Young**

**Mankato KS**

**Position:** oppose

**Comment:**

oppose

---

**Greg Reininga**

**Sioux Falls SD**

**Position:** oppose

**Comment:**

oppose

---

**Michael Hanson**

**Shoreham VT**

**Position:** oppose

**Comment:**

These regulations are completely unneeded and will cause outdoorsmen to not move to your state or spend their travel money there.

---

**Scott Person**

**Monroe SD**

**Position:** oppose

**Comment:**

oppose

---

**Mitch Johnson**

**Crofton NE**

**Position:** oppose

**Comment:**

As a trapper in a bordering state, I hate to see trapping in SD restricted more. While I am not opposed to the trap tag portion, the other portions would hinder trappers in several ways. Trapping is under fire in many states. I hate to see SD being one of them.

---

**Dusty Luedtke**

**Houston MN**

**Position:** oppose

**Comment:**

oppose

---

**Richard Johnson**

**Greene IA**

**Position:** oppose

**Comment:**

oppose

---

**Justin Bartling**

**Gregory SD**

**Position:** oppose

**Comment:**

I want to start off by saying I am concerned with SDGFP considering this as an option in our state. This proposal was brought forward by a known ANTI TRAPPING/HUNTING organization and they should have no part in making laws for sportsman to follow.

I myself work full time year round and trap year round for pheasant, deer and cattle operations in the spring and summer and then trap all winter for fur as well. It takes me 9 hours to run my 156 mile long line. I will be unable to trap if you go forward with a 24hour or even 48hour trap check law. It will effectively end trapping for any serious Trappers in South Dakota and that is the over all goal of this proposal.

---

**Travis Sargent**

**Burke SD**

**Position:** oppose

**Comment:**

A 24/hr check limit is not reasonable or feasible in our terrain and areas. The current system works perfectly fine and we do not need added restrictions

---

**Scott McElravy**

**South Paris ME**

**Position:** oppose

**Comment:**

It would be wise to allow the fish and game professionals manage the wildlife. The suggested rule changes are simply a political position by those that make money attempting to stop hunting, fishing and trapping.

---

**George Barger**

**Urbana OH**

**Position:** oppose

**Comment:**

oppose

---

**Ethan Cassidy**

**Fostoria OH**

**Position:** oppose

**Comment:**

oppose

---

**James Rezac**

**Lennox SD**

**Position:** oppose

**Comment:**

The author of this letter has no idea what trapping is about or why we do it. Allowing people to tamper with a trappers property and animals in them is a totally irresponsible idea and you know it cannot be allowed . Jim Rezac

---

**James Rezac**

**Lennox SD**

**Position:** oppose

**Comment:**

The author of this letter has no idea what trapping is about or why we do it. Allowing people to tamper with a trappers property and animals in them is a totally irresponsible idea and you know it cannot be allowed . Jim Rezac

---

**Lance Wilke**

**Mellette SD**

**Position:** oppose

**Comment:**

oppose

---

**Lance Wilke**

**Mellette SD**

**Position:** oppose

**Comment:**

oppose

---

**April Solheim**

**Mellette SD**

**Position:** oppose

**Comment:**

oppose

---

**Alicyn Sandquist**

**Mellette SD**

**Position:** oppose

**Comment:**

oppose

---

**Cole Sandquist**

**Mellette SD**

**Position:** oppose

**Comment:**

oppose

---

**Clay Solheim**

**Mellette SD**

**Position:** oppose

**Comment:**

oppose

---

**Traci Harford**

**Redfield SD**

**Position:** oppose

**Comment:**

oppose

---

**Savannah Harford**

**Redfield SD**

**Position:** oppose

**Comment:**

oppose

---

**Ralph Jeschke**

**Mellette SD**

**Position:** oppose

**Comment:**

oppose

---

**James Halverson**

**Rapid City SD**

**Position:** oppose

**Comment:**

1. The current trapping guidelines in place have been effective, efficient, and a workable compromise between various parties and groups since they were put in place.

2. The proposed changes are not effective, or efficient and place undo burden on both trappers and agency personnel who would be responsible for the additional requirements proposed by this petition.

The South Dakota Stockgrowers and the SDSGA Wildlife Management committee oppose this petition.

---

**Dan Krogman**

**White River SD**

**Position:** oppose

**Comment:**

As a rancher in mellette county with a 24 hour check I could hardly get traps checked on my own ground, let alone the other ranches I trap free of charge. Coyotes in ranching country need controlled. Thousands of dollars are spent in that endeavor. A 24 hour check would cut my ability to keep coyotes in check by 2/3rds This is not a good idea and all tax paying ranchers would feel the same

---

**John Couchey**

**Ipswich SD**

**Position:** oppose

**Comment:**

Please do not change the rules. There is no problem that needs to be fixed. Trap check times are suffice and humane the way they are.

---

**Jason Vollmer**

**Montrose SD**

**Position:** oppose

**Comment:**

Trapping rules need to be relaxed not more restrictive.

For too long trappers have lost privileges too anti wildlife management people.

---

**Dean Bartz**

**Kesley IA**

**Position:** oppose

**Comment:**

oppose

---

**Nadine Wilke**

**Ringo NJ**

**Position:** oppose

**Comment:**

oppose

---

**Joseph Wilke**

**Ringo NJ**

**Position:** oppose

**Comment:**

oppose

---

**Joseph Wilke**

**Trenton NJ**

**Position:** oppose

**Comment:**

oppose

---

**Michael Evans**

**Jacksonville IL**

**Position:** oppose

**Comment:**

Reducing trap check times to 24 hours from 48 would reduce the effectiveness of trapping as the excellent wildlife management tool that it is.

---

**Tom Miranda**

**Englewood FL**

**Position:** oppose

**Comment:**

Due to the huge size of the state and lack of private trappers -due to fur value- current trap check laws should remain the same. Thank You

---

**Sean Eaton**

**Mellette SD**

**Position:** oppose

**Comment:**

In an area like this where we provide for our family by means of Trapping we vehemently oppose any changes under the new laws suggested.

---

**Lisa Dandria**

**Flemington NJ**

**Position:** oppose

**Comment:**

oppose

---

**Lisa Dandria**

**Flemington NJ**

**Position:** oppose

**Comment:**

oppose

---

**David Kendall**

**Flemington NJ**

**Position:** oppose

**Comment:**

oppose

---

**Nicole Dandria**

**Flemington NJ**

**Position:** oppose

**Comment:**

oppose

---

**Kevin Anderson**

**Wisc. Rapids WI**

**Position:** oppose

**Comment:**

oppose

---

**Riley Nichols**

**Redfield SD**

**Position:** oppose

**Comment:**

oppose

---

**Jack Kirkebak**

**Alcester SD**

**Position:** oppose

**Comment:**

Trapping is necessary,a two day check is not to long

---

**Trenton Sonsalla**

**Lemmon SD**

**Position:** oppose

**Comment:**

Please leave it the way it is currently.

---

**Spencer Lynch**

**St. James MO**

**Position:** oppose

**Comment:**

oppose

---

**Brad Roghair**

**Okaton SD**

**Position:** oppose

**Comment:**

oppose

---

**Michael Webb**

**Eldorado AR**

**Position:** oppose

**Comment:**

oppose

---

**Tom Miklos**

**Custer SD**

**Position:** oppose

**Comment:**

oppose

---

**Amy Miklos**

**Custer SD**

**Position:** oppose

**Comment:**

If people think it's cruel to leave animals in traps for over 24 hours they should witness a coyote eating a newborn calf alive!

---

**Rachel Miklos**

**Custer SD**

**Position:** oppose

**Comment:**

With school and sports schedules we don't always have time to check traps every day

---

**Remington Miklos**

**Custer SD**

**Position:** oppose

**Comment:**

I don't always have time to check traps after school every day

---

**Suzanne Weber**

**Edgemont SD**

**Position:** support

**Comment:**

No comment text provided.

---

**Susan Braunstein**

**Rapid City SD**

**Position:** support

**Comment:**

Please change the law so traps are checked every 24 hours. It is the humane thing to do. Thank you.

---

**Charlotte Petrick**

**Rapid City SD**

**Position:** support

**Comment:**

Thank you. Dying of dehydration, languishing in a trap, is beyond cruel & inhumane. I've hunted for over 50 years and always take shots that I know will end in a quick death. South Dakota needs these new laws!

---

**Peggy Mann**

**Aberdeen SD**

**Position:** support

**Comment:**

I support of SDGFP's proposal because requiring traps to be checked at least once every 24 hours will reduce animal suffering and protect unintended victims. Ultimately I would like trapping banned.

---

**Theresa Giannavola**

**Aberdeen SD**

**Position:** support

**Comment:**

I would prefer you ban trapping COMPLETELY like many other states as it is cruel and barbaric but since that is not a consideration at this time I would ask that you change the trap check time to 24-hours, with no exceptions. Two to three days is FAR too long for an animal to suffer in a trap!

---

**Peggy Mann**

**Aberdeen SD**

**Position:** support

**Comment:**

I support of SDGFP's proposal because requiring traps to be checked at least once every 24 hours will reduce animal suffering and protect unintended victims. Ultimately I would like trapping banned.

---

**Dianna Torson**

**Brookings SD**

**Position:** support

**Comment:**

Ethical trappers check their traps every day!!!  
This needless suffering by our indigenous animals needs to stop. Thank you.

---

**Paulette Kirby**

**Rapid City SD**

**Position:** other

**Comment:**

Support 24 hour mandatory check of traps.

---

**Julie Berry**

**Vermillion SD**

**Position:** other

**Comment:**

I think it appalling that we even allow trapping, but it is horrifying that they are not required to be checked daily. And I feel there should be NO exceptions for weather or illness

---

**Shana Huls**

**Lennox SD**

**Position:** support

**Comment:**

Traps are cruel, and especially cruel if left unchecked. Domestic animals have also been caught in our area.

---

**Kerma Cox**

**Custer SD**

**Position:** support

**Comment:**

Although I wish traps were illegal, at the very least people should be required to check their traps at least every 24 hours. These types of traps are very cruel and create much unnecessary suffering, along with the aspect of catching unintended animals. (Think dog, cat, endangered, protected animals).

---

**Kim Ferrel**

**Black Hawk SD**

**Position:** support

**Comment:**

Trapping is inhumane. The least we can do is check them at least every 24 hours.

---

**Courtney Huse Wika**

**Spearfish SD**

**Position:** support

**Comment:**

No comment text provided.

---

**Jeannette Thomas Vance**

**Aberdeen SD**

**Position:** support

**Comment:**

No comment text provided.

---

**Janet Sargent**

**Rapid City SD**

**Position:** oppose

**Comment:**

Please! There should be a requirement to check traps at Least every 24hrs.

---

**Dee Anne Krebs**

**Rapid City SD**

**Position:** support

**Comment:**

No comment text provided.

---

**Vicki Peterson**

**Watertown SD**

**Position:** support

**Comment:**

Any time in a trap is too long. They need to be checked EVERY DAY. I am against trapping as it is but don't let the animals suffer longer than necessary. My sisters cat was in one.

---

**Rachael Gilbertson**

**Aberdeen SD**

**Position:** oppose

**Comment:**

Any responsible hunter knows it is best to have a clean and quick kill with as little waste as possible. How is letting an animal suffer for 3 days (if the correct animal is even trapped) responsible? There was not enough research conducted on this initiative nor are sufficient checks and balances in place.

---

**Lisa Moore**

**Rapid City SD**

**Position:** support

**Comment:**

Since we are a humane society we can surely show that same humanity to living creatures and not allow them to suffer needlessly simply because "there isn't time to check the trap". If that's the case then don't trap at all. Check the traps every 24hours as what true outdoorsman do.

---

**Teena O'toole**

**Rapid City SD**

**Position:** support

**Comment:**

I think 24 hours is the maximum length a trap should be unattended. I also disagree with open hunting during the spring for small critters when they're having their offspring!

---

**Cecilia Banner**

**Longmont CO**

**Position:** other

**Comment:**

It is an immorality that these traps are still used at all. Because trappers and others do not concede that animals are sentient, does not make it any less so. Appeals to those with the authority to decide will not likely be accepting of what they will consider an emotional request, nonetheless the suffering of animals is a legitimate basis to consider seriously. This cruelty is on you.

---

**Tara Beady**

**Sioux Falls SD**

**Position:** other

**Comment:**

Our state can do better. If you are going to push trapping do it in the most humane way possible. 24 hours is still too much time for these innocent animals to suffer but it's far better than 2 or 3 days. Please institute the 24 hr rule or stop pushing trapping all together.

---

**Melinda Bergeron**

**Greenbush MN**

**Position:** support

**Comment:**

No comment text provided.

---

**Anne Fuehrer**

**Sioux Falls SD**

**Position:** support

**Comment:**

No comment text provided.

---

**Tammy Jungen**

**Watertown SD**

**Position:** support

**Comment:**

It's inhumane to not have the traps checked daily. Please require the 24 hour trap check.

---

**Molly O'connor**

**Sioux Falls SD**

**Position:** support

**Comment:**

This is a no-brainer. Only a monster would support trapping these animals for over 24 hours unchecked. For the love of God, have some humanity.

---

**Ginny Dejager**

**Rapid City SD**

**Position:** support

**Comment:**

Trapping these animals is one of the most stupid things I have ever heard of. That being said I do think the traps need to be checked every 24 hours and actually done away with. What are we teaching our kids, earn money by killing animals that are good. Just plain stupid.

---

**Margaret Sohn**

**Gainesville FL**

**Position:** support

**Comment:**

All traps obviously should be checked at least once a day.

---

**Laural Bidwell**

**Rapid City SD**

**Position:** support

**Comment:**

While I realize that there is no way to enforce this since there are already not enough GFP staff to enforce any of the trapping rules, I do believe we have a responsibility to hunt and trap as humanely as possible. Leaving any animal in a trap for 2-3 days is inhumane and lazy. If the traps can't be checked daily the individual has put out too many traps. What if the animal caught is not on the list of acceptable catch and kills? Like someone's cat or dog? There should be a chance for them to survive being trapped. But the main argument for me is humane. These are not unfeeling entities - they are living breathing animals with brains that are being starved, dehydrated and terrified for 3 days. That is too long.

---

**Suzanne Hodges**

**Sacramento CA**

**Position:** support

**Comment:**

No comment text provided.

---

**Chris Krohmer**

**Mitchell SD**

**Position:** support

**Comment:**

Oh please, require the checking of traps every 24 hours. Do allow it to go any longer is such a terrible mistreatment of animal and causes needless suffering.

---

**Sharon Rose**

**Rapid City SD**

**Position:** oppose

**Comment:**

I don't support leaving animals in traps to suffer for several days. That's incredibly inhumane.

---

**Emily Norman**

**Ft. Pierre SD**

**Position:** support

**Comment:**

No comment text provided.

---

**Val Dzwulski**

**Rapid City SD**

**Position:** support

**Comment:**

Trapping is already cruel and inhumane. Dehydration, fear, chewing their own limbs to get free, being attacked. No living being should have to endure that kind of pain, fear and cruelty. This horrific method also endangers other wildlife and pets. Death should be quick and humane always.

---

**Maggie Melanson**

**Rapid City SD**

**Position:** support

**Comment:**

No comment text provided.

---

**Stephanie Samavarchian**

**Rapid City SD**

**Position:** support

**Comment:**

Traps need to be checked every 24 hours to avoid needless suffering and mistakes such as domestic animals being trapped.

---

**Louise McGannon**

**Mitchell SD**

**Position:** other

**Comment:**

I support no trapping, it is cruel! Very cruel, but if I am not able to persuade you to no trapping the least you can do is to make people check them every 24 hours. But my question is how do you make people do anything. You can have a law, but it is very hard to enforce it.

No animal deserves to be caught in a live trap or one of the other kind. They are living their lives as nature intended and man decides they shouldn't get to.

---

**Daniel Turbak**

**Revillo SD**

**Position:** oppose

**Comment:**

I would like to see the laws left alone. Anti groups are clearly trying to make it difficult for people to trap and stay within the laws. Weather is unpredictable and would result in trappers not being able to meet the 24 hour check requirement. When anti groups get rid of trapping they will come after hunting. We should be pushing to get hunting and trapping into the state constitution instead of trying to take away these lifestyles.

---

**David Skeide**

**Webster SD**

**Position:** oppose

**Comment:**

We have had no problem with the current regulations in the past and we should leave them alone . Thank you Dave S. Webster sad.

---

**Jennifer Mcfarland**

**Apache Junction AZ**

**Position:** support

**Comment:**

No comment text provided.

---

**Tracie Allen**

**Texarkana SD**

**Position:** oppose

**Comment:**

Traps are inhuman, period. Live traps included. I cannot believe we are still in the dark ages in the atrocious care of any living animal. Many times they are not checked for 2 to 3 days, OR MORE, causing the animal to starve, no water, in the open to all nature's elements, dying a horrible death more times than not. And what of their babies, starving, or eaten by other prey without their mothers. WOW, really humans still do this? How would you like to be put in the same situation. Honestly, would you, NO. These animals feel and hurt just as we do, please think about that. THEY HURT TO!!!! Please have some passion and stop this, PLEASE STOP.

---

**Caleb Ranschau**

**Canion SD**

**Position:** oppose

**Comment:**

I am against changing the regulations on changing trap check times. It seems like South Dakota is being drown with anti trap rules.

---

**Gwyneth Fastnacht**

**Wessington Springs SD**

**Position:** support

**Comment:**

Please require 24-hour trap checks to limit and prevent needless suffering for trapped animals. If our society is going to contour this trapping practice, we must at least step-up to be responsible to the animals and respectful of their lives. We must make the trap-check requirements more stringent and require much for frequent checks than currently required. I am in FAVOR of this proposal.

---

**Letha Lewandowski**

**Webster SD**

**Position:** support

**Comment:**

I believe the shortened time of 24 hours that a trapper would have in between checking traps is a good idea. It makes trapping slightly more humane.

---

**Jeanette Williams**

**Vermillion SD**

**Position:** other

**Comment:**

I realize you have no intention of listening to the public on this, but here's my view. I oppose trapping altogether, but if you are going to allow trapping the traps need to be checked every 24 hours.

---

**Clarence G. Lems**

**Canton SD**

**Position:** oppose

**Comment:**

I'm a life long South Dakota resident. I grew up on a sheep farm in SE South Dakota. I am a land owner/farmer/land manager, and I trap 3-4 months out of the year, once the crop is out. I've been trapping since I was 10 years old. Like farmers know how to take care of their livestock, Trappers know how to take care of the animals they catch and they manage their traplines based on the time they have and the weather conditions that exist. The Trappers in South Dakota have been working along side farmers and ranchers as well as the State damage control personnel for years under the current check laws. I don't see that there has been a problem. I'm disappointed that an Anti-trapping group with ties from outside our state have been given a platform for their agenda within our game commission. Thankfully, both at the National level and the state level there is a real effort to cut regulations, not develop new ones. I'm glad to see our Governor trying new approaches to promote trapping within our state. Trapping is a necessary tool to help control our predator species throughout our state while maintaining a healthy game population for all sportsman and wildlife enthusiasts that come to our state. If this new rule we're enacted it would be a setback for everyone involved in managing the wildlife in South Dakota. Leave it alone. Thanks for the opportunity to respond.

---

**Chad Mahler**

**Sutherland IA**

**Position:** oppose

**Comment:**

I am opposed to the constant chipping away at our trapping rights!

---

**Cristin Holm**

**Rapid City SD**

**Position:** oppose

**Comment:**

I do not in the slightest support this bounty program, I think it is totally cruel and inhumane and I definitely don't agree with only the traps every 3 days.

---

**Justin Krajewski**

**Spearfish SD**

**Position:** oppose

**Comment:**

Thank you for accepting my comments on the proposed trap check regulation. I am opposed to this proposal because it is unnecessary. This proposal would force almost all coyote trappers, including myself, to stop trapping and harvesting furbearers on our traplines. And that is exactly what the proposer and BornFreeUSA wish to do...is to ban all trapping and hunting as that group and others have pushed for in other states. Also I am disappointed that Audubon would pursue placing undue regulations on trappers since our work in harvesting predators help several species of birds throughout the state and region. Our neighboring states have similar trap check rules to South Dakota except Minnesota and Nebraska, which have varied check times depending on the specific species. Again, I oppose this proposal and appreciate the opportunity to comment to the SDGFP Commission.

---

**Dianna Torson**

**Brookings SD**

**Position:** support

**Comment:**

Any ethical trapper would check the traps every day. I hate trapping. Have had pets trapped. But if it has to be then traps must be checked every day. Leaving animals to starve is inhumane.

---

**Kris Hoffman**

**Lennox SD**

**Position:** oppose

**Comment:**

No comment text provided.

---

**Jerry Wilson**

**Vermillion SD**

**Position:** support

**Comment:**

As a young teenager, I trapped a few fur-bearing animals (what the governor likes to call "nest predators.") It didn't take me long to decide on my own that this was not acceptable behavior for me.

My father, who had also trapped as a boy, made it completely clear that ethics were involved. If I were going to trap, I had to check traps every morning before school, regardless of the weather.

I am deeply disturbed by the disrespect for native wildlife exhibited by the governor, and apparently by some in the GFP leadership. If the imported pheasant is important to the economy, then we need to stop farming from ditch to ditch, require filter strips, and restore habitat.

Teaching young people that killing native wildlife is "family fun" is wrong. The least we can do is to require basic ethical behavior by those who trap.

Jerry Wilson

---

**Lance Catron**

**Custer SD**

**Position:** oppose

**Comment:**

I oppose the 24 hour requirement for trap checking. I believe that it is unreasonable for a trap to be set at 8 AM and checked by 8 AM the next day for the common hobby recreational trapper with a family. Also with the advancement of offset trap jaws, multiple swivels and shock springs there is no damage to the critter by the trap. I believe the current trap check rules are sufficient and should not be changed. Respectfully submitted.

---

**Brian Watland**

**Custer SD**

**Position:** oppose

**Comment:**

The current trap check laws do not need to be changed. Most trappers are true sportsmen who do not want an animal to suffer. They often design their trap sets to humanely dispatch the animal quickly. South Dakota is geographically a very large state, and additional time may be needed to run a trap line. If possible, most trappers check their traps more frequently than the time limits set by the current law. Please do not change the current trap check regulations.

---

**Brian Watland**

**Custer SD**

**Position:** oppose

**Comment:**

The current trap check laws do not need to be changed. Most trappers are true sportsmen who do not want an animal to suffer. They often design their trap sets to humanely dispatch the animal quickly. South Dakota is geographically a very large state, and additional time may be needed to run a trap line. If possible, most trappers check their traps more frequently than the time limits set by the current law. Please do not change the current trap check regulations.

---

**Andrea Sreiber**

**Schenectady NY**

**Position:** other

**Comment:**

Dear IRRC legislator:

With this message I urge you to please reject the SDGFP Commission's rule change proposal to extend the use of "live traps" on public lands and right-of-ways!

Trapping is currently not allowed on public lands during the summer months so tourists have an opportunity to enjoy the land without the fear of encountering traps, for themselves, their children and their pets!

Please do not change this!

A few other reasons to reject the proposed change of rule:

- Mothers caught in live traps are kept from feeding dependent young - trappers are not just killing the mom, but also the litters of orphaned young they left at their nest to starve!
- Traps are only required to be checked every 3 days west of the Missouri River and every 2 days east of the Missouri River. Trapped animals suffer from pain, dehydration, starvation and exposure to the elements....
- SD has very lax trap check time regulations, non-target animals are being caught, languish in traps and can suffer a cruel death. Non-target animals include wildlife and domestic animals, like birds, protected species, cats, dogs, and other animals.

Please let's remain humane, and sharpen the law instead of extending cruel trapping!!

Thank you,

Sincerely,  
Andrea Sreiber

---

**Jake Peterson**

**Canton SD**

**Position:** oppose

**Comment:**

No comment text provided.

---

**Jay Lems**

**Canton SD**

**Position:** oppose

**Comment:**

No comment text provided.

---

**Andrea Hinrichs**

**Beresford SD**

**Position:** oppose

**Comment:**

My full income comes from the trapping industry (I work at Dakotaline Snare in Lennox). I am opposed to the trap check proposals. I am also very alarmed at what seems to be an antitrapping crusade being fostered by at least one commissioner.

---

**Hunter Kjose**

**Lennox SD**

**Position:** oppose

**Comment:**

I am against the proposal to change trap check times. It seems like South Dakota is becoming more and more anti trapping with some of these regulations. These changes are not needed.

---

**Larry Ymker**

**Akron IA**

**Position:** oppose

**Comment:**

My comments are that trappers do not need more controls and rules. This is another attempt to take over the trapping industry in South Dakota. I live East River where we already check traps every other day. More rules more chances for people to mess with our equipment. This rule would cause considerable problems for trappers. People would run a shorter line less predators would be killed more birds would be killed (pheasant and turkeys) more livestock depredation. More rules but less protection for people. People are in more danger from predators. I have a SD Drivers Licence with Iowa address down here in SE corner of the State of South Dakota.

---

**Robert Ambos**

**Bartlett IL**

**Position:** oppose

**Comment:**

No comment text provided.

---

**Kenneth Lindskov**

**Rapid City SD**

**Position:** oppose

**Comment:**

In a State where the Governor supports predator control in support of pheasant nesting, I can not believe the Commission could support a 24-hour check law that would severely limit trapping and predator control.

---

**Carter Fillaus**

**Avon SD**

**Position:** oppose

**Comment:**

I urge you to vote no on this petition. I am a youth trapper and feel that current regulation are just fine. Thanks for consider my comments

---

**Sandy Steck**

**Canion SD**

**Position:** oppose

**Comment:**

I have spent much time trapping with my husband. No one cares about the welfare of the animals more than him. The bunny huggers and city dwellers have no clue!

---

**Gage Bares**

**Avon SD**

**Position:** oppose

**Comment:**

I strongly urge you to vote no on this petition.between going g to school and working this new Law would greatly hinder my ability to trap.

---

**Darci Adams**

**Hartford SD**

**Position:** support

**Comment:**

August 28, 2019

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

Re: Support the proposal modifying rule 41:08:02:03 to require 24-hour trap checks

Dear Chair Jensen and members of the commission,

The Humane Society of the United States opposes the trapping and killing of animals for fur pelts and trophies because it causes needless and unjustifiable death and is, therefore, inconsistent with the aims of a humane society. With this in mind, on behalf of our South Dakota members and supporters we urge you to support the proposal modifying rule 41:08:02:03 to require trappers to check their traps once every 24 hours. This proposal offers a commonsense update to South Dakota's trapping rules. This change is 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.

#### Animals suffer because of lax trap check times

Target and non-target animals frequently sustain severe injuries from being trapped, ranging from claw loss and deep flesh cuts to broken bones and tooth fractures, among many others. The type and severity of injury varies with factors such as the type of trap, the species trapped, weather conditions, and duration of time in the trap. Requiring trap checks once every 24 hours will reduce animal suffering by limiting physical injuries to animals. Trapped animals also likely suffer from thirst, hunger, anxiety, fear, pain, and distress. Requiring trap checks every 24 hours has the potential to reduce some of this suffering as well.

#### Lax trap check times put unintended victims at risk

Traps are indiscriminate, often capturing "non-target" animals. Other wildlife, including threatened and endangered species, and pet dogs and cats are at risk of needless and unjustifiable suffering and death because of infrequent trap checks. These animals have a better chance of surviving with frequent trap checks.

#### Wildlife professionals support frequent trap check times

Requiring traps to be checked at least once every 24 hours is a reasonable proposal. The Association of Fish and Wildlife Agencies (AFWA) instructs new trappers in its trapper education manual that they must check traps daily. The American Society of Mammalogists, in its guide for using wild animals in research, states that some trap types should be checked twice daily or even more frequently, and that most traps should be checked at least once a day to minimize mortality or injury to animals. Most states require trap checks to occur daily or once every 24 hours in some trapping situations or for some trap types.

To the specific proposed changes, we suggest that 4 and 5 be modified to ensure that release is prioritized over euthanasia for animals that can be released. Euthanasia of trapped animals should be only a last resort. We also encourage you to require that animals that are injured in the course of a violation of this trap check requirement be transported to a licensed wildlife rehabilitation facility or veterinarian for treatment or for humane euthanasia if the best efforts to rehabilitate and release the animal fail.

For the foregoing reasons we request your support for the proposal modifying rule 41:08:02:03 to require trappers to check their traps once very 24 hours.

Sincerely,

Darci Adams  
Senior State Director, The Dakotas  
The Humane Society of the United States  
PO Box 733  
Hartford, SD 57033

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**Lisa Moore**

**Rapid City SD**

**Position:** support

**Comment:**

You can't argue with common sense - every 24 hours is very reasonable.

---

**Kandy Hastings**

**Rapid City SD**

**Position:** support

**Comment:**

To stop needless suffering and cruelty to all animals I support the gfp.sd proposal of trap checking every 24 hrs.

---

**Kasie Heiden**

**Vermillion SD**

**Position:** support

**Comment:**

As someone who lives in a rural location, I believe traps should be checked daily (at least every 24 hours) primarily to prevent pets from being caught for multiple days. It is not uncommon for people who live in the country to let their farm dogs and cats roam. When these pets are gone for longer than normal people begin to fear the worst - did they get swept away by the river, fall into something they can't get out, get hit by a vehicle and yes, are they stuck in a trap? Some of these we can't prevent but this is one that we can. Additionally, I would recommend that the fine incurred from not checking traps be rather significant. We shouldn't have to wait for a child to go missing for days and be stuck before we make this a requirement.

---

**Philip Neuharth**

**Menno SD**

**Position:** oppose

**Comment:**

No comment text provided.

---

**Cody Soukup**

**Avon SD**

**Position:** oppose

**Comment:**

I am 14 years old and enjoy trapping very much. I urge you to vote no on this petition.

---

**Anne Fuehrer**

**Sioux Falls SD**

**Position:** support

**Comment:**

Requiring traps to be checked at least once every 24 hours will reduce animal suffering and protect unintended victims.

---

**Mary Potter**

**Sioux Falls SD**

**Position:** support

**Comment:**

To start with, I am opposed to trapping. It is a cruel and inhumane practice. At the least, the traps should be checked daily! An animal trapped is suffering in so many ways, and a trapped female leaves her young ones in jeopardy without her protection. Please, support anything that curtails this practice. Thank you.

---

**Julie Anderson**

**Rapid City SD**

**Position:** support

**Comment:**

I support moving the trap check time to at least once every 24 hours. If trappers cannot minimize the time an animal has to endure the cruelty of a trap, it should be abolished. This is the bare minimum of comfort an animal who is facing death can be provided, and it is the duty of the GF&P to enforce this regulation. Extreme weather, loss of limb, mutilations and extreme pain are part of trapping and to not minimize the time an animal is subjected to these conditions is unacceptable.

---

**Patricia Stock**

**Olmsted Falls OH**

**Position:** support

**Comment:**

24 hour trap checks would cut down on more non select animals getting help. Cats, dogs, and other animals aren't targeted but are caught in these traps. If you want to trap than you should check your traps every 24 hours.

---

**Jessica Goldammer**

**Mitchell SD**

**Position:** support

**Comment:**

I support checking traps every 24 hours instead of 2-3 days.

---

**Tracie Allen**

**Bismarck SD**

**Position:** support

**Comment:**

I strongly support the checking of traps in a 24-hour period. The 2 and 3 day period is inhumane. These animals feel fear and pain, they also need to have water and food to sustain them like we do. Please, please have compassion, pass this bill for the 24-hour check. PLEASE!

---

**Cody Soukup**

**Avon SD**

**Position:** oppose

**Comment:**

I am 14 years old and enjoy trapping very much. I urge you to vote no on this petition.

---

**Rachel Welch**

**Sioux Falls SD**

**Position:** oppose

**Comment:**

Traps should be checked daily to reduce the amount of suffering not only in the animals intended to trap, but also those who are unintentionally trapped including stray or loose household pets.

---

**Lucille Howey**

**Hill City SD**

**Position:** oppose

**Comment:**

All responsible trappers should be willing to check their traps within 24 hours of putting them out.

---

**William Kurtenbach**

**Groton SD**

**Position:** oppose

**Comment:**

I have read the proposed changes to trapping regulations. I cannot believe the commission even accepted the proposal because the changes are so indescribably ridiculous, totally unenforceable, and most importantly, totally unwarranted. I have trapped for many years in SD and other states and I cannot believe the commission is considering something this bizarre in my home state of South Dakota. No changes are needed to the trapping regulations in South Dakota.

---

**Mark Wetmore**

**Vermillion SD**

**Position:** other

**Comment:**

I OPPOSE ANY TRAPPING ON PRINCIPAL; AND WITH THE TAIL BOUNTY THE STATE HAS GONE COMPLETELY TO THE DARK SIDE.  
BUT, LACKING PROHIBITION, I SUPPORT 24 HOUR CHECKS.

# Public Comments

## Other

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**Michael Whitehead**

**Scottsdale AZ**

**Position:** oppose

**Comment:**

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

---

**Robert Payne**

**Grove City PA**

**Position:** oppose

**Comment:**

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

---

**Amy Brown**

**Ellendale ND**

**Position:** oppose

**Comment:**

To Whom It May Concern,

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

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

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

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

Mountain lions regulate their own numbers and do not require intense management to limit their populations.

Hunting is a bad tool, killing the lions least likely to come into conflict with people, pets and livestock, and creating more space for young dispersing lions that are most likely to come into conflict. Research at the Washington State University Carnivore Conservation Laboratory found that heavy hunting of cougars actually increases conflicts between humans and cougars. These findings run contrary to presumptions of wildlife management programs designed to continually increase kill numbers. Non-lethal methods are more effective and last longer.

Killing female mountain lions results in the orphaning of their kittens. Hunting leaves kittens to die from starvation, dehydration, and exposure. Juvenile lions that haven't developed the skill set needed to hunt prey animals are more likely to target opportunistic prey such as domesticated livestock and pets.

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

Thank you for your time,  
Sincerely,

Amy Brown  
605-209-6902

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**Michael Waid**

**Yankton SD**

**Position:** other

**Comment:**

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

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

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

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

---

**Keith Bauman**

**Yankton SD**

**Position:** other

**Comment:**

I have written this before

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

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

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

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

---

**Dean Bobzean**

**Toledo OH**

**Position:** other

**Comment:**

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

---

**Eric Schoenfelder**

**Lake Andes SD**

**Position:** oppose

**Comment:**

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

---

**Eric Schoenfelder**

**Lake Andes SD**

**Position:** oppose

**Comment:**

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

---

**Anthony Filholm**

**Brookings SD**

**Position:** oppose

**Comment:**

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

---

**Louise Gray**

**Lompoc TX**

**Position:** oppose

**Comment:**

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

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

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

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

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

Sincerely,  
Mrs. Gray

---

**Larry Menning**

**Chamberlain SD**

**Position:** support

**Comment:**

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

---

**R Craig Oberle**

**Mellette SD**

**Position:** other

**Comment:**

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

---

**Nancy Hilding**

**Black Hawk, SD**

**Position:** other

**Comment:**

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

---

**Nancy Hilding**

**Black Hawk, SD**

**Position:** other

**Comment:**

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

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

PHAS's Commenting Guidance on Draft Revision:

The status quo allows for overly aggressive hunting of cougars both in the Black Hills and in the Prairie. We question SD GFP 2017-2018 estimates of the cougar population numbers in the Black Hills, as confidence intervals are too large (occasionally the SDGFP annual cougar population estimate, is not believable due to inadequate field data collected.)?

The intrinsic growth rate for mountain lion populations is established by researchers to be between 15-17%. For a ?stable mountain lion population, limiting human caused death to 12-14% of the adult/subadult population is recommended. This includes removing conflict lions, traffic deaths as well as hunting. PHAS supports management of the Black Hills area, as a "source" population to help recolonize eastern areas with cougars. To manage the overall area as a "source" population SDGFP needs "harvest objectives" below 12% of estimated adult/subadult population. The SD GFP plans to manage for population of 200-300 lions of all ages, which

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

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

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

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

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

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

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

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

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

---

**Nancy Hilding**

**Black Hawk SD**

**Position:** other

**Comment:**

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

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

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

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

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

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

Interactive maps with several layers:

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

maps shown each year only

<http://bit.ly/SDlionmap>

---

**Nancy Hilding**

**Black Hawk SD**

**Position:** other

**Comment:**

Nancy Hilding  
President  
Prairie Hills Audubon Society,

To SD Game, Fish & Parks Commission,

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

---

**Donna Watson**

**Deadwood SD**

**Position:** oppose

**Comment:**

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

---

**Nancy Hilding**

**Black Hawk SD**

**Position:** other

**Comment:**

Nancy Hilding to SD GFP

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

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

Ownership statewide acres % of statewide

total private land 36,875,256 78.7%

U.S. Forest Service

national grasslands (866,902)

national wildlife preserves (27,038)

national forests (1,125,318)

2,019,258

U.S. Army Corps of Engineers1 138,446

U.S. Bureau of Land Management 266,278

U.S. Fish and Wildlife Service

waterfowl production areas (148,142)

national wildlife refuges (46,713)

194,855

National Park Service2 248,217

U.S. Bureau of Reclamation3 34,185

Federal lands subtotal 2,901,239 6.2%

Tribal trust lands4 5,202,811 11.1%

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

SDGFP

game production areas and water access

areas (185,670)

Division of Parks and Recreation and

Custer State Park (99,952)

285,622

Other state lands 373,282

State lands subtotal 1,465,904 3.1%

water 428,105 0.9%

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

---

**Barbara Garakian**

**Rancho Mirage CA**

**Position:** oppose

**Comment:**

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

---

**Julie Anderson**

**Rapid City SD**

**Position:** oppose

**Comment:**

To: Rachel Comes

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

Thank You,

To: SDGFP Commissioners

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

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

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

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

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

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

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

Sincerely,

Julie Anderson  
845 Virginia Lane  
Rapid City, SD  
57701

---

**Susan Theilen**

**Chilliwack BC**

**Position:** support

**Comment:**

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

---

**Teah Homsey-Pray**

**Deadwood SD**

**Position:** oppose

**Comment:**

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

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

## Trapping Prohibitions (Trap Check Times)

**Dan Varns**

**Sioux Falls SD**

**Position:** support

**Comment:**

Make trapping more humane and protect unintended victims

---

**Barbara Thurman**

**Aberdeen SD**

**Position:** other

**Comment:**

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

---

**Lacey Jackson**

**Sioux Falls SD**

**Position:** other

**Comment:**

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

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

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

---

**Heidi Hanson**

**Sioux Falls SD**

**Position:** oppose

**Comment:**

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

---

**Emelie Haigh**

**Volga SD**

**Position:** support

**Comment:**

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

---

**Karen Conley**

**Box Elder SD**

**Position:** support

**Comment:**

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

---

**Angela Duvall**

**Spearfish SD**

**Position:** support

**Comment:**

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

---

**S.F. Lee**

**Belle Fourche SD**

**Position:** oppose

**Comment:**

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

---

**Cecilia Banner**

**Longmont CO**

**Position:** support

**Comment:**

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

---

**Jana Haecherl**

**Custer SD**

**Position:** oppose

**Comment:**

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

---

**Peggy Mann**

**Aberdeen SD**

**Position:** oppose

**Comment:**

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

---

**Mickie Hortness**

**Rapid City SD**

**Position:** support

**Comment:**

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

---

**Margaret McLaughlin**

**Sturgis SD**

**Position:** oppose

**Comment:**

inhumane on all levels

---

**Darren Johnson**

**Vermillion SD**

**Position:** support

**Comment:**

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

---

**Nancy Barondeau**

**Roscoe SD**

**Position:** other

**Comment:**

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

---

**Sandy Carlson**

**Columbus NE**

**Position:** oppose

**Comment:**

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

---

**Lisa Anderson**

**Aberdeen SD**

**Position:** support

**Comment:**

No comment text provided.

---

**Jerilyn Rich**

**Deadwood SD**

**Position:** support

**Comment:**

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

---

**Vicki Koebernick**

**Rapid City SD**

**Position:** support

**Comment:**

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

---

**Donna Dugger**

**Rapid City SD**

**Position:** support

**Comment:**

Check traps every 24 hours.

---

**Jolyn Harder**

**Hot Springs SD**

**Position:** support

**Comment:**

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

---

**Tacy Paul**

**Spearfish SD**

**Position:** support

**Comment:**

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

---

**Elaine Lanier**

**Murray NE**

**Position:** support

**Comment:**

Trapping is already a barbaric practice. There is no reason to cause such immense suffering for even 24 hours let alone longer.

Imagine having one of these devices on your own limbs for days. Or even worse, a small child that has wandered off.

---

**Bob Johnson**

**Philadelphia PA**

**Position:** support

**Comment:**

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

---

**Ray Hayes**

**Deadwood SD**

**Position:** support

**Comment:**

Ban trapping altogether. Just because it has always been done doesn't make it right

---

**Leah Kelly**

**Sioux Falls SD**

**Position:** support

**Comment:**

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

---

**Heather Allmendinger**

**Sioux Falls SD**

**Position:** support

**Comment:**

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

---

**Patty Ellsworth**

**Spencer IA**

**Position:** other

**Comment:**

I would like traps abolished or checked daily.

---

**Jamie Moore**

**Rapid City SD**

**Position:** other

**Comment:**

Absolutely need to check them every 24 hours!!

---

**Heather Schiller**

**Sioux Falls SD**

**Position:** support

**Comment:**

Need to be checked once every 24 hours!

---

**Gwyn Witte**

**Wess Springs SD**

**Position:** support

**Comment:**

I approve the 24 trap check rule proposal.

---

**Lisa Acheson**

**Chester SD**

**Position:** support

**Comment:**

No comment text provided.

---

**Lisa Acheson**

**Chester SD**

**Position:** support

**Comment:**

Duplicate

---

**Erin George**

**Rapid City SD**

**Position:** support

**Comment:**

No comment text provided.

---

**Karon Larson**

**Deadwood SD**

**Position:** support

**Comment:**

Please check traps every 24 hours

---

**Walter Weiss**

**Douglasville GA**

**Position:** support

**Comment:**

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

---

**Gerry Morgan**

**Tucson AZ**

**Position:** support

**Comment:**

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

---

**Jennifer Swilley**

**Hattiesburg MS**

**Position:** other

**Comment:**

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

---

**Lydia Waltj**

**Rapid City SD**

**Position:** support

**Comment:**

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

---

**Amy Miner**

**Yankton SD**

**Position:** support

**Comment:**

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

---

**Brittany Kimball**

**Brandon SD**

**Position:** support

**Comment:**

24 hrs mandatory checks

---

**Carolyn Behrens**

**Rapid City SD**

**Position:** support

**Comment:**

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

---

**Dawn Biesecker**

**Madison Township PA**

**Position:** support

**Comment:**

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

---

**Tina Startz**

**Deadwood SD**

**Position:** support

**Comment:**

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

---

**Volunteers Neill**

**Box Elder SD**

**Position:** oppose

**Comment:**

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

---

**Heather Moyer**

**Henderson MD**

**Position:** support

**Comment:**

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

---

**Ray Maize**

**Pierre SD**

**Position:** oppose

**Comment:**

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

---

**Sami Kratovil**

**Brookings SD**

**Position:** support

**Comment:**

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

---

**Sharon Tschetter**

**Hitchcock SD**

**Position:** support

**Comment:**

No comment text provided.

---

**Teresa Mccarty**

**Norfolk VA**

**Position:** oppose

**Comment:**

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

---

**Donna Reil**

**Rapid City SD**

**Position:** support

**Comment:**

Require 24 hour checks on traps !!!!

---

**Robert Reil**

**Rapid City SD**

**Position:** support

**Comment:**

Require 24 hour checks on traps !

---

**Elizabeth Koehler**

**Sioux Falls SD**

**Position:** support

**Comment:**

I approve the 24 hour trap check rule.

---

**Eric Schoenfelder**

**Lake Andes SD**

**Position:** oppose

**Comment:**

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

---

**Josh Bauman**

**Brookings SD**

**Position:** support

**Comment:**

Traps should be checked daily!

---

**Jo Kephart**

**Vermillion SD**

**Position:** support

**Comment:**

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

---

**Chris James**

**Egan SD**

**Position:** support

**Comment:**

I SUPPORT 24 hr trap check timelines.

---

**Susan Price**

**Levittown PA**

**Position:** support

**Comment:**

No longer than 24 hours and that is too long.

---

**Lucinda Schuft**

**Hot Springs SD**

**Position:** support

**Comment:**

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

---

**Jeanne Reif**

**Deadwood SD**

**Position:** support

**Comment:**

No comment text provided.

---

**Patricia Stock**

**Olmsted Falls OH**

**Position:** support

**Comment:**

To do otherwise is inhumane

---

**Shawna Gardner**

**Sioux Falls SD**

**Position:** support

**Comment:**

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

---

**Jaleana Dixon**

**Fairburn SD**

**Position:** support

**Comment:**

3 days is too long and inhumane!

---

**Gregory Palmer**

**Nemo SD**

**Position:** support

**Comment:**

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

---

**Mike Hanson**

**Sioux Falls SD**

**Position:** support

**Comment:**

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

---

**Stephany Fischer**

**Rapid City SD**

**Position:** support

**Comment:**

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

---

**Katrina Kellogg**

**Loveland CO**

**Position:** oppose

**Comment:**

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

---

**Ann Kinney**

**Minneapolis MN**

**Position:** oppose

**Comment:**

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

---

**Kira Leesch**

**Sioux Falls SD**

**Position:** oppose

**Comment:**

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

---

**Peggy Ellingson**

**Sioux Falls SD**

**Position:** support

**Comment:**

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

---

**Linda Greene**

**Sioux Falls SD**

**Position:** support

**Comment:**

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

---

**Bridget Vandeputte**

**Rosholt SD**

**Position:** support

**Comment:**

Trappers should be more invested and involved in their ventures!

---

**Jason Solano**

**Rapid City SD**

**Position:** support

**Comment:**

No comment text provided.

---

**Pamela Bacon**

**Lexington NC**

**Position:** oppose

**Comment:**

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

---

**Jennifer Reasoner**

**Brandon SD**

**Position:** other

**Comment:**

Please check daily. Please. Very inhumane. Suffering.

---

**Mary Solano**

**Rapid City SD**

**Position:** support

**Comment:**

No comment text provided.

---

**Joseph Solano**

**Rapid City SD**

**Position:** support

**Comment:**

No comment text provided.

---

**Ashley Mcneary**

**Aberdeen SD**

**Position:** support

**Comment:**

No comment text provided.

---

**Virginia Morse**

**Newell SD**

**Position:** support

**Comment:**

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

---

**Suzanne Hodges**

**Sacramento CA**

**Position:** support

**Comment:**

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

---

**Terri Minnick**

**Palos Park IL**

**Position:** oppose

**Comment:**

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

---

**Stardust Red Bow**

**Rapid City SD**

**Position:** support

**Comment:**

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

---

**Coree McCabe**

**Rapid City SD**

**Position:** support

**Comment:**

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

---

**Dean Parker**

**Sioux Falls SD**

**Position:** support

**Comment:**

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

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

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

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

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

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

---

**Sara Parker**

**Sioux Falls SD**

**Position:** support

**Comment:**

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

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

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

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

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

---

**Kim Zilverberg**

**Brookings SD**

**Position:** support

**Comment:**

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

---

**Natalie Galasso**

**Mamaroneck NY**

**Position:** support

**Comment:**

No comment text provided.

---

**Mary Lonowski**

**Brookings SD**

**Position:** support

**Comment:**

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

---

**Kelly Morgan**

**Rapid City SD**

**Position:** support

**Comment:**

I SUPPORT the 24-hour trap check rule change

---

**Jack Morgan**

**Rapid City SD**

**Position:** support

**Comment:**

I SUPPORT the 24-hour trap check rule change

---

**Faisal Khan**

**Vadadro IN**

**Position:** support

**Comment:**

Parrot

---

**Taryn Deboer**

**Parkston SD**

**Position:** support

**Comment:**

No comment text provided.

---

**Jamie Al-Haj**  
**Rapid City SD**  
**Position:** support

**Comment:**

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

---

**Maria Hatch**  
**Rapid City SD**  
**Position:** oppose

**Comment:**

Please implement a 24 hour trip check rule

---

**Linda Torlay**  
**Fort Myers FL**  
**Position:** support

**Comment:**

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

---

**Julie Padilla**  
**Madison WI**  
**Position:** oppose

**Comment:**

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

---

**Sheena Thomas**  
**Sioux Falls SD**  
**Position:** support

**Comment:**

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

---

**Kasie Heiden**

**Vermillion SD**

**Position:** support

**Comment:**

No comment text provided.

---

**Jared Heiden**

**Vermillion SD**

**Position:** support

**Comment:**

No comment text provided.

---

**Jill Andersen**

**Sioux Falls SD**

**Position:** oppose

**Comment:**

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

---

**Meliss A Dassinger**

**Rapid City SD**

**Position:** oppose

**Comment:**

Trapping is a part of the Midwest way of life.

Trapping had become much more

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

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

Do not give an inch to the animal rights ideologues.

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

---

**Julie Padilla**

**Madison WI**

**Position:** support

**Comment:**

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

---

**Joan Frevik**

**Sioux Falls SD**

**Position:** support

**Comment:**

Support checking traps every 24 hours.

---

**Janet Lowe**

**Wessington Springs SD**

**Position:** support

**Comment:**

No comment text provided.

---

**Lisa Sullivan**

**Bainville MT**

**Position:** oppose

**Comment:**

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

---

**Melissa Cosme**

**Spearfish SD**

**Position:** support

**Comment:**

I support the 24 hour check times!

---

**Chancey Feller**

**Pierre SD**

**Position:** oppose

**Comment:**

No comment text provided.

---

**Tonya Graham**

**Sioux Falls SD**

**Position:** other

**Comment:**

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

---

**Jenny Walker**

**Gretna NE**

**Position:** oppose

**Comment:**

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

---

**Jennifer Watters**

**Parma OH**

**Position:** oppose

**Comment:**

Please change times to every 24 hours!!

---

**Ellen Watters**

**Parma OH**

**Position:** support

**Comment:**

No comment text provided.

---

**J W**

**Parma OH**

**Position:** support

**Comment:**

Does not meet the criteria - no first or last name

---

**Sally Hamlin**

**Pierre SD**

**Position:** other

**Comment:**

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

---

**Stephanie Samavarchian**

**Rapud City SD**

**Position:** support

**Comment:**

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

---

**Sheri Whitethorn**

**Madison SD**

**Position:** oppose

**Comment:**

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

---

**Kim Bullus**

**Sioux Falls SD**

**Position:** support

**Comment:**

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

---

**Tommi Lundgren**

**Sioux Falls SD**

**Position:** support

**Comment:**

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

---

**Leah Boule'**

**Whitehall NY**

**Position:** oppose

**Comment:**

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

---

**Tina Ladd**

**Los Angeles CA**

**Position:** oppose

**Comment:**

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

---

**Patricia Braun**

**Rapid City SD**

**Position:** other

**Comment:**

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

---

**Madalina Sterpu**

**Indian Wells CA**

**Position:** oppose

**Comment:**

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

---

**Renee Lefthand**

**Freeman SD**

**Position:** oppose

**Comment:**

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

---

**Eden Slate**

**Armour SD**

**Position:** support

**Comment:**

No comment text provided.

---

**Madalina Sterpu**

**Indian Wells CA**

**Position:** support

**Comment:**

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

---

**David Goronja**

**Howard SD**

**Position:** support

**Comment:**

Traps need to be checked more often.

---

**Amanda Hegg**

**Vermillion SD**

**Position:** other

**Comment:**

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

---

**Amanda Hegg**

**Vermillion SD**

**Position:** support

**Comment:**

No comment text provided.

---

**Darsha Cecil**

**Spearfish SD**

**Position:** oppose

**Comment:**

Please have traps checked every 24 hours

---

**Darsha Cecil**

**Spearfish SD**

**Position:** support

**Comment:**

No comment text provided.

---

**Kendra Perry-Koski**

**Winner SD**

**Position:** oppose

**Comment:**

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

---

**Jodi Mercer**

**Rome OH**

**Position:** other

**Comment:**

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

---

**William Lieberman**

**Fort Pierre SD**

**Position:** support

**Comment:**

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

---

**Dale Fisher**  
**Palm Springs CA**

**Position:** other

**Comment:**

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

---

**Chantik Chavez**

**Ontario CA**

**Position:** oppose

**Comment:**

No comment text provided.

---

**Susan Lefler**

**Austin TX**

**Position:** other

**Comment:**

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

---

**Wendy Blegen**

**Britton SD**

**Position:** support

**Comment:**

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

---

**Jamie Campbell**

**Sioux Falls SD**

**Position:** support

**Comment:**

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

---

**Lori Smith**

**Sioux Falls SD**

**Position:** support

**Comment:**

I support the 24 hour trap check rule change.

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

---

**Debi Ulrey-Crosby**

**Brandon SD**

**Position:** support

**Comment:**

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

---

**Rebecca Heisinger**

**Jackson WY**

**Position:** support

**Comment:**

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

---

**Madonna Goodart**

**Rapid City SD**

**Position:** support

**Comment:**

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

---

**Mia Lancaster**

**New York NY**

**Position:** other

**Comment:**

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

---

**Charron Barnes**

**Trufant MN**

**Position:** support

**Comment:**

No comment text provided.

---

**Christy Rodgers**

**Spearfish SD**

**Position:** support

**Comment:**

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

---

**Sue Hayes**

**Deadwood SD**

**Position:** support

**Comment:**

No comment text provided.

---

**Stephanie Ellison**

**Huntington Beach CA**

**Position:** support

**Comment:**

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

---

**Misty Kuhnert**

**Brandon SD**

**Position:** oppose

**Comment:**

Every 24 hours is needed

---

**Christy Kellen**

**Sioux Falls SD**

**Position:** oppose

**Comment:**

This should be every 24 hours not 2 or 3 days

---

**Kasie Crisp**

**Colman SD**

**Position:** support

**Comment:**

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

---

**Amber Pontius**

**Spearfish SD**

**Position:** support

**Comment:**

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

---

**Allen Harwood**

**Spearfish SD**

**Position:** support

**Comment:**

No comment text provided.

---

**Gail Harwood**

**Spearfish SD**

**Position:** support

**Comment:**

No comment text provided.

---

**Dennis Harwood**

**Spearfish SD**

**Position:** support

**Comment:**

No comment text provided.

---

**Travis Springer**

**Spearfish SD**

**Position:** support

**Comment:**

No comment text provided.

---

**Therese Pontius**

**Lead SD**

**Position:** support

**Comment:**

No comment text provided.

---

**Dave Pontius**

**Lead SD**

**Position:** support

**Comment:**

No comment text provided.

---

**Roxanne Berglund**

**Lead SD**

**Position:** support

**Comment:**

No comment text provided.

---

**Chad Berglund**

**Lead SD**

**Position:** support

**Comment:**

No comment text provided.

---

**Jerry Pontius**

**Deadwood SD**

**Position:** support

**Comment:**

No comment text provided.

---

**Wyatt Harwood**

**Spearfish SD**

**Position:** support

**Comment:**

No comment text provided.

---

**Seth Harwood**

**Spearfish SD**

**Position:** support

**Comment:**

No comment text provided.

---

**Sonja Vermillion**

**Sioux Falls SD**

**Position:** support

**Comment:**

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

---

**Paula Pillatzki**

**Labolt SD**

**Position:** other

**Comment:**

Do not support trapping at all.

---

**Heidi Madsen**

**Carpenter SD**

**Position:** support

**Comment:**

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

I would appreciate your support of 24 hour trap check time

---

**Doneica Shapiro**

**Prescott AZ**

**Position:** support

**Comment:**

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

---

**Margarett Beverly**

**Rapid City SD**

**Position:** support

**Comment:**

Please check traps daily

---

**Kathy Grosz**

**Sioux Falls SD**

**Position:** oppose

**Comment:**

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

---

**Shawna Lutz**

**Rapid City SD**

**Position:** support

**Comment:**

Animals are needlessly suffering!

---

**Charlotte Petrick**

**Rapid City SD**

**Position:** support

**Comment:**

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

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

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

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

---

**Natasha Mehrer**

**Lead SD**

**Position:** support

**Comment:**

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

---

**Tricia Rosatti**

**Minot SD**

**Position:** oppose

**Comment:**

Make it LAW for NO TRAPPING!!!!

---

**Denise Chappina**

**Killeen TX**

**Position:** support

**Comment:**

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

---

**Amber Christians**

**Whitewood SD**

**Position:** support

**Comment:**

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

---

**Amanda Hofmann**

**Groton SD**

**Position:** support

**Comment:**

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

---

**Courtney Huse-Wika**

**Spearfish SD**

**Position:** support

**Comment:**

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

---

**Teresa Hicks**

**Rapid City SD**

**Position:** support

**Comment:**

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

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

---

**Brittany Moyer**

**Sioux Falls SD**

**Position:** support

**Comment:**

No comment text provided.

---

**Amber Beckham**

**Aberdeen SD**

**Position:** support

**Comment:**

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

---

**James Marshall**

**Spearfish SD**

**Position:** support

**Comment:**

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

---

**Aaron Clem**

**Wentworth SD**

**Position:** support

**Comment:**

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

---

**Lori Linco**

**Rapid City SD**

**Position:** support

**Comment:**

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

---

**Courtney Pierce**

**Spearfish SD**

**Position:** oppose

**Comment:**

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

---

**Eles Van Otterloo**

**Sioux Falls SD**

**Position:** support

**Comment:**

No comment text provided.

---

**Surayni Calandra**

**Commack NY**

**Position:** oppose

**Comment:**

Duplicate

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

---

**Surayni Calandra**

**Commack NY**

**Position:** oppose

**Comment:**

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**Position:** oppose

**Comment:**

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---

**Lindsey Keller**

**Milbank SD**

**Position:** support

**Comment:**

No comment text provided.

---

**Mayra Abogado**

**Sioux Falls SD**

**Position:** support

**Comment:**

No comment text provided.

---

**Rashel Olesen**

**Sioux Falls SD**

**Position:** oppose

**Comment:**

I support the 24 hour trap check rule change.

---

**Samantha Abbott**

**Spearfish SD**

**Position:** support

**Comment:**

No comment text provided.

---

**Rashel Olesen**

**Sioux Falls SD**

**Position:** support

**Comment:**

I support the 24 hour trap check rule change.

---

**Rosey Quinn**

**Hartford SD**

**Position:** support

**Comment:**

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

---

## Chronic Wasting Disease

**Kelly Peterson**

**Milbank SD**

**Position:** oppose

**Comment:**

No comment text provided.

---

**Eric Schoenfelder**

**Lake Andes SD**

**Position:** oppose

**Comment:**

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

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

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

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

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

Thanks,



Nancy Hilding  
President  
Prairie Hills Audubon Society

Nancy Hilding  
President  
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Comments on the SD Mountain Lion Plan Revision,

General Topics

### **Prairie Lions**

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

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

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

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

Article V of the 1851 Treaty provided in pertinent part:

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

Article 17 of the 1868 Treaty provided:

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

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

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

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

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

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

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

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

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

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

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

District.

## Lions in Cities or Suburban Areas

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

## Depredations

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

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

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

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

## **People Attacks**

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

[https://en.wikipedia.org/wiki/List\\_of\\_fatal\\_cougar\\_attacks\\_in\\_North\\_America](https://en.wikipedia.org/wiki/List_of_fatal_cougar_attacks_in_North_America)

## **Public Education**

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

## **Values:**

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

[https://wsfrprograms.fws.gov/subpages/nationalsurvey/national\\_survey.htm](https://wsfrprograms.fws.gov/subpages/nationalsurvey/national_survey.htm)).

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

earned from hunting/fishing licenses or Pitman-Robertson.

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

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

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

## **Cougar Population Goals**

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

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

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

The bar chart on Figure 13 shows the Wyoming and SD populations against increasing, stable and decreasing thresholds. SD GFP should provide us with the km<sup>2</sup> values used by both states to calculate that bar chart. Wyoming's lion habitat area values have increased in size with time, as they get better data. This means at first they were dividing by too small a number. SD GFP should clearly explain the theories & data sets Wyoming uses to generate their share of the bar chart & juxtapose the theories & data sets SD uses to estimate their bars within the chart. As far as we know you all use different data & calculate via different theories/models.

SD GFP give Fescke's km<sup>2</sup> value for Black Hills area & high quality habitat. Fescke's Black Hills area refers to Wyoming & SD and her high quality habitat value just refers to Forest Service lands (excluding other state, federal & private lands). Please explain the area value you use for the Black Hills Fire Protection District.

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

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

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

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

### **Subsets in the Black Hills**

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

### **Other comments:**

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

Thanks,



Nancy Hilding  
President  
Prairie Hills Audubon Society

## Causes of Mountain Lion (*Puma concolor*) Mortality in South Dakota (1996–2017)

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

9/27/17 11:53 AM

Baseman

9/27/17, 11:53 AM  
Basemal

### Legend

11000 11010

1

### Public removal

1

Deer Hunting Units (2014)

1

ecotone buffer

6-2017)  
color) Mortality in South Dakota (1996-2017)

Chapman  
Ri w

9/27/17, 11:53 AM  
Basement

<http://www.arcgis.com/apps/MapTools/index.html?appid=3c08b298b7e6433a9a659e796d3a4f4d&extent=-108.3123,41.8583,-93.6016,47.4996>

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# MOUNTAIN LION FOUNDATION

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August 30, 2019

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Respectfully,



Lynn Cullens

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