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August 16th, 2024

SD Game, Fish and Parks
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<https://gfp.sd.gov/forms/positions/>

Comments on SDGFP's Mountain Lion Action Plan – Draft July 2024.

The Department had a mt lion stakeholder meeting on Mt Lion Plan Amendments – May 28th, 2024 and invited attendees, who included PHAS. The invitees were skewed towards hunters -- invited were 8 hunter groups, 2 environmentalists, 1 landowner, 1 Rosebud Sioux Tribe Wildlife Biologist & 1 BHNH biologist. This is an unfair concentration of one type of interest group.

Page 6-page 9, Summary of surveys

Hunters are a subgroup of the general public. Why do you just limit interest groups surveyed to hunters? Why not also survey tourists, wildlife watchers, hikers, nature observers, nature photographers, OHVers, homeowners, & livestock owners? Tourism is a very important economic engine in South Dakota.

You write at page 10:

“The Black Hills population objective is 200-300 total mountain lions”

We thank you for keeping the population objectives in the Black Hills Fire Protection District at 200-300.

You write at page 10:

“Population objectives for mountain lions on the prairie habitats of South Dakota have not been established. Survey data are lacking for mountain lions on the prairie and these areas are managed primarily to abate potential livestock losses on private property while at the same time to provide recreational hunting opportunity.”

We completely disagree on your objectives for the prairie/statewide unit. We believe that Rosebud Sioux Tribe and Oglala Sioux Tribe have habitats to support small populations of lions. There may be habitat over by the Missouri River, near Yankton Sioux Tribe or along the Cheyenne River at Cheyenne River Sioux Tribe or at Custer-Gallatin National Forest lands. You need to develop a better attitude & concern toward tribal lions.

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We specifically focus our comments on pages 10-11 on Strategies and Objectives.

Please refer to page 10:

You write for Objective 1:

“Monitor and assess mountain lion populations by conducting scientifically based

biological surveys within South Dakota.....

d) Estimate abundance of mountain lion population in the Black Hills.

• Evaluate alternative methods to improve estimate of abundance.

• Evaluate alternative indices to improve detection of population

trend.”

Please Collect Population Data on Tribal Mt. Lions.

We believe there are breeding populations on Rosebud Sioux Tribe (RST) and Oglala Sioux Tribe’s (OST) lands. Both allow hunting of mountain lions. We believe both Tribes wish to keep mt. lions and don’t seek to extirpate them.

In the late 19th Century and early 20th Century various Allotment Acts were passed that allowed Native American Reservations to be broken up, with pieces of them kept for tribal members and pieces given to Caucasian settlers. The Native’s unfamiliarity with taxes and Caucasian ways

contributed to even further & substantial transfers of Native owned lands to Caucasians.

Reservations in SD can have checker boarded area's with jurisdictions mixed. Take Mellette County, which is about half Native and half Caucasian. A female lion with proof of lactation was killed there in Mellette just over the border from Todd County. The management of mountain lions in and around Reservations, would ideally require cooperation and SDGP has more resources for collection of population data than tribes do.

You should have an objective to work with tribes to collect population data, especially in any checker board ownership areas or in nearby areas, if the tribes request or want such.

Connectivity Corridors

GFP should provide for connectivity corridors between the Black Hills with Reservation properties -- because small populations need immigrant mt. lions to refresh their population genetics

Transparency

There should be an objective to be transparent with population and mortality data you have collected. This should be especially true for the prairie/statewide unit, where you have less population data.

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Please refer to page 11:

You write for the title of Objective 2:

“Manage mountain lion populations for both maximum and quality recreational hunting opportunities, considering all social and biological inputs.”

We find this sentence to be deeply offensive. Hunting means death. You are managing lions to be killed by people – recreational sacrifice is their purpose to your agency.

Mountain lions are an apex predator and as such they are a keystone species. They are an iconic & symbolic species. They deserve more respect. You need a more balanced statement -- that you manage for mountain lions to serve their vital function in the ecosystem as an apex predator, while providing for quality recreational experiences for wildlife watchers and for hunters and being sensitive to the social tolerance. The social and biological inputs should not be secondary to recreation use of hunting but rather the multiple uses should be more balanced. At the very least, the word maximum needs to be dropped.

Wildlife watchers exceed hunters in USFWS studies that counts wildlife associated recreators nationwide at-home and away from home. (<https://digitalmedia.fws.gov/digital/collection/document/id/2321/>). A “harvested” lion or its’ tracks are not available for watching. The locally derived statistics the SDGFP uses for number of wildlife watchers vs. hunters in SD, does not count wildlife watchers at home, while it counts hunters at home – thus it is unfairly biased & is inadequate. (Southwick Study - [SD-Fish-Wildlife-Boating-Economics-Southwick-6-30-22.pdf](https://www.southwick.com/SD-Fish-Wildlife-Boating-Economics-Southwick-6-30-22.pdf))

Various studies show that intense and maximized hunting of lions can increase young male lion ratios and increase conflicts with livestock/humans. Maximizing hunting can lead to greater social intolerance. We refer you to Wielgus’s video: https://www.youtube.com/watch?v=2_ZD-PAKhSo You should not have an objective to maximize hunting.

You write for part b) of Objective 2:

“b) Modify and adopt hunting season structure as needed to minimize regulation complexity.”

This is another clause that displays your absolute and total bias towards hunting/hunters. When Prairie Hills Audubon Society (PHAS) proposes rule changes designed to mitigate cruelty to animals related to hunting, staff normally objects -- because any new complexity is a constraint on hunting!

State statutes on animal welfare allow that any hunting practices approved by SDGFP are not animal cruelty. You have a fiduciary duty to wildlife to

create mitigations that make hunting/trapping less cruel – those mitigations might make hunting regulations more complex.

You write for part b) of Objective 2:

- *In the Black Hills Fire Protection District (BHFPD), excluding Custer State Park (CSP): maximize hunting opportunity for unique hunters allowing unlimited boot hunting with harvest regulated primarily through restricted season lengths and harvest limits.*

Thanks

We opposed allowing hound hunting of lions in the rest of the BHFPD. Here is a link to PHAS reasons for opposing hound hunting: <https://phas-wsd.org/wp-content/uploads/Hound-hunting-objections.pdf>

We would like to thank staff and the Commission for deciding to oppose adding hound hunting of mountain lions to the Black Hills Fire Protection District outside of CSP.

Your harvest limit for female lions in the BHFPD is too high and needs to be lowered.

You write for part b) of Objective 2:

- *In CSP: maximize hunting opportunity for hunters with dogs with harvest regulated primarily through limited permits and restricted season lengths.*

We object to hound hunting of lions, so we disagree with an objective to maximize hound hunting opportunity. Custer State Park is a State Park and serves recreators some who don't hunt and some of whom will object to hunting wildlife with hounds.

You write for part b) of Objective 2:

- *Outside BHFPD: emphasis to minimize potential human conflicts with mountain*

lions and maximize hunting opportunity for hunters with dogs allowing unlimited permits and a year-round season.

We totally disagree with your prairie/statewide unit's objectives. We object to the 365-day hunting season.

We object to the use of dogs, especially in areas where there may be few trees or rock out-cropping for the lions to escape the dogs. Lions are not designed for long runs and need to escape dogs by climbing above them.

We believe the prairie unit needs to be divided up into smaller sets -- in areas with better cougar habitat, a different hunting season would be approved. For example, the Caucasian areas in and around RST and OST Reservations could have different harvest limits and season length than the rest of prairie/statewide unit. Custer-Gallatin National Forest or banks of the Missouri River could have different harvest limits and season lengths. You could recognize the better cougar habitat in some areas in the prairie/statewide unit and manage those sub-sets differently.

Sincerely

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

Nancy Hilding
President
Prairie Hills Audubon Society