

COMMENTS ON SOUTH DAKOTA WILDLIFE DAMAGE MANAGEMENT ACTION PLAN 2026-2030

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RE: South Dakota Department of Game, Fish and Parks Wildlife Damage Management Action Plan, 2026-2030 (Wildlife Division Report 2026-01, March 2026)

The Prairie Hills Audubon Society appreciates the opportunity to comment on the proposed Wildlife Damage Management Action Plan. While we recognize the challenges faced by agricultural producers, we have significant concerns regarding the Plan's heavy reliance on lethal control methods, particularly for coyotes and beavers, when peer-reviewed scientific research demonstrates that non-lethal alternatives are more effective, more cost-efficient, and more sustainable.

I. COYOTE CONTROL: SCIENTIFIC EVIDENCE SHOWS LETHAL CONTROL IS COUNTERPRODUCTIVE

The Plan's Strategy 1.1 emphasizes "proactive and aggressive coyote control efforts" and prioritizes lethal methods including aerial gunning, trapping/snaring, thermal imaging, and M-44 cyanide devices. This approach is not supported by the best available science and may actually exacerbate the problems it seeks to solve.

A. Compensatory Reproduction Makes Lethal Control Self-Defeating

Multiple peer-reviewed studies demonstrate that culling coyotes as a form of population control is often unsuccessful and frequently results in the opposite effect (Minnie et al., 2016; Newsome et al., 2017). Coyotes exhibit two well-documented compensatory responses to population reduction:

1. **Compensatory Reproduction:** When coyote populations are reduced through lethal control, the remaining females demonstrate higher reproductive output through earlier breeding age and larger litter sizes (Sacks, 2005). Studies show that killing 75% of a coyote population every year for 50 years would still not exterminate the population due to this compensatory response.
2. **Compensatory Immigration:** As soon as an area is cleared of coyotes, it is almost immediately reinhabited by neighboring individuals (Minnie et al., 2016; Newsome et al., 2017). Vacant territories are quickly filled by "floater" individuals or nearby packs.

Research demonstrates that to achieve any population reduction, a minimum of 70% of the coyote population must be killed on a sustained basis—a threshold that is almost never achieved and cannot be maintained (Connolly & Longhurst, 1975). Even the frequently-cited 1975 Connolly & Longhurst study, which USDA Wildlife Services has relied upon for decades to justify large-scale coyote eradication, actually concluded that lethal management of coyotes is NOT an effective method for population control.

B. Disruption of Social Structure Increases Livestock Depredation

Indiscriminate lethal control disrupts coyote pack social structure in ways that can actually increase conflicts with livestock:

- Exploited coyote populations have younger, less experienced coyotes that haven't been taught appropriate hunting behaviors, making them more likely to prey on livestock and pets (Project Coyote, 2020).
- Orphaned young coyotes must fend for themselves and in desperation will prey upon livestock and become livestock killers, whereas they would not have done so if their pack structure remained intact.
- Stable coyote packs with established territories are less likely to prey on livestock than disrupted populations with numerous yearlings reproducing.
- Most livestock depredation is caused by alpha/breeding coyotes, which are the most resistant to non-selective removal techniques.

C. The Scientific Consensus Opposes Indiscriminate Lethal Control

Over 70 prominent conservation scientists have condemned indiscriminate coyote killing as counterproductive and a threat to healthy ecosystems. There is no credible evidence that indiscriminate killing of coyotes effectively serves any beneficial wildlife management purpose.

In 2017, 17 conservation organizations joined a formal complaint under the Information Quality Act challenging USDA's reliance on flawed science to justify coyote eradication programs. The complaint, supported by Dr. Jane Goodall and numerous top North American canid researchers, argued that USDA continues to ignore a growing body of scientific literature on the effectiveness of non-lethal means of preventing coyote predation and the biological necessity of carnivore populations in stabilizing regional ecosystems.

D. Non-Lethal Alternatives Are More Effective

Research shows that non-lethal livestock protection methods are more effective than lethal control:

- Livestock guardian animals (dogs, llamas, donkeys)
- Electric fencing designed for predator exclusion
- Range riding and increased human presence
- Fladry (flagging) and other visual deterrents
- Carcass removal (eliminating attractants)
- Improved animal husbandry practices

- Targeted hazing and frightening devices

Studies demonstrate that integrated non-lethal approaches provide superior long-term protection compared to lethal control. A 2017 seven-year case study comparing areas with lethal control to those protected by range riders, turboladry, guardian dogs and other non-lethal methods showed significantly better outcomes with non-lethal approaches (Stone, 2017).

E. Recommendations for Coyote Management

We urge SDGFP to:

3. Revise Strategy 1.1 to prioritize non-lethal livestock protection methods over lethal control.
4. Eliminate or severely restrict indiscriminate lethal methods (aerial gunning, M-44 devices, non-selective trapping) that disrupt coyote social ecology.
5. If lethal control is deemed necessary, limit it to confirmed problem individuals using selective methods, not broad population reduction.
6. Provide technical and financial assistance to producers for implementing proven non-lethal methods.
7. Conduct and publish data comparing the effectiveness of lethal vs. non-lethal approaches in South Dakota.
8. Acknowledge in the Plan the scientific evidence showing that indiscriminate lethal control is counterproductive.

II. BEAVER MANAGEMENT: NON-LETHAL METHODS ARE MORE EFFECTIVE AND ECONOMICAL

The Plan mentions beavers only in passing and provides no detail about beaver management strategies. Given that beavers are listed as one of the species WDS staff work with, and "furbearers" are mentioned in Strategy 1.2, the Plan should include specific provisions for beaver management with emphasis on non-lethal methods.

A. Flow Devices Provide Permanent, Cost-Effective Solutions

Non-lethal beaver management through flow devices (pond levelers, culvert protection systems, beaver deceivers) has been proven effective since at least the 1920s and has evolved into highly reliable technology:

- Properly designed and installed flow devices create a permanent leak in beaver dams that beavers cannot stop, maintaining water levels while preventing flooding.
- Flow devices protect culverts from being blocked by excluding beavers from the immediate area through fencing systems.
- These devices, when properly installed and maintained, are the most cost-effective and longest-lasting beaver management methods.

B. Lethal Control Is Expensive and Temporary

Killing beavers and destroying their dams is rarely a permanent solution:

- A 2006 survey found that trapping as a solution to beaver problems had a 79% failure rate within two years due to resettlement by new beavers.
- Any good beaver territory will be claimed by new beavers, resulting in a continual cycle of flooding, infrastructure damage, repairs, and repeated annual killing.
- Removing beavers eliminates the valuable ecosystem services they provide (water storage, wetland creation, biodiversity enhancement, flood mitigation, drought resilience, wildfire breaks).

C. Documented Cost Savings with Non-Lethal Management

Multiple long-term studies demonstrate the economic superiority of non-lethal beaver management:

Billerica, Massachusetts (20-year study, 2000-2019):

- 55 beaver conflict sites studied
- Sites managed with non-lethal flow devices cost \$229/year per site
- Sites managed with lethal trapping cost \$409/year per site
- Annual savings: \$7,740 with non-lethal management
- Number of beavers killed dropped more than fivefold
- Sites provided millions of dollars of ecological services that would have been lost with beaver removal

Alberta, Canada and Other Studies:

- Flow devices have proven effective across diverse landscapes
- Properly installed devices continue to function with minimal maintenance
- Economic benefits increase over time as devices remain functional while trapping must be repeated annually

D. Beavers as a Climate Resilience Asset

Beavers are increasingly recognized as a valuable tool for climate adaptation:

- Beaver wetlands slow snowmelt and runoff, reducing flood damage
- Beaver ponds store and cool water underground, providing drought resilience
- Beaver complexes serve as firebreaks in wildfire-prone areas
- Beaver wetlands remove sediment and pollutants, improving water quality
- Beaver habitat supports biodiversity including fish, birds, and other wildlife

Given South Dakota's vulnerability to both floods, droughts and perhaps inadequate ground water supplies for growing populations West River, maintaining beaver populations where appropriate and managing conflicts through non-lethal means serves multiple public interests.

E. Recommendations for Beaver Management

We urge SDGFP to:

9. Add a specific strategy under Goal 1 addressing beaver management with priority given to non-lethal methods.
10. Develop expertise among WDS staff in designing, installing, and maintaining flow devices.
11. Provide technical assistance and cost-share programs for landowners to install flow devices rather than defaulting to lethal removal.
12. Partner with organizations like The Beaver Institute, Beaver Solutions, and state agencies that have successfully implemented non-lethal beaver management programs.
13. Conduct demonstration projects showing the effectiveness and cost savings of flow devices.
14. Acknowledge in the Plan the ecosystem services beavers provide and the economic advantages of non-lethal management.
15. Reserve lethal removal for only those situations where flow devices are not feasible and document why non-lethal methods were rejected.

III. NEED FOR SCIENCE-BASED MANAGEMENT

The Plan states it will "emphasize working cooperatively with interested publics" and support "coexistence with wildlife." However, the heavy emphasis on lethal control, particularly the "proactive and aggressive" approach to coyotes, contradicts these stated values.

True coexistence requires:

- Reliance on best available peer-reviewed science
- Prioritization of non-lethal methods
- Lethal control only as a last resort for confirmed problem individuals
- Transparent reporting of methods used and their effectiveness
- Evaluation of whether lethal programs achieve their stated goals

We recommend that Strategy 1.2's language about "proven and reliable methods" be amended to specify "scientifically-proven" methods and that the Plan commit to regular evaluation of whether its approaches are achieving the desired outcomes or whether, as the science suggests, they may be counterproductive.

IV. TRANSPARENCY AND ACCOUNTABILITY

SDGFP publishes an annual Wildlife Damage Management report, most recently the Fiscal Year 2024 WDM Annual Report. We acknowledge this as a positive step toward public accountability. The report covers program funding history, staffing, and a statewide summary of activities involving coyote and predator control, deer and elk depredation, Canada goose damage, beaver management, prairie dog control, and other wildlife conflicts including hawk and owl control to protect poultry. We appreciate that this report exists and is publicly available.

However, we note that the annual report, as currently structured, has significant gaps that limit meaningful public oversight. We request that SDGFP expand the annual WDM report and the five-year Action Plan to address the following:

16. Report specific numbers of animals killed by species and method. The current annual report describes program activities in general terms but does not publish species-by-species kill totals or a breakdown by lethal versus non-lethal methods. Taxpayers and the public have a right to know how many animals of each species are killed annually through publicly-funded WDM activities.
17. Report costs of lethal versus non-lethal approaches by species. The annual report notes total program expenditures but does not break down costs by management approach. This information is necessary to evaluate whether the program is investing appropriately in non-lethal alternatives.
18. Report effectiveness metrics. Did problems recur after intervention? How quickly? Were non-lethal approaches attempted before lethal ones? Without outcome data, the annual report cannot demonstrate whether the program is achieving its stated goal of building “social tolerance for wildlife.”
19. Clarify the relationship between the WDM annual report and the Nest Predator Bounty Program. The FY2024 WDM Annual Report contains no mention of the Nest Predator Bounty Program, despite the NPBP spending approximately five million dollars in public funds since 2019 on bounties for five native mesopredator species. If the NPBP is a separate program not governed by this Action Plan, SDGFP should clearly state that and identify where it is reported and evaluated. If it is within the WDM program’s scope, it should be included in the annual report.
20. Provide opportunities for public comment on significant changes to methods or priorities between five-year plan revisions.
21. Include conservation and wildlife advocacy organizations in the stakeholder engagement process. The annual report lists the WDM Working Group, ADC Policy Advisory Committee, South Dakota Stockgrowers, predator district boards, SD Sheep Growers, SD Cattlemen, and SD Ag Unity as primary stakeholders. We request that conservation organizations representing the broader public interest in native wildlife be included in these engagement processes on an equal footing.

V. NEST PREDATOR BOUNTY PROGRAM: QUESTIONS ABOUT SCOPE AND TRANSPARENCY

The Prairie Hills Audubon Society requests clarification regarding the relationship between the Wildlife Damage Management Action Plan and the South Dakota Nest Predator Bounty Program (NPBP). The NPBP has operated since 2019 and has expended approximately five million dollars in public funds over seven years offering bounties for the killing of five mesopredator species: raccoons, grey fox, badgers, opossums, and striped skunks. The program was created under the premise that reducing populations of these species increases ground-nesting bird nesting success. The WDM Action Plan contains no discussion of the NPBP whatsoever.

We request that SDGFP clarify the following questions, which we raise in a spirit of genuine inquiry rather than accusation:

A. Why Is the Nest Predator Bounty Program Not Addressed in This Action Plan?

The WDM Action Plan describes itself as guiding how SDGFP manages conflicts between wildlife and human interests, including livestock, crops, and property. The NPBP involves the organized, publicly-funded killing of native wildlife species at statewide scale. We ask: is the NPBP excluded from this Action Plan because it is classified as a wildlife-on-wildlife management issue rather than a wildlife damage to human livestock or property management issue? If so, we request that SDGFP clearly articulate where and how the NPBP is governed, evaluated, and held accountable within the Department's planning framework. There is likely also black-bird killing and cormorant killing for crops and human raised fish.

B. Does the WDM Action Plan Cover Predator Killing Intended to Maximize Prey Available to Human Hunters?

The NPBP raises a broader question about the scope of this Action Plan that we ask SDGFP to address directly. The WDM Program, as described, exists to reduce damage to livestock, crops, and property caused by wildlife. However, the NPBP targets predators not because they damage property, but because they compete with human hunters for popular game species — particularly ground-nesting birds such as pheasants and waterfowl. We ask: does this Action Plan govern, or is it intended to govern, the killing of predator species for the purpose of maximizing prey populations available to sport hunters? This question applies not only to the NPBP but potentially to coyote control as well, given that coyotes prey on deer, elk, pheasants, and other species valued by hunters and that coyote control is the centerpiece of this Action Plan's Strategy 1.1.

We are asking that SDGFP be transparent about whether that is a purpose of this Plan, because the scientific justification, appropriate methods, and public accountability standards differ substantially between predator control to prevent agricultural damage and predator control to shift predator-prey dynamics in favor of species hunted for recreation.

C. Does the WDM Action Plan Apply to Farm-Raised and Hatchery-Released Wildlife?

South Dakota has a significant industry of privately operated game farms and pheasant hatcheries that raise birds for release during hunting season. We ask SDGFP to clarify whether wildlife damage management activities — including predator control — conducted to protect farm-raised or hatchery-released birds fall within the scope of this Action Plan. If predator control is being carried out on behalf of commercial pheasant operations or to protect stocked birds prior to release, we believe this represents a qualitatively different use of the WDM Program than protecting livestock from native predators, and that it warrants separate and transparent accounting.

D. Request for Clarification

We respectfully request that SDGFP address these questions in its response to public comments on the WDM Action Plan, and that the next revision of this plan clearly define its scope with respect to: (1) wildlife-on-wildlife predator management programs such as the NPBP; (2) predator control conducted to benefit sport hunting interests rather than to prevent agricultural damage; and (3) management activities related to commercially raised or hatchery-stocked wildlife. Clarity on these questions is essential to meaningful public oversight of a program that expends significant public funds and has substantial impacts on native wildlife populations.

VI. PRAIRIE DOG MANAGEMENT: SOUTH DAKOTA MUST HONOR ITS COMMITMENTS

The 2026–2030 Wildlife Damage Management Action Plan addresses prairie dogs only in passing — listing them among species WDS staff work with and calling for “direct control measures for prairie dogs that have encroached onto private lands from adjacent public properties” (Action 1.2.4). This minimal treatment ignores a substantial and unmet set of obligations that South Dakota made — in writing, to the federal government and to ten other states — as the explicit basis for keeping management authority over the black-tailed prairie dog in state hands rather than triggering federal Endangered Species Act protection.

A. A Multi-State Agreement — Not Just a South Dakota Plan

South Dakota’s 2005 Black-tailed Prairie Dog Conservation and Management Plan (Cooper and Gabriel 2005) was not developed in isolation. It was one of eleven coordinated state management plans developed under a formal multi-state framework specifically designed to prevent federal listing of the black-tailed prairie dog. The state’s own executive summary is explicit about this purpose: “The State of South Dakota has been participating in interstate prairie dog discussions and planning efforts since late 1998 in a coordinated attempt to avoid any present or future need for threatened species listing under the authority of the federal Endangered Species Act and thereby protect property rights.”

The multi-state framework was built around two foundational documents. The first was the “Black-tailed Prairie Dog Conservation Assessment and Strategy” (Van Pelt 1999), under which eleven states committed “to manage, maintain, and enhance habitat and populations of black-tailed prairie dogs across its historic range and reduce the number of threats impacting their viability.” The second was the “Multi-State Conservation Plan for the Black-tailed Prairie Dog in the United States” (Luce 2003), which stated plainly that “the goal of the CA&S, the MSCP, and eleven state management plans is to remove enough threats to the black-tailed prairie dog that long-term conservation of the species is assured.”

The multi-state plan established specific, measurable national objectives, including increasing total occupied black-tailed prairie dog acreage in the United States to at least 1,693,695 acres by 2011, maintaining at least two prairie dog complexes greater than 5,000 acres in South Dakota (including the Conata Basin/Buffalo Gap complex), and developing nine additional complexes greater than 5,000 acres nationally. South Dakota’s share of the national acreage commitment was 199,472 total acres, with 166,958 of those acres on non-tribal lands (Cooper and Gabriel 2005).

B. These Commitments Are Why the Prairie Dog Was Not Listed as Threatened

On August 18, 2004, the U.S. Fish and Wildlife Service removed the black-tailed prairie dog from its list of federal candidate species, announcing that the species “is not likely to become an endangered species within the foreseeable future.” The USFWS cited specifically that states had made substantial progress including completing population surveys, drafting management plans, enacting laws changing the species’ status from pest to a managed designation, establishing shooting

regulations, and “setting future goals for occupied habitat that will address population management needs for disease and other threats.”

In other words, the federal government stepped back from protecting the black-tailed prairie dog because states — including South Dakota — promised to do it themselves. Those promises included specific monitoring schedules, specific acreage goals, and specific management actions tied to population thresholds. South Dakota has not fulfilled those promises.

C. The Monitoring Commitment Has Not Been Honored

Central to South Dakota’s 2005 plan was a commitment to monitor statewide prairie dog acreage at three-year intervals, and to take specific management actions depending on what those surveys found. The plan established binding action triggers based on non-tribal acreage estimates:

- Above 160,000 non-tribal acres: Continue standard management; conduct surveys every three years.
- Between 125,000 and 160,000 non-tribal acres: Limit state-financed control to encroachment from federal lands only; implement multi-state plague monitoring; increase incentive payments to landowners.
- Below 125,000 non-tribal acres: Implement shooting restrictions on ALL public lands in South Dakota by GFP Commission rule; expand incentive payments statewide.
- If total statewide estimate falls below 145,000 acres: Sales of prairie dog toxicants in South Dakota shall cease except by special permit and only in specific instances (Cooper and Gabriel 2005, Strategy 1.4c).

SDGFP conducted one monitoring survey after the 2005 plan was finalized: the 2006 black-tailed prairie dog colony acreage and distribution survey (Kempema 2007), which found 303,237 non-tribal acres and concluded no management changes were required. Subsequent monitoring has been inconsistent and, at times, well behind the three-year schedule the plan requires. Prairie Dog monitoring reports have not always been conducted on time or made publicly available in a timely manner. South Dakota therefore cannot reliably demonstrate whether it is currently meeting its acreage goals, whether any of the management action thresholds have been crossed, or whether the conditions that justified the federal government’s decision not to list the prairie dog as threatened still exist. This is not a minor administrative shortfall — it is a failure to honor the specific commitments on which federal protection was withheld.

D. Changed Circumstances Require a Full Plan Revision

The 2005 plan was written when sylvatic plague was essentially absent from South Dakota. At the time of finalization, plague had been confirmed in only a single prairie dog in extreme western Fall River County — the first case ever documented in the state — just weeks before the plan was published. The plan’s disease monitoring section was prospective and precautionary. By the time the 2006 monitoring survey was conducted, however, plague had already moved into the state significantly. SDGFP’s own 2006 report documented that approximately 27,000 acres of prairie dog colonies in Shannon County alone had gone inactive after epizootic plague outbreaks, with additional impacts in Fall River and Custer Counties (Kempema 2007).

In the nearly twenty years since, plague has become endemic across much of western South Dakota, periodically devastating colonies across large areas. The multi-state management framework the 2005 plan was built on explicitly acknowledged plague as one of the primary threats justifying federal candidate species consideration. Yet the very plan that was supposed to address plague threats has never been updated to reflect plague's actual establishment in the state.

In addition, the black-footed ferret recovery picture has changed substantially since 2005. Ferret reintroduction sites have expanded beyond the original Conata Basin/Badlands complex to include Wind Cave National Park, Lower Brule Sioux Tribe, Cheyenne River Sioux Tribe, Standing Rock Sioux Tribe, and maybe Rosebud Sioux Tribe. The black-footed ferret is both a federal and state endangered species, and SDCL 34A-8-6 requires SDGFP to take all actions necessary for its conservation and recovery. Prairie dog management — including WDM prairie dog control activities — must be coordinated with ferret recovery managers to avoid federal ESA conflicts. The WDM Plan's Action 1.2.4 contains no such requirement.

E. Recommendations for Prairie Dog Management

We urge SDGFP to:

- Commit to conducting statewide prairie dog acreage monitoring on the three-year schedule required by the 2005 management plan, and publish results in a timely and publicly accessible manner. The monitoring program with its specific acreage thresholds and required management responses was a core commitment to the federal government and ten partner states. Consistent, on-schedule monitoring is essential to demonstrate that South Dakota continues to honor the obligations on which federal ESA listing was deferred.
- Commit in this WDM Action Plan to a full revision of the 2005 Black-tailed Prairie Dog Conservation and Management Plan. The 2005 plan must be updated to reflect current prairie dog population status, the reality of endemic sylvatic plague, current conditions at black-footed ferret reintroduction sites, and revised action thresholds and management strategies appropriate to present circumstances.
- Require that prairie dog control activities under Action 1.2.4 be coordinated with USFWS black-footed ferret recovery managers prior to implementation in any area within or adjacent to active ferret reintroduction zones, to ensure compliance with state and federal ESA obligations.
- Publish annual data on prairie dog control activities — including acres treated, methods used, and geographic proximity to ferret reintroduction sites — as part of the annual WDM report, as the 2005 plan required of an annual summary report to the legislature.

VII. CONCLUSION

The Prairie Hills Audubon Society supports assisting landowners with wildlife conflicts. However, we cannot support an action plan that emphasizes lethal control methods that peer-reviewed science has shown to be ineffective and often counterproductive.

We urge SDGFP to revise this Plan to:

- Prioritize non-lethal methods for coyote management
- Include specific provisions for non-lethal beaver management using flow devices
- Commit to science-based decision-making
- Provide transparent reporting on methods and outcomes
- Honor the monitoring and management commitments made to the federal government and ten other states in the 2005 Black-tailed Prairie Dog Conservation and Management Plan, update that plan for current conditions, and resume statewide acreage surveys every three years as promised
- Clarify the relationship between this Action Plan and the Nest Predator Bounty Program, and address the questions raised in Section V regarding predator control for hunter benefit and management of hatchery-raised wildlife

We would welcome the opportunity to discuss these concerns with SDGFP staff and to assist in identifying resources and expertise for implementing effective non-lethal wildlife damage management.

Respectfully submitted,

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