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SD Game, Fish and Parks Commission
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 –
PHAS letter number 2.

The draft Action Plan has the following **title for 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. We believe that SDGFP unjustly and unfairly focuses on providing opportunity to hunters/fishers/trappers while neglecting the impacts of such activities on wildlife watching. When the hunting “harvest” is not compensatory, it results in fewer fish/wildlife in the world, thus there are less wildlife/fish for wildlife watcher to watch.

The word “maximum” should be dropped and/or the entire sentence rewritten. We suggest this clause makes human recreation dominant over ecology. It does not adequately balance the ecological benefits of mountain lions, an apex predator and keystone species with benefits of human recreation. SD has an endangered species act and thus the legislature does not wish for populations of any native species to become extirpated.

Wildlife watchers exceed hunters in USFWS studies and a “harvested” lion or its’ tracks are not available for watching. Wildlife watchers exceed

hunters in USFWS study that counts wildlife associated recreators nationwide at-home and away from home. To download the study visit: <https://digitalmedia.fws.gov/digital/collection/document/id/2321/> and go to Table 2 on page 48 & Table 6 on page 51.

SD is in the West North Central area, which has 16,677,887 persons, who are 16 years or older. 9% of these folks (or 1,518,281 persons) hunted. 58% of these folks (or 9,744,740 persons) wildlife watched. Some people did both. Of the wildlife watchers – 4,624,145 wildlife watched away from home (28% of all persons) & 9,664,190 wildlife watched around home (58% of all persons). Some people did both.

The locally generated 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 an unfairly biased/inadequate study**. Here is the link to the Southwick study: [SD-Fish-Wildlife-Boating-Economics-Southwick-6-30-22.pdf](#). This 2017 study at page 25, table 29 shows 173,825 wildlife watchers (residents – 89,277 persons & non-resident -84,548 persons). All are only watching away from home. At page 8, table 1 the study shows 103,619 resident hunters & 112,174 non-resident hunters or 215,793 total hunters. It does not delete at home hunting.

So the USFWS finds the number of hunters are only 15% of the number of wildlife watchers but the 2017 Southwick study found wildlife watchers are just 80% of the hunters. USFWS is only counting the west north central region's people and Southwick is counting SD residents and non-residents. Southwick does not count at home wildlife watchers, but USFWS does and in so doing more than doubles the hunters.

We believe SDGFP with its' devotion to hunters is using biased data to continue to justify that devotion.

Thanks,



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