



January 11, 2020

TO: South Dakota Game Fish & Parks Commission

FROM: South Dakotans Fighting Animal Cruelty Together (SD FACT)

RE: Nest Predator Bounty Program Overview discussion

Dear Sec. Hepler, Director Kirschenmann, Chairman Jensen, and Members of the Commission;

South Dakotans Fighting Animal Cruelty Together (SD FACT) writes strongly in opposition to any proposed discussion about continuing the Nest Predator Bounty Program into the future and to any potential Department Sponsored Legislation for 2020. With support from over 4,000 members, we provide the following:

We remain vehemently opposed to the inhumane Nest Predator Bounty Program (NPBP). The long check-times, the lengthened season, and the unlimited numbers allowed all contribute to the inevitability of suffering for target animals and those that are indiscriminately trapped by happenstance.

There does not appear to be any scientific review of predator numbers and the effect of the bounty program upon these species. As a public resource, it is vital that accurate and unbiased information concerning predator numbers be researched. Also, given the vital role provided by these native species and their control of ticks and other disease-carrying varmints, a review of potential negative effects on human health is required.

We are requesting the Commission reverse their position to forego an environmental impact assessment under SDCL 34A-9-4 on the bounty program given these serious concerns. Failure to gather information and conduct assessments concerning the continuation of this radical program would be knowingly negligent and a clearly unwarranted abuse of your discretion as a public entity in charge of preserving a public resource and maintaining public health.

Destruction of these species does not appear to have resulted in any pheasant population increase, according to the Commission's own 2019 pheasant population survey conducted during the end of last year's bounty program period.

https://gfp.sd.gov/userdocs/docs/PBR_2019FINAL.pdf. This indication that the program is

unsuccessful matches the scientific consensus concerning these mass slaughter programs.

- 54,460 killed [not including maternally dependent offspring]
- \$1.5 million taxpayer monies expended
- \$10/tail

We once again remind you that every animal has its role to play in an ecosystem & contributes to human health & quality of life. Here's why these varmints are so important to all of us.

Raccoon

Raccoons are highly intelligent. Raccoons are scavengers and therefore are an important part of cleaning up carrion. They also dine on many other species we consider pests when numbers get out of control, including snakes, frogs, lizards, wasps and rats.

Striped skunk

Skunks do an amazing job at helping to keep insect populations in check, insects like grasshoppers, beetles, crickets and wasps. Skunks are one of the best examples of how an animal we really want to avoid is actually one we want to keep around.

Badger

Scientists call the badger a sentinel species, one that provides clues about the health of its ecosystem. They are excellent hunters of earth-dwelling prey including rabbits, groundhogs, ground squirrels, mice and snakes.

Opossum

The reality is, opossums are incredibly useful, and typically misunderstood. Ticks, particularly the black-legged ticks like deer ticks that are responsible for the spread of Lyme disease, appear to be a top item on the opossum's menu. Just one opossum eats, on average, 5,000 ticks each year.

Red fox

These varmints have a helpful side for farmers and ranchers. Like their larger canid cousin the coyote, red foxes are wonderful at keeping rodent populations down. They hunt chipmunks, rats, mice, voles and all sorts of other small rodents that can become more of a pest to humans than the foxes themselves. They also eat carrion and like other supposed varmints on this list, are part of an important cleanup crew for their ecosystem.

Trapped animals can languish and die slowly from shock, dehydration, starvation and exposure to the elements. In addition, because the NPBP was initiated when these animals are rearing their young, those babies are left to die a cruel death when their mothers are killed...for their tail, in a self-proclaimed "pro-life" state. Each year, traps in the United States injure and kill millions of "nontarget" animals. Because of this cruel and unnecessary practice and the importance of the animals involved, SD FACT strongly

opposes the Nest Predator Bounty Program and urges the commission to consider all aspects of the ecosystem.

Finally, as tax paying citizens we vehemently object to the needless expenditure of public funds on this exercise. It is also your duty to spend public monies wisely and preserve our way of life for the “next century” by meeting our constitutional budgetary obligations of which this unscientific, ideological giveaway runs far afield.

Respectfully submitted,

SD FACT Board of Directors

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