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**Subject:** Request an end to the ineffective and wasteful Nest Predator Bounty Program

Dear South Dakota Legislator,

I am writing to respectfully request your consideration to end the Nest Predator Bounty Program by supporting legislation to do that.

In 2019, at the direction of Gov. Noem, the South Dakota Game, Fish, & Parks (GFP) agency created the Nest Predator Bounty Program (NPBP), in hopes of boosting pheasant and duck populations by paying bounties to the general public for killing native animals that eat eggs and hatchlings, namely 5 native species: red fox, badger, striped skunk, opossum and racoon. I oppose the NPBP because bounty programs have been shown by wildlife biologists not to work. The GFP acknowledges that there is no data showing that NPBP has increased the pheasant population. Research shows that predator control programs lack efficacy, and money would be better spent on habitat conservation.

**There are many reasons why predator bounty programs do not improve nesting success.** Common sense might tell you that killing predators leads to less predators. However, when their numbers dip, predators have more babies. **Compensatory reproduction** is a biological phenomenon where a population increases its birth rate (by lowering the breeding age, or allowing more individuals to breed due to reduced competition for food/territory), increases litter size, or increases offspring survival in response to population decline (often from predation or human removal) to offset losses, effectively making population control efforts ineffective or even counterproductive

**Ground nesting birds and nest predators co-evolved together over eons.** These predators are an important part of the ecosystem. They also eat insects, grubs, and rodents, and are meant to be on the landscape keeping everything in balance. When mesopredators are removed, the ecological niche is very often filled by a feral cat or a bird from the Corvid (crow) family, predators not targeted by the NPBP.

Research shows that areas of higher predator activity correlate to lower incidents of tick-borne disease such as Lyme disease in humans<sup>1,2</sup>. The lower prevalence of predators on the landscape is attributed to the higher incidents of these diseases on the east coast versus the western US, because **tick-borne diseases go up when rodent predator numbers go down**. Predators can

indeed lower the number of ticks feeding on disease-prone rodent hosts, and changes in predator abundance has cascading effects on human health that I don't believe GFP has considered.

**Non-target species are trapped**, such as the Plains Spotted Skunk and Swift Fox, which are priority conservation species at the state level. According to a former GFP staff I know, there was no way to tell if the rotting tails he processed were from one of these priority conservation species, or one of the 5 eligible species.

The public has never been given a full audit of the cost of this program. We know that **at least \$4.5 million has been spent on implementing the program and paying bounties** (\$1.7 million in 2019 includes live trap give aways<sup>3</sup> and \$2.3 million in bounty payments<sup>4</sup>) but this doesn't include staff time. The former GFP staff that I talked to said NPBP staff time is considerable and very unpleasant (having to go through bags of rotting maggoty tails). They informed me that ample GFP staff hours have been spent driving up and down the highways to spray paint on the tails of road kill, so bounties could not be collected on them, rather than performing the conservation duties that GFP staff have trained for.

The reason why bounty systems fail is because their impact is haphazard and too diffuse to work. Predator removal *can* have a small, short-term positive effect on nesting success only under specific conditions: when it is carried out at small nesting sites (not statewide), conducted by a dedicated team (not the general public), and when all nest-predator species are removed including feral cats and corvids, not just these 5 native species. This is entirely different from what the NPBP does. A cost-effective alternative is habitat improvement projects, which have proven to be effective in increasing ground nesting bird populations, and can leverage an influx of substantial federal dollars into the state.

I work in grassland ecology and understand that grassland birds face steep population declines. Creating and preserving connected habitat is the scientifically sound action that yields results. These birds need tall native grassland to hide from all predators (not just these 5), for winter grains, and a diversity of forbs. Ranchers are increasingly learning to defer grazing on more land each year, which provides bird habitat, while creating a stockpile of forage that can be utilized outside the nesting season, increases plant species diversity, and overall increases the forage production per acre. In fact, one of the highest indicators of nesting success currently is the proximity to Conservation Reserve Program (CRP) land. Many studies show that nesting success is not a function of predator abundance, but rather the availability of protective habitat<sup>5, 6, 7</sup>.

If the \$4.5 million+, that has been wasted on the NPBP, were instead spent on habitat restoration, the state would have qualified for a 75% reimbursement through the Pittman-Robertson Wildlife Restoration Act (PR Act), administered by the U.S. Fish and Wildlife Service, for state wildlife conservation projects. If the \$4.5 million+ were leveraged to pay for 25% of conservation projects, and the other 75% were paid by the federal PR Act, this would have meant \$13.5 million in federal monies invested in developing healthy ecosystems in South Dakota.

The NPBP is unduly cruel because it corresponds to the breeding and brooding season for these native mammals (April-July). When nursing mothers are taken, their babies die from cold and starvation. **Traditional (purposeful) trapping is done in the winter, when fur is prime, and young are independent, to do so otherwise is unethical.** Fur and skins are magnificent materials created by God. They are what allowed our ancestors to migrate north out of Africa and should not be wasted. However, the submission of tails and program season is antithetical to preserving a pelt. Why is GFP encouraging this senseless waste?

In the 1960's sixteen states had fox bounty programs. In **no state** did the bounty program reduce fox populations, and in North Dakota the bounties had the opposite effect and actually increased fox numbers.

Bounty systems are not supported by legislators in other Great Plains states: 1) state bounty programs ended in Minnesota in 1965 (SF2016); 2) North Dakota Legislature discontinued state-funded bounty programs in 1961 (HB610); 3) a similar nest-predator bounty program was rejected in legislative session 2023 (LB400) in Nebraska; 4) raccoon bounty program was effectively defeated in Iowa's state legislature in 2024 (HF2665).

This bounty program is not accepted by South Dakotans. In 2019-2020, the GFP received hundreds of public comments from hunters, scientists, wildlife professionals, NGOs, sportsmen clubs and local residents, over 90% of which opposed the NPBP. The 2019 survey that SDGFP paid for<sup>8</sup>, conducted by Responsive Management, has scandalous methodology. Few respondents knew anything about the NPBP at the start and their opinions were shaped by the survey itself. Furthermore, 92% of the respondents were men. I hope GFP knows that the state of South Dakota is comprised of more than 8% women, and that they are charged with serving all residents. A detailed analysis of the Responsive Management survey is listed below<sup>9</sup>. A much larger and more representative survey was conducted by the Remington Research Group in 2020 and shows that a vast majority of South Dakotans do not support this program<sup>10</sup>. Their research methodology can be found here<sup>11</sup>.

Your support would emphasize the importance of funding strategies that produce measurable outcomes, rather than continuing to spend well over \$500,000 annually on a program that has shown no evidence of success.

Sincerely,

*Janet Moore*

P.S. I'm a free-range chicken enthusiast. I've always locked my chickens up every evening in their coop, and so have never had a problem with any of the 5 NPBP species. The only predator that has ever gotten one of my chickens was a magnificent hawk!

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2. Richard S. Ostfeld, disease ecologist, various publications:  
<https://www.caryinstitute.org/science/our-scientists/dr-richard-s-ostfeld?page=11>
3. Second Century Initiative Live Trap Give Away Program:  
[https://gfp.sd.gov/userdocs/docs/2020\\_Bounty\\_Information\\_-\\_Fisk\\_and\\_Robling.pdf](https://gfp.sd.gov/userdocs/docs/2020_Bounty_Information_-_Fisk_and_Robling.pdf)
4. SD Nest Predator Bounty Program "Tail Tracker" Dashboard:  
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7. Intensive Seasonal Predator Removal Had Little Effect on Duck Nest Success in Waterfowl Production Areas <https://npshistory.com/publications/wildlife/nbs-rib/94-80.pdf>
8. 2019 Survey by Responsive Management  
[https://gfp.sd.gov/UserDocs/nav/2019\\_Nest\\_Predator\\_Bouny\\_Program\\_Survey\\_Report.pdf](https://gfp.sd.gov/UserDocs/nav/2019_Nest_Predator_Bouny_Program_Survey_Report.pdf)
9. Analysis of 2019 Responsive Management survey <https://phas-wsd.org/wp-content/uploads/03SocialSurveyAnalysisNPBP.Alexey.pdf>
10. 2020 Survey by the Remington Research Group  
<https://www.humaneworld.org/sites/default/files/docs/South-Dakota-General-Election-Survey.pdf>
11. Remington Research Group methodologies <https://remingtonresearchgroup.com/about/>