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SD Game, Fish and Parks Commission  
523 East Capitol Ave  
Pierre, SD 5701

Dear SD GFP Commissioners.

Please revoke your approval of the Nest Predator Bounty Program (NPBP) . Please do not continue it's 2026 funding.

### **Nest Predator Bounty Program Doesn't Work - Habitat Improvement Does**

Kristi Noem during her 2018 campaign for governor promised a predator control program to protect pheasants. It is questionable if nest predator bounty programs work to protect ground nesting birds.

In 2019 the SDGFP had the Management Plan for Ring Necked Pheasants. 2016-2020 (<https://gfp.sd.gov/UserDocs/nav/pheasant-mngmnt-planpdf.pdf>) Page 11 of the Plan is about predator control. It concludes:

"We recommend that habitat management be used as the primary tool to encourage pheasant population growth (see pheasant habitat best management practices section of this plan). Predation likely has an exaggerated impact on pheasant populations where sub-optimal habitat exists. Where predator control may be considered as a management option, managers should be aware that cost, logistics, and lack of effectiveness often limit success when compared to habitat management."

We wonder why SDGFP did not follow the direction of it's management plan in 2019.

The impacts of the Nest Predator Bounty Program's statewide bounty are too diffuse. The number of predators the Nest Predator Bounty Program (NPBP) killed in 2019, when overlapped with pheasant range, was 1.07 predators killed per square mile of their range. We provide a link to a 2020 letter submitted to SDGFP Commission, by Larry Fredrickson, a former Pheasant Research Biologist and State Furbearer Biologist (1960-1996) Chamberlain, SD. He objects to the Program and explains in 2 and a fifth pages, why this bounty program won't work to enhance pheasant populations: [https://phas-wsd.org/wp-content/uploads/Fredrickson.2.16.2020\\_LettersNPBP-Public\\_Comments\\_2020.pdf](https://phas-wsd.org/wp-content/uploads/Fredrickson.2.16.2020_LettersNPBP-Public_Comments_2020.pdf)

Improvement of habitat enhances ground nesting bird's nesting success & populations. Habitat improvement reduces predation on the birds. Habitat improvements get matching funds, thus doubling or tripling the impacts.

If your goal is to help increase bird populations, habitat improvement not predator control is the best investment.

### **Trapping Promotion**

SDGFP will try to defuse arguments about the NPBP' effectiveness at protecting birds, by explaining you are also trying to recruit persons, especially youth, to become trappers. Nothing in the statute that gives authority for GFP's bounty programs ([SDCL 40-36-9](#)) enables GFP to use bounties to bribe persons to become hunters or trappers.

There was substantial public comment in opposition in 2019 & 2020, to the NPBP with at least 90% of commentators opposed to the bounty program. In 2020 the Commission responded by reducing the bounty bribe from \$10/tail to \$5/tail. In 2020 the number of tails submitted was cut about in half. \$5/tail was not enough to entice to the desired levels of trapping participation. GFP promptly reverted to the earlier \$10 bounty bribe.

SDGFP provides a leasing agreement, that people who want to reserve a room at Outdoor Campus West must sign. On the second page of the agreement is the following statement, that applicants must agree with if they want to reserve a room: "Groups using the room must be clubs or organizations that ....(c) support and promote fish and wildlife conservation/management which recognizes that hunting, fishing and trapping are highly coveted recreational activities and important tools of wildlife management;" (yellow emphasis added). (Link to room rental policy - <https://phas-wsd.org/wp-content/uploads/Room-Policy-2022-2023-.pdf>)

So SDGFP wants groups to affirm trapping is a **"highly coveted recreational activity"**, while it also justifies spending probably 5 million over 7 years to bribe people to trap. If it is a "highly coveted recreation activity, why is a \$5 bounty inadequate to turn out trappers? Are they in it for recreation or are they motivated by money earned? Why do we have to spend so much treasure to bribe people to trap, an activity that GFP wants OCW room renters to affirm is a **"highly coveted recreational activity"**?

Prairie Hills Audubon Society has opposed the Nest Predator Bounty Program since its' inception.  
Thanks



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