

# Public Comments

## Nest Predator Bounty Program

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**Susan Braunstein**

**Rapid City SD**

**Position:** oppose

**Comment:**

I am writing to strongly oppose the continuation of the Nest Predator Bounty Program. Last year 50,000 animals were killed in the name of "outdoor family fun." This is wrong on so many levels. The slaughter of our native animals will not help pheasants or other game birds. The low number of pheasants in the state is due to loss of habitat and wet weather. If the Game Fish and Parks wants to increase the number of game birds it must focus on habitat, primarily grasslands and wetlands, work with landowners to secure areas through incentives, provide hunter access through a strong walk-in program and raise suitable funding to get it done.

Hunters that I know cannot see any sense to decimating native wildlife species over non-native birds. Either the pheasant can survive the South Dakota ecosystem including, native wildlife, or we as a state have no business protecting and regulating them.

The bounty programs blames the wildlife when in reality humans want pheasants without providing enough shelter belts and grasslands to support a healthy population. When I contacted Keith Fish to ask if there have been and studies on the populations of the targeted predators he said there had not been any type of study. Numerous wildlife biologists have stated that bounty programs simply do not work.

Please don't do this again. The money could be better spent on habitat. Take the time to create a scientific, well-thought out, humane program to address this complex issue. Thank you for your time.

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**Carol Merwin**

**Rapid City SD**

**Position:** oppose

**Comment:**

No comment text provided.

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**Roberta Cosby**

**Bruce SD**

**Position:** oppose

**Comment:**

No comment text provided.

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**Suzan Nolan**

**Rapid City SD**

**Position:** oppose

**Comment:**

I emphatically oppose the Bounty Nest Predator program on the basis of its cruelty to animals, and it is not necessary. What is important is to increase habitat, not kill animals. This is intolerable and I ask that you do not reinstate this program

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**Jason Jensen**

**Henry SD**

**Position:** support

**Comment:**

No comment text provided.

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**Richard Lee**

**Rapid Coty SD**

**Position:** oppose

**Comment:**

My position is anti-bounty. Spend the tax payers money on habitat purchases and/or habitat improvements at a reduced level and receive a portion of the cost from the Pittman Robertson funds.

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**Paul Lepisto**

**Pierre SD**

**Position:** oppose

**Comment:**

Please see the attached comments from Kelly Kistner, president of the South Dakota Division of the Izaak Walton League of America, on the Nest Predator Bounty Program.

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**Janine Betts**

**Oacoma SD**

**Position:** oppose

**Comment:**

Please do not add to the mistake of last years terrible decision to implement this Bounty Program. It is wrong on every level of caring for our wildlife populations and teaching our youth of the importance of every animal in the chain of survival. Use those funds to boost pheasant habitat, public hunting areas and education on helping them not by unmercifully killing the natural predators. This is wrong. SD deserves better leadership.

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**John Hopple**

**Black Hawk SD**

**Position:** support

**Comment:**

No comment text provided.

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**Terry Batchelder**

**Rapid City SD**

**Position:** oppose

**Comment:**

"Please do not add to the mistake of last years terrible decision to implement this Bounty Program. It is wrong on every level of caring for our wildlife populations and teaching our youth of the importance of every animal in the chain of survival. Use those funds to boost pheasant habitat, public hunting areas and education on helping them not by unmercifully killing the natural predators. This is wrong. SD deserves better leadership."

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**Donna Fisher**

**Deadwood SD**

**Position:** oppose

**Comment:**

Recommendation: Please derail these unwise uses of my tax dollars; use them to provide genuine incentives for pheasant habitat protection and development and training of professional trappers.

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**Cara Feckers**

**Lennox SD**

**Position:** oppose

**Comment:**

No comment text provided.

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**Jeanette Williams**

**Vermillion SD**

**Position:** oppose

**Comment:**

This program was a disaster. I do not want you to spend my money to encourage children to kill innocent animals. You ought to be ashamed of yourselves. This is not what we hired you for.

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**Kim Tysdal**

**Rapid City SD**

**Position:** oppose

**Comment:**

Cannot believe we are even revisiting this senseless act of cruelty. It has been proven that habitat is essential for a healthy pheasant population. What is wrong with the administration of South Dakota??? Please stop this inhumane destruction of our very helpful predators. They are God's clean up crew. SDGFP you, if anyone should know this!

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**Sheryl Plagmann**

**Mitchell SD**

**Position:** oppose

**Comment:**

Please do not do this again! It is not the answer that will solve the problem. Improved habitat is needed.

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**Brenda Moss**

**Vermillion SD**

**Position:** oppose

**Comment:**

No comment text provided.

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**Kathryn Hess**

**Summerset SD**

**Position:** oppose

**Comment:**

Please don't kill all these wonderful animals. You are not only killing the adults, but the young in the dens. This is shameful. You can't attribute low number of pheasants to these animals. There are no pheasants on the western part of the state, yet you killed animals here needlessly. On the eastern part of the state it can be attributed to mowing ditches, pesticides and other things that farmers do now days.

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**Brenda Verdon**

**Willow Lake SD**

**Position:** oppose

**Comment:**

I am so against this cruel death of animal's ~ I believe every living thing on this earth has a purpose. It haunts me so much thinking of the killing of these animals and so many babies being starved to death because someone killed their mother for a tail!!!!!!

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**Kim Benning**

**Redfield SD**

**Position:** oppose

**Comment:**

Please stop this inhuman government funded animal abuse program.

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**Annette Hof**

**Crooks SD**

**Position:** oppose

**Comment:**

No comment text provided.

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**Madonba Goodart**

**Rapid City SD**

**Position:** oppose

**Comment:**

This did nothing to improve pheasant numbers. Listen to SD - do not continue to waste our dollars on this!

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**Teresa Hicks**

**Rapid City SD**

**Position:** oppose

**Comment:**

I strongly oppose this program. Complete waste of lives and money. And it won't increase the pheasant population.

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**Brenda Thomas**

**Interior SD**

**Position:** oppose

**Comment:**

Please stop the Nest Predator Bounty Program.

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**Vicki Orris**

**Clark SD**

**Position:** oppose

**Comment:**

Its cruel and stupid and DOES NOT teach sportsmanship or any type of humain conservation.

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**Jen Hubert**

**Vermillion SD**

**Position:** oppose

**Comment:**

it's a waste of money vs the results  
better cheaper ways to help the birds, like habitat conservation

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**Barbara Felderman**

**Rapid City SD**

**Position:** oppose

**Comment:**

There is absolutely no rational for this horrific program. It has been proven on many fronts that these animals are NOT the reason for reduced pheasant populations. AS YOU KNOW it is because of reduced habitats and weather...the wet conditions and flooding have decimated them.  
These animals are part of our ecosystem and keep things in balance. I fear ticks and Lyme disease more than these animals.  
The spending of tax payer money ( of which I am a part) is ludicrous when it could be spent on bridges, roads or education.  
Start thinking with your heads and not Noem's senseless. STOP THIS PROGRAM NOW!!!

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**Deanna Leach**

**Jefferson SD**

**Position:** oppose

**Comment:**

No comment text provided.

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**Gena Parkhurst**

**Rapid City SD**

**Position:** oppose

**Comment:**

No comment text provided.

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**Brittany Kimball**

**Brandon SD**

**Position:** oppose

**Comment:**

No comment text provided.

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**Tracy Gilkyson**

**Vermillion SD**

**Position:** oppose

**Comment:**

No comment text provided.

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**Cheryl Stone**

**Fort Pierre SD**

**Position:** oppose

**Comment:**

Please consider alternatives to this cruel practice.

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**Carol Kendall**

**Rapid City SD**

**Position:** oppose

**Comment:**

Please end this brutal program. I taught school for 35 years and know how impressionable young minds are. We can't have children equate good wholesome outdoor family time with the need to maim and kill. Please please stop this senseless program.

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**Kathleen Anderson**

**Hot Springs, SD**

**Position:** oppose

**Comment:**

SHAMEFUL and ignorant program. We all know it the habitat that needs addressing.

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**Eva Bareis**

**Rapid City SD**

**Position:** oppose

**Comment:**

This was horrific last year, biologists say it won't work, it's being done for a non native bird. As one who works with troubled youth, having kids participate in the trapping and killing of animals at a young age can be psychologically harmful.

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**Sharon Donahoe**

**Vermillion SD**

**Position:** oppose

**Comment:**

No comment text provided.

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**Carlena Hart**

**Prescott AZ**

**Position:** oppose

**Comment:**

We already are losing so many species on this planet. Please stop this program

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**Angela Schladoer**

**Vermillion SD**

**Position:** oppose

**Comment:**

This program is cruel and detrimental to the natural ecosystem. Please discontinue the program

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**Lauren Long**

**Rapid City SD**

**Position:** oppose

**Comment:**

In going forward with this program, we are working to wipe out natural predators that are important in the hierarchy of the environment. On top of that, we should be teaching children conservation through smart hunting practices or through appreciating and visiting our great parks throughout the state.

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**Jamie Al-Haj**  
**Rapid City SD**

**Position:** oppose

**Comment:**

This Nest Predator Bounty Program has no place in South Dakota. For the 2nd year, you are hearing overwhelming opposition to the program. As stewards of South Dakota wildlife your responsibility as commissioners is to make decisions that are in the best interest of our wildlife and the people of our state. We are speaking out against a barbaric program that has NO scientific basis and hence has attempted to be sold as an outdoor activity for children's enjoyment. You are not listening! The governor's determination to implement this idiotic program again this year, makes absolutely no sense! We all know the money being spent could be beneficial if it was applied to habitat improvement. Your vote should weigh heavy on your conscience!!

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**Elizabeth Skarin**  
**Sioux Falls SD**

**Position:** oppose

**Comment:**

Please discontinue this program.

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**Maia Moore**  
**Brookings SD**

**Position:** oppose

**Comment:**

This program is embarrassing to South Dakota and ineffective. Please reconsider!

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**Stacey Sturma**  
**Sioux Falls SD**

**Position:** oppose

**Comment:**

No comment text provided.

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**Cynthia Peterson**  
**Brookings SD**

**Position:** oppose

**Comment:**

Seems unnecessary and trapping is an inhumane way of predator control.

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**Melissa Mccauley**

**Sioux Falls SD**

**Position:** oppose

**Comment:**

Please stop!

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**Anne Chrisman**

**Rapid City SD**

**Position:** oppose

**Comment:**

This is an unecessary program and cruel to the animals trapped. To leave them suffering in a trap waiting for days to die is not right.

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**Joy Stevens**

**Billings MT**

**Position:** oppose

**Comment:**

1. Trapping is inhumane, barbaric, and outdated.
  2. The SCIENCE shows that trapping does not reduce predator numbers. In fact, it increases predator births. Stop with the opinion based decisions and follow the SCIENCE.
  3. This is a black eye to the state of South Dakota. Although I live in Montana, I have family ties to the state and I am watching. I will NOT spend any money in the state until this changes.
  4. If is unfathomable to me that the state would encourage the teaching of this practice to children. Again, SCIENCE has shown that abuse of animals leads to the abuse of humans. Not all, but if even one child goes on to harm a human because of the seeds this practice plants, that's one too many and you own it.
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**George L. Heiserman**

**Spearfish SD**

**Position:** oppose

**Comment:**

I oppose the Nest Predator Bounty Program. I think it is cruel and a waste of money.

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**Melody Dennis**

**Deadwood SD**

**Position:** oppose

**Comment:**

Please do not do this again. Learn to be respectful of our wildlife. It didn't help the pheasant numbers. Just caused pain and suffering to defenseless animals. Please, for once do the right thing. Stop this cruelty

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**Nancy Rosenbrahn**

**Rapid City SD**

**Position:** oppose

**Comment:**

I cannot believe that you are teaching children to trap live animals, kill them and cut off their tails. There is no rational for this. And you have to know that all those animals are not dead when the tails are removed. You have concocted a reason for this program that is full of holes and not based on truths. We are not stupid or unaware. Do your job right.

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**Kari Hultgren**

**Sioux Falls SD**

**Position:** oppose

**Comment:**

No comment text provided.

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**Cameron Stalheim**

**Sioux Falls SD**

**Position:** oppose

**Comment:**

No comment text provided.

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**Carmen Toft**

**Sioux Falls SD**

**Position:** oppose

**Comment:**

No comment text provided.

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**Cory Ferguson**

**Rapid City SD**

**Position:** oppose

**Comment:**

The nest predator program is fiscally irresponsible. The money is desperately needed on habitat programs that actually do provide a return on the investment.

Habitat improvements can be cost effective. Predation is much lower when sufficient habitat for nesting birds is established.

Successful nesting will not occur where there is not sufficient habitat, regardless if most predators are removed or not.

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**Mardell Burckhard**

**Sioux Falls SD**

**Position:** oppose

**Comment:**

Stop this cruel killing of these animals.

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**Dawn Perault**

**St. Paul MN**

**Position:** oppose

**Comment:**

As a person who grew up on a ranch in western SD, went to SDSU, and continue to revisit my family ranch, I find the bounty program entirely against prairie land stewardship. By encouraging the young to hate and kill the very animal species that make our prairie state unique, you are denying SD its own identity and biodiversity. I have found that after leaving SD, I have come to value it so much more than when I lived there. The main thing I notice now many jackrabbits, grouse, foxes, badgers, and antelope--never is more like it. Why keep killing them for trying to survive in such a hostile state with no appreciation for these creatures that are here for a purpose.

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**Michael Huber**

**Sioux Falls SD**

**Position:** oppose

**Comment:**

No comment text provided.

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**Brandon Miklos**

**Arlington SD**

**Position:** support

**Comment:**

My opinion on tail bounty program would be to take the fox off list and add coyotes. Fox population is already low enough and coyotes are at an all time high! While shed hunting I've seen a lot pheasant feather patches where coyotes have killed them and even caught them on trail camera. They're also getting crazy brave coming closer to my farm after my birds almost every night.

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**Anne Weyer**

**Sioux Falls SD**

**Position:** oppose

**Comment:**

This program costs money that could be directed to better, more measurable programs for youth.

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**Carmen Muessigmann**

**Clark SD**

**Position:** oppose

**Comment:**

This is a cruel and ineffective program. Maybe talk to all the land owners farming every inch of land they can thus destroying habitat and nesting grounds. That is your culprit!

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**Bethany Brown**

**Limington ME**

**Position:** oppose

**Comment:**

No comment text provided.

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**Sharon Blais**

**Sioux Falls SD**

**Position:** oppose

**Comment:**

This is so cruel and inhumane. This program is nothing but a bunch of bull shit. Money should be spent on feeding the hungry in our state. As for the animals, we have invaded their territory I am so disappointed to even be a resident of this state. Get your shit together Noem and do what is right for our communities. If you can not fulfill your duties then get the hell out. So far you have done nothing in the states favor. Truly disappointed of your actions. Get the hell out of the office.

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**Dana Wigg**

**Sioux Falls SD**

**Position:** oppose

**Comment:**

I have four years in the field of Humane Law Enforcement- and have always followed the laws and ethics of the laws. I recall finding traps containing animal skeletons because the owner didn't care to check for months. Every person who borrowed a trap from a Humane Society needed education in trapping; protecting the trap, checking it, baiting, and humane treatment of the animal. A majority did not follow the rules though they were provided protection and necessities for humane trapping (and releasing- according to the situation).

This bounty program is not a family-friendly program- this is a sick incentive; something I would never expect from a Governor.

In addition, a number of hunters come to the state to rent/buy hunting dogs and release them into rural areas during hunting seasons and end up tied up, shot, or are picked up by Humane Society workers (not AC city workers). I've dealt with far too many cases of traps with a contained animal (or the WRONG type of animal)- without protection from the elements. Even a single day is far too long for an animal to remain in a trap without some humane protection.

I support hunting, love my steaks, and love my state. Yet this program makes me sick. End it. End the happy family tail amputation promotions- I am ashamed that our Governor appears to be so interested in furs and national promotion that she also appears to be blind to the ethical issues surrounding this policy.

Our state will face further criticism for the tail bounty program if it's reenacted. And opposers will not give up the fight.

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**Amanda Borchert**

**Black Hawk SD**

**Position:** oppose

**Comment:**

I understand that Pheasant hunting brings in revenue. However, we need to focus on our native wildlife and habitat restoration.

Additionally, the predator prey cycle will only ensure a later burst of predators.

Use your science degrees.

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**Patrice Williamson**

**Lead SD**

**Position:** oppose

**Comment:**

This is unacceptable! And horrible! Stop the slaughter!

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**Terasa Vancoppenolle**

**Tampa FL**

**Position:** oppose

**Comment:**

After reading and hearing of this program, I am appalled at the humans that support such heinous acts against living creatures. Have you forgotten this land is their home?

As a tourist, this act alone will keep me from visiting and spending my dollars in your state.

Please rethink this effort and be supportive of a kind and compassionate world.

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**Deb Zimmerman**

**Sturgis SD**

**Position:** oppose

**Comment:**

Please listen to our own wildlife/ecology experts and quit destroying the ecological system for the advantage of one species( not a native one at that) and the folks who rent out their land for that species harvesting.

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**Andrea Young**

**Hill City SD**

**Position:** oppose

**Comment:**

I would like to see some concern and effort for developing the habits for the benefit of animals and those of us that actually loving being in the outdoors. The first thing you guys think of is killing...cyanide bombs, traps near trails, now this. Another decade and will lose the grandness of the Black Hills and the excitement when you see animals in the wild. Very short sided and a focus on hunting tourist dollars rather than the people who love the BH.

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**Patty Jenkins**

**Brandon SD**

**Position:** oppose

**Comment:**

Foolish expensive program that only benefits a few. Cruelty to animals and offspring. Give it up, focus on something more beneficial to all.

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**Antoinette Miller**

**Sioux Falls SD**

**Position:** oppose

**Comment:**

No comment text provided.

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**Douglas Hart**

**Huron SD**

**Position:** oppose

**Comment:**

Please STOP this program. It is cruel and unjust. These animals have been around since the beginning of time and they need to survive also. This is a total waste and MISUSE of TAXPAYERS/MY money and it needs to STOP.

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**Krista Knapp**

**Custer SD**

**Position:** oppose

**Comment:**

Protecting our natural wildlife should be our priority over pheasant which is not a natural element of wildlife in South Dakota. Pheasant for hunting can be bought as chicks and then added to the hunting enviroment.

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**Judith Joba**

**Keystone SD**

**Position:** oppose

**Comment:**

I am strongly opposed to the nest predator program. Nature knows far better than we do as humans as to the balance of all things. Why do we want to encourage children to KILL things!

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**Lori Stephenson**

**Sioux Falls SD**

**Position:** oppose

**Comment:**

I'm asking the Commission to please reject the Nest Predator Bounty Program for 2020. This is a cruel and antiquated way to manage wildlife. Thank you.

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**Barbara St Clair**

**Brookings SD**

**Position:** oppose

**Comment:**

Please discontinue this program. It is not what South Dakota needs to keep the pheasant populations up. It is inhumane and indiscriminate in the animals that are trapped and killed. Our ecosystems will be affected, and the pheasants may still not increase. Please do not let this Nest Predator Program continue.

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**Kris Norlin**

**Rapid City SD**

**Position:** oppose

**Comment:**

Please do not continue this horrible program. It is not necessary for wildlife management and promotes cruelty to animals in general. Cutting off tails for money is inhumane. Kids can do plenty of other things outdoors to care for our wildlife and environment.

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**Kim Smith**

**Hartford SD**

**Position:** oppose

**Comment:**

The only thing out of control is the coyotes. The issue with birds is there is no crp ground anymore therefore no pheasants,ducks,geese. Pay to keep land into crp ground.

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**Cheryl Feight**

**Burbank SD**

**Position:** oppose

**Comment:**

No comment text provided.

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**John Koons**

**Mitchell SD**

**Position:** support

**Comment:**

I think this is a great program. I do believe that habitat is one of the best things that we can do to promote our Pheasant and Duck populations. As we know habitat is being lost daily and because of that we must do all we can to make sure that nesting is successful in what prime habitat is left. These predators are very efficient at destroying nests and it only makes sense to think the less predators around prime nesting areas the better the chances of success. It is easy to say we need more habitat but until people figure out a way to make that happen, I feel we have to make what we have as viable as possible. I think it would be more humane to shoot predators than to trap them, but that is easier said than done in my experience. I feel if trappers are following the laws and checking traps according to trapping guidelines why shouldn't they be able to trap them. I applaud Governor Noem for trying to do something for the problem. If it also gets a few more kids interested in the outdoors, that would be a bonus.

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**Katherine Brown**

**Black Hawk SD**

**Position:** oppose

**Comment:**

China made the mistake of killing all the sparrows in the 40's because they were considered a pest. They suffered a great famine because the sparrows kept insects in check. What do you suppose will happen to our crops if we destroy our ecosystem just so out of state people can come shoot a few more pheasants? The pheasant isn't even a native species to South Dakota. It was imported from Japan and considered an invasive species.

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**Eden Slate**

**Armour SD**

**Position:** oppose

**Comment:**

No comment text provided.

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**Anne Weiss**

**Madison SD**

**Position:** oppose

**Comment:**

This is a cruel program & an embarrassment to our state.

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**Kasie Crisp**

**Colman SD**

**Position:** oppose

**Comment:**

No comment text provided.

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**Chandra Mengel**

**Rapid City SD**

**Position:** oppose

**Comment:**

This is a cruel program that does not increase the number of pheasants and wastes tax dollars.

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**Susan Leach**

**Pierre SD**

**Position:** oppose

**Comment:**

This is a short sighted and poorly implemented plan that does far more damage than good. The monies spent would be better used to support habitat for pheasant rather than wholesale torture and slaughter of native animals, updating the balance of nature.

According to Pheasantsforever.org, "Through the addition and management of habitat, we not only decrease the impact predators have on existing nests, but also increase the number of nests and population size in the area. This management comes at a fraction of the cost of other predator reduction methods."

Habitat improvements can be cost shared at a rate of 50% to over 75% through a variety of programs. GF&P receives 75% cost share on habitat purchases and improvements through Pittman Robertson funds.

Predation is much lower when sufficient habitat for nesting birds is provided.

Successful nesting will not occur where there is not sufficient habitat, regardless if most predators are removed or not.

What is truly heartbreaking is that your program takes place during the time when the animals are rearing their young, so the trapped parent is no longer available to care for the young, which starve to death. Under your parameters, the trapped animal can suffer for up to 3 days with a broken, mangled leg caught in a trap. This is inhumane.

I hope you will consider stopping the NPBP and apply those funds to better use in the rapeseed of our state.

Sincerely,

Susan Leach

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**Rick Leach**

**Pierre SD**

**Position:** oppose

**Comment:**

No comment text provided.

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**Jessica Bergeron**

**Rapid Cith SD**

**Position:** oppose

**Comment:**

No comment text provided.

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**Suzanne Hodges**

**Rancho Cordova CA**

**Position:** oppose

**Comment:**

No comment text provided.

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**Bonni Hwang**

**Lake Norden SD**

**Position:** oppose

**Comment:**

Please DO NOT pass this program!!!! I have seen no evidence that supports it being a beneficial program! The very animals the dnr are supposed to be protecting, they are being encouraged to help promote the killing of ! It's teaching kids that animals are there to kill, that they are pests and of no value to nature! It is truly an disturbing program! PLEASE DO NOT PASS THIS PROGRAM!

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**Nancy Dahme**

**Aberdeen SD**

**Position:** oppose

**Comment:**

Enough using public money to torture and destroy creatures just to make more money from out of state hunters. Instead, use the money to create habitat or better yet, expand campgrounds where families can really get outdoors and spend QUALITY time together.

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**Heidi Fowler**

**Vermillion SD**

**Position:** oppose

**Comment:**

No comment text provided.

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**John Wrede**

**Rapid City SD**

**Position:** oppose

**Comment:**

Gentlemen: I mailed this letter of complaint to both the Department of Game, Fish and Parks and the US Fish and Wildlife Service on Saturday, February 29, 2019 but learn that it will not arrive before the comment deadline this evening so I attach it here and trust that it will be entered into the public record without error. Please note that copies have been sent to two GFP Commissioners as well. Thank you for the opportunity.  
JMW

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**Roger Dietrich**

**Yankton SD**

**Position:** oppose

**Comment:**

I think this is a wasteful program that is accomplishing nothing. This money could be better spent on improving our parks and habitat for birds which is what is needed in SD.

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**Janna Farley**

**Sioux Falls SD**

**Position:** oppose

**Comment:**

No comment text provided.

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**Katie Cozine**

**Chamberlain SD**

**Position:** oppose

**Comment:**

In regards to the duration of the NPBP in 2020, please consider running it 0 days.

According to an article, [www.pheasantsforever.org/Habitat/Pheasant-Facts/Effects-of-Predators](http://www.pheasantsforever.org/Habitat/Pheasant-Facts/Effects-of-Predators), predator removal and exclusion do not significantly increase the number of nesting birds over the long term. Through the addition and management of habitat, we decrease the impact predators have on existing nests and increase the number of nests and population in an area. 'Predators will continue to eat pheasants and their nests, but weather and habitat conditions will drive population fluctuations'.

Greatly reducing the population of the targeted predators leaves the ecosystem subject to imbalance with rodents and other pests able to flourish. If people chose to utilize poisons and other chemicals to control the pests the environment along with many other species, especially birds and birds of prey, will suffer increased harm.

Letting an animal suffer for days in a trap and then wasting it does not promote responsible hunting or respect for the outdoors and wildlife.

Please consider not running the Nest Predator Bounty Program in 2020.

Thank you for your time.

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**Carol Amerson**

**Altoona IA**

**Position:** oppose

**Comment:**

No comment text provided.

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**Susan Besancon**

**Hermosa SD**

**Position:** oppose

**Comment:**

Please, please, please do not continue this costly, ineffective and cruel program.

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**Kathy Mills**

**Custer SD**

**Position:** oppose

**Comment:**

If you want birds increase habitat.

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**Amanda Hegg**

**Brookings SD**

**Position:** oppose

**Comment:**

This program (and its guidelines) is inhumane and cruel to nest predators and its proposed second year displays serious lack of regard for popular public opinion of the implementation and effectiveness of the program. The method in which you summarized the survey results was misleading to those not trained to interpret and draw conclusions from graphs and without knowledge of how the displayed results represent the actual data. Also, as a member of the scientific community who has read publications on nest predation dating back multiple decades, I can confidently say that this program is not based on conclusions drawn from general scientific literature on nest survival, covariates that impact survival, and relationships to bird populations, and although nest predation is the primary cause of nest failure, the maintenance of bird populations is not solely attributed to predation, but numerous habitat and landscape covariates have been shown to play just as large of a part (among many other time and space specific variables). Why not focus funding in these areas? The disregard of this academic foundation in conservation plans for SD game species by those planning and implementing this program, and the lack of scientific methodology in assessing the impacts of the program by monitoring and modeling nest survival, is disappointing and a very simplistic solution, and quite frankly, sounds like something that was drawn up by a self interested politician. SD- we can do better!!!!

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**Matthew Anderson**

**Colman SD**

**Position:** support

**Comment:**

No comment text provided.

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**Bill Antonides**

**Aberdeen SD**

**Position:** oppose

**Comment:**

No comment text provided.

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**Rita Rauen**

**Watertown SD**

**Position:** oppose

**Comment:**

Spring is when they have their babies. Is really cruel to let all those babies starve to death in there dens.

---

**Nina Ring**

**Scotland SD**

**Position:** oppose

**Comment:**

Strongly oppose a program that did not have any positive results, affects more than the animals killed (aka their young), and encourages children to maim animals for their tails and get paid for it.

---

**Jackie Vaith**

**Menno SD**

**Position:** support

**Comment:**

My 8 and 10 year old sons participated in this last year. We thought it was a great program. Yes they were excited about the money they got, but more than anything they were happy to save nests. We made sure they understood they knew why we were doing it. It wasn't for fun and money. They've been asking for weeks if we can do it again.

---

**Kathleen Keys**

**Pierre SD**

**Position:** oppose

**Comment:**

No comment text provided.

---

**Shwena Thomas**

**Sioux Falls SD**

**Position:** oppose

**Comment:**

This program is a joke and does nothing more than promote animal cruelty. It did nothing for the pheasant population last year and it won't this year. There are better ways to spend our tax money than these nonsense programs that do absolutely no good.

---

**Angie Blansett**

**Rapid City SD**

**Position:** oppose

**Comment:**

No comment text provided.

---

**Albert Chapman**

**Hill City SD**

**Position:** oppose

**Comment:**

No comment text provided.

---

**Sharon Rose**

**Rapid City SD**

**Position:** oppose

**Comment:**

No comment text provided.

---

**Amanda Johnson**

**Yankton SD**

**Position:** oppose

**Comment:**

Hello, my name is Amanda Johnson and I am a voter from Yankton County. I am writing in strong opposition to the Nest Predator Bounty Program. The Nest Predator Bounty Program is a disgrace and an inhumane and cruel program that the majority of South Dakotans are against. If we the voters would have been given an opportunity last year to vote on this program there is no doubt it would not have passed. There are so many reasons this program should not exist. First off, mothers caught in live traps are kept from feeding dependent young so trappers are not just killing the mom, but also the litters of orphaned young they left at their nest to starve. Second, traps are not required to be checked often enough. I urge you to think of the animals trapped suffering from dehydration, starvation and exposure to the elements. Third, many non-target animals are being caught and languish in traps.

As elected officials, you have a duty to ensure the voting public is heard. The opposition to this program is strong so allowing this program to run for a second year is a blatant disregard to the people of this state. If we cannot come up with humane, rational ways to govern, we simply are not trying hard enough. Please stand up for the wildlife and animals in our state.

I hope you will do the right thing and reject this program.

---

**Amy Johnson**

**Yankton SD**

**Position:** oppose

**Comment:**

No comment text provided.

---

**Sarah Ulmer**

**Sioux Falls SD**

**Position:** oppose

**Comment:**

Save our animals, save our money!

---

**Wayne Johnson**

**Yankton SD**

**Position:** oppose

**Comment:**

This is inhumane!! Trapping is torture and it needs to stop!!!!

---

**Ann Naber**

**Meckling SD**

**Position:** oppose

**Comment:**

please end this ill-conceived and wasteful program

---

**Paula Radel**

**Mitchell SD**

**Position:** oppose

**Comment:**

No comment text provided.

---

**Kristi Petersen**

**Hot Springs SD**

**Position:** oppose

**Comment:**

These animals perform a great service to the human. They are part of our biological balance. They should not be destroyed purely to protect a few of an introduced species eggs.

---

**Megan Bordewyk**

**Fort Pierre SD**

**Position:** oppose

**Comment:**

There were no improvements that came from this program. This program did not benefit South Dakota.

---

**Julie Mendelson**

**Summerset SD**

**Position:** oppose

**Comment:**

I am a South Dakota resident, a mom, and a lifelong outdoorswoman. I strongly oppose the Nest Predator Bounty Program. These programs are ineffective, a gross misuse of funds, and disrupt native ecosystems. Furthermore, encouraging children to cruelly trap, murder, and dismember animals is horrid. Certainly not the South Dakota values I want to instill in my children.

---

**Lorin King**

**Mitchell NE**

**Position:** oppose

**Comment:**

These animals are necessary for the ecosystem to work properly.

---

**Vickie Hauge**

**Deadwood SD**

**Position:** oppose

**Comment:**

I would like you to think about the ramifications of this totally non scientific approach that the governor has implemented with your help. This is tipping the natural balance of predator verse mice & rats, etcetera. I have watched from my window coyotes diving into the snow & catching mice. I know that without the raccoons, foxes, coyotes & many other animals on the list to be trapped, the mice, rats & other rodents are going to be a real problem for all of us.

What are we teaching our precious little ones, when it is fun & games to live trap & kill to cut off tails. Isn't this type of behavior in children & adults looked on by most as abuse of animals? We try to make our children compassionate & kind to animals & people, so I really don't understand that this is okay?

Please take this issue to heart & do what is right.

Thank You,  
Vickie Hauge

---

**Nancy Hilding**

**Black Hawk, Sd, 57718 SD**

**Position:** oppose

**Comment:**

Nancy Hilding  
President  
Prairie Hills Audubon Society

I am attaching a letter about the Nest Predator Bounty Program, which I have sent directly to Commissioners e-mail addresses. I now send it to the on-line form so that it ends up in the public record. It will have an attachment, that I will send in my next e-mail.

---

**Cheri Nino**

**Sioux Falls SD**

**Position:** oppose

**Comment:**

Cruel and useless program. Discusting teaching children to kill for sport rather than teaching conserved and preserve.

---

**Nancy Hilding**

**Black Hawk SD**

**Position:** oppose

**Comment:**

Nancy Hilding  
President  
Prairie Hills Audubon Society

On Nest Predator Bounty Program.

I just sent a letter that was supposed to have as attachment the Remington Research Group's public opinion survey. But you can only attach one document per sending... This is the attachment to that former letter.

---

**Amber Steiner**

**Summerset SD**

**Position:** oppose

**Comment:**

This program is cruel. It teaches no one about appropriate wildlife management, there's no incentive to treat the animal with respect and for all anyone knows people were also just chopping off tails and releasing the animal. Also it didn't improve the population of pheasants in any provable way.

---

**Nancy Hilding**

**Black Hawk SD**

**Position:** oppose

**Comment:**

Nancy Hilding  
Prairie Hills Audubon

I attach our 3rd letter

# Nonresident East River Special Deer License

---

**Troy Noem**

**Fruita CO**

**Position:** support

**Comment:**

Would love to see a non-resident, any deer license in eastern SD. I moved from SD 15 years ago. Now have kids that are hunting age, and we go to NE or KS deer hunting. Hard to travel so far just to hunt antler less deer. Also, we already make the commitment to come and pheasant hunt. Would be great to be able to combine both deer and pheasants in 1 trip.

Would also be great for the state to keep my kids who do not grow up in the area to establish a tradition in SD, and keep it going as they grow.

If a fear is accessibility in private land areas, maybe create a requirement that has stated areas they will be hunting on their application. Since East river is so much private land, it could be a way to make sure that the applicant had a game plan and access prior to submitting the application.

I think this would be a win for SD.

---

**William Flood**

**Courtland MN**

**Position:** support

**Comment:**

This is great news! We have been hunting private land east river as non residents for many years and have not been able to get a rifle "buck" tag in a long time. The only thing I would ask is why not make it any deer? in our area (Brule County) the whitetail numbers are very low. The Mule deer numbers are doing great. I would rather take a Mule deer and let the whitetail numbers rebound in our area. Thank you SG GFP for taking this into serious consideration. Non residents contribute to a large part in SD conservation funds every year and it is nice to see that being rewarded in proposals like this one.

---

**George Vandell**

**Pierre SD**

**Position:** oppose

**Comment:**

I am opposed to two proposals:

- 1) open up East river deer to nonresidents - many if not most of these any rifle deer/buck tags are really hard for residents to draw. Please don't allow nonresidents the ability to draw a tag while thousands of resident hunters are turned down every year. This "idea" is driven by commercial hunting interests desiring to make East river deer hunting a rich mans sport. Please vote no!
- 2) rifle turkey hunting. I hunt private land west river. I am now taking my grandchildren on their first turkey hunts. What do I do when we are leaned up against a tree w/ a turkey decoy in front of us and I see a pickup stop on a ridge? The newest rife fad is now long range shooting - totally incompatible w/ safe turkey hunting. Don't put me or my family in danger - please!

---

**Matt Behm**

**Willmar MN**

**Position:** support

**Comment:**

Commissioners,  
Over the past 30 years I have hunted in SD as a Resident and also as a non-resident. I currently reside in MN. I have owned farms in SD and currently have several friends that own farms in and around Buffalo County SD. The availability of non-resident deer licenses is a concern. For the past 24 of 25 years there have been Buck deer licenses available in Buffalo County for non-residents. In 2019 there were non available. At a minimum there should be a reasonable opportunity for non-residents to get a Buck license in the East River Zone. I support making 500 special buck licenses available for non-residents on private land east river.

---

**John Lindell**

**Greenfield MN**

**Position:** support

**Comment:**

I own land in Buffalo County. There are less and less non-resident deer licenses available every year and none were available in the 2019 draw. Meanwhile, it appears residents can have up to 9 licenses. There should be a reasonable opportunity for non-residents to get a buck license.

---

**Bruce Behm**

**Plymouth MN**

**Position:** support

**Comment:**

I own 1600 acres in Buffalo County for 30 years as a non-resident, the last three years our odds of getting rifle deer tag(s) are down to impossible - with none issued last year. I pay taxes, let GFP's net and monitor deer on my property and leave food plots to help the wildlife survive over the winter. Please do the right thing and restore/give non-residents a chance to hunt with our family and friends on our land.

---

**Ryan McKinney**

**Champlin MN**

**Position:** support

**Comment:**

I have the good fortune of having a friend in Buffalo County who owns 1,600 of excellent deer hunting property. Unfortunately, I have only drawn a license once in the last five years. His deer population is very strong and he is a good steward of the land. He has paid taxes for over 30 years, employed local farmers and their families, cooperated with SD game and fish with various projects and provides significant winter habitat. It would be great to once again have an opportunity to enjoy the property with friends and family. Thank you for your consideration.

---

**Randall Hedden**

**Hanover MN**

**Position:** support

**Comment:**

I have hunted deer for the last 15 years in Buffalo County on private land. The last three years have seen our chances of obtaining a license diminish and became unavailable last year. I have supported South Dakota conservation through my many hunting licenses and the general economy through purchases of while in the state. Please allow non residents the opportunity to continue enjoying and supporting SDFG efforts.  
Thanks you

---

**Ron Schara**

**Ramsey MN**

**Position:** support

**Comment:**

Please review your treatment of nonresident hunters as available licenses are near zero. Please review the economic losses to your department as well as local businesses because of your strange license allocation.

---

**Joe Sokolowski**

**Edina MN**

**Position:** support

**Comment:**

I write in support of the petition to issue 500 Nonresident East River Buck Licenses next season. I have travelled to South Dakota and hunted as a nonresident for close to 40 years now. I am grateful for the hunting opportunities that SD has offered, and am respectful of the thoughtful conservation initiatives that have protected the state's natural resources.

One of the true joys of my life has been raising my 2 sons and introducing them to the SD outdoors and the hunting traditions that run deep in my family.

I have a good friend, Bruce Behm, who owns a considerable tract of land in Buffalo County SD (East River) which he manages for wildlife habitat. Bruce has been extremely generous in inviting me and my sons to hunt with him on his property over the years. When he was of age, Bruce invited my son Nick to apply for a Nonresident Buck License so that he could shoot his first whitetail deer. While it didn't come quickly or easily, when my son Nick shot his first whitetail deer--a magnificent Buffalo County 8 point buck--a hunter/conservationist was born for life. Now age 24 Nick hunts snow geese with me in SD in the Spring, and waterfowl and pheasants in SD in the Fall. And he would most certainly hunt East River Deer again if provided the nonresident opportunity.

Bruce extended the same generous invitation to my younger son Jack--to shoot his first whitetail deer in Buffalo County SD--when Jack was of age. While Nick will tell you that his buck, a mount of which is proudly displayed in our home, is bigger than the one that Jack shot several years later on Bruce's farm, no one is quite sure. But Jack's East River deer mount, which is also on our wall and sports 8 impressive points, seems to be grinning at Nick's mount. I suspect that those magic moments I shared with Jack East River deer hunting helped him decide to attend college in Vermillion SD, where he is currently a Junior. Jack fishes the lakes and rivers of SD, and hunts SD snow geese, waterfowl, and pheasants with me and his brother with passionate enthusiasm--something rare in kids these days. Jack also would undoubtedly pursue East River whitetail if afforded the opportunity.

From my recent trips to Buffalo County, I can see the deer populations are robust.

Please help insure that other kids, like mine, get the opportunity to develop an appreciation of the outdoors and carry on our hunting heritage by allowing the issuance of East River Nonresident Buck licenses next year.

Thank you.

---

**Gary Wickre**

**Britton SD**

**Position:** oppose

**Comment:**

Game and Fish officials have met in past years with sportsman's clubs and fellow hunters regarding the restructure of deer license allocation system to provide more resident hunters opportunity to draw a tag in the unit of their choice. Most sportsmen were against this as they were satisfied with the allocation process that was in place at the time. Game and Fish went against the sportsmen's wishes and made the changes. Adding 500 east river non-resident buck tags will decrease the chance for resident hunters to draw tags in the unit of their choice. I also feel that this will commercialize deer hunting and take private property from local hunters. Until you can assure that every resident can receive the tag of their choice, I am strongly opposed to any east river non-resident deer tags.

---

**Kevin Knudson**

**Britton SD**

**Position:** oppose

**Comment:**

I am strongly opposed to the Game and Fish issuing any non-resident east river deer tags as I am unable to be guaranteed the tag of my choice every year.

---

**Joshua Hagemann**

**Mission Hill SD**

**Position:** oppose

**Comment:**

No comment text provided.

---

**Anthony Carpino**

**Gainesville VA**

**Position:** support

**Comment:**

I have family in SD and would like to be able to hunt with my family on there private land. Currently it is impossible for me to draw or to have my son draw a deer tag. Allowing some path for nonresidents to get a deer tag (even if restricted to private land) would promote hunting ( which is on the decline nationwide) and continue a tradition of family hunting together.

---

**Tyler Spomer**

**Bismarck ND**

**Position:** oppose

**Comment:**

Please see my attached comments. I oppose this proposal. However, I support an option for non-resident landowners/operators to hunt deer on their own land.

---

**Anthony Filholm**

**Brookings SD**

**Position:** oppose

**Comment:**

All though some people have genuine wants to hunt the family farms, this would lead to more commercialization of the one resource you cannot control. Private Property. Lets not keep driving down the commercialization of public wildlife road. I feel the current leadership is leaning that way quite a bit. You are not helping bring new hunters into the field. We do not want to be the European model where only the wealthy and privileged can hunt.

# other

---

**Susan Harmon**

**Beaumont TX**

**Position:**

**Comment:**

I am writing as a South Dakota resident and a supporter of Born Free USA to express my opposition to the South Dakota Game, Fish, and Parks Agency's decision to allow the killing of 60 mountain lions (or 40 female mountain lions) in the 2020 hunting season. Mountain lions are primarily hunted for sport and trophy hunting is a cruel and ineffective method of wildlife management, whether it happens overseas or here at home.

Mountain lions play a vital role in ecosystem management, which benefits humans and other animals alike. They primarily prey on deer and elk, which helps manage ungulate populations and deter the spread of illnesses such as chronic wasting disease. The species also preys on other animals, like rodents and rabbits, helping to keep "pest" populations under control, too.

Mountain lions are already under pressure from human population growth and habitat encroachment and trophy hunting will just be one more deadly pressure on this important species.

What is more, a growing number of Americans, including many South Dakotans like myself, are speaking out in opposition to trophy hunting and want laws and policies to reflect these anti-trophy hunting sentiments. In the U.S. House of Representatives, a recently reintroduced bill, the ProTECT Act (H.R. 4804), would amend the Endangered Species Act (ESA) to prohibit taking endangered or threatened species in the United States as a trophy and the importation of any endangered or threatened species as a trophy into the country.

I urge the Agency to reverse this harmful decision and to instead investigate compassionate means of wildlife management, such as translocating mountain lions from areas where their presence is problematic to other, more suitable locations.

---

**Nancy Hilding**

**Black Hawk, SD**

**Position:** oppose

**Comment:**

Nancy Hilding for Prairie Hills Audubon Society

I am attaching a letter saved as a PDF file.

This letter was to have 2 attachments - a HSUS fact sheet and a SD GFP Furbearer report. But it seems you can only attach 1 document at a time to this on-line comment system. So I will do a whole bunch of letters to attach all the attachments to the letters I am sending you tonight. I will send Rachel Gomez copies also, as this is kind of chaotic.

Thanks.

---

**Nancy Hilding**

**Black Hawk, Sd, 57718 SD**

**Position:** oppose

**Comment:**

Nancy Hilding  
President Prairie Hills Audubon Society

I just sent a letter to you that had 2 attachments, but you can only attach 1 document at a time - this is attachment # 1 - a Fact sheet from Humane Society of the US.

---

**Nancy Hilding**

**Black Hawk, Sd, 57718 SD**

**Position:** oppose

**Comment:**

Nancy Hilding.  
I earlier tonight sent a letter for Prairie Hills Audubon Society on the Nest Predator Bounty Program, but you can only attach one document at a time. That letter had 2 attachments. This is the second attachment to that letter. It is the SDGFPP 2017 Furbearer Report. I attach this so the public reading the public comments can compare the NPPB take to a previous years furbearer take.

---

**Nancy Hilding**

**Black Hawk SD**

**Position:** oppose

**Comment:**

Nancy Hilding  
President  
Prairie Hills Audubon Society

To Rachel Comes,

I just tried to send via this system 3 sendings.  
The first was a formal letter and the second two sendings were attachments to the letter. I only got a receipt for one of the attachments and not the original letter. So I sent you the letter and the attachments directly to you by e-mail to try to prove I am trying to use this system. I don't know if they went through, if I did not get a receipt.

# West River Spring Turkey-Use of Rifles

---

**George Vandel**

**Pierre SD**

**Position:** oppose

**Comment:**

I hunt turkey West River - I'm blessed to have developed a landowner relationship lasting over 30 years. I'm am now taking my grandchildren on these hunts. What do I do when I see a pickup stop on a distant ridge and we are huddled up against a tree w/ a turkey decoy in front of us? The latest rifle fad is long range shooting - out to 1,000 yds! Use of these rifles is totally incompatible w/ safe turkey hunting. Please don't put my grandchildren and I in such potential danger!

**Carol Merwin**

343-2786

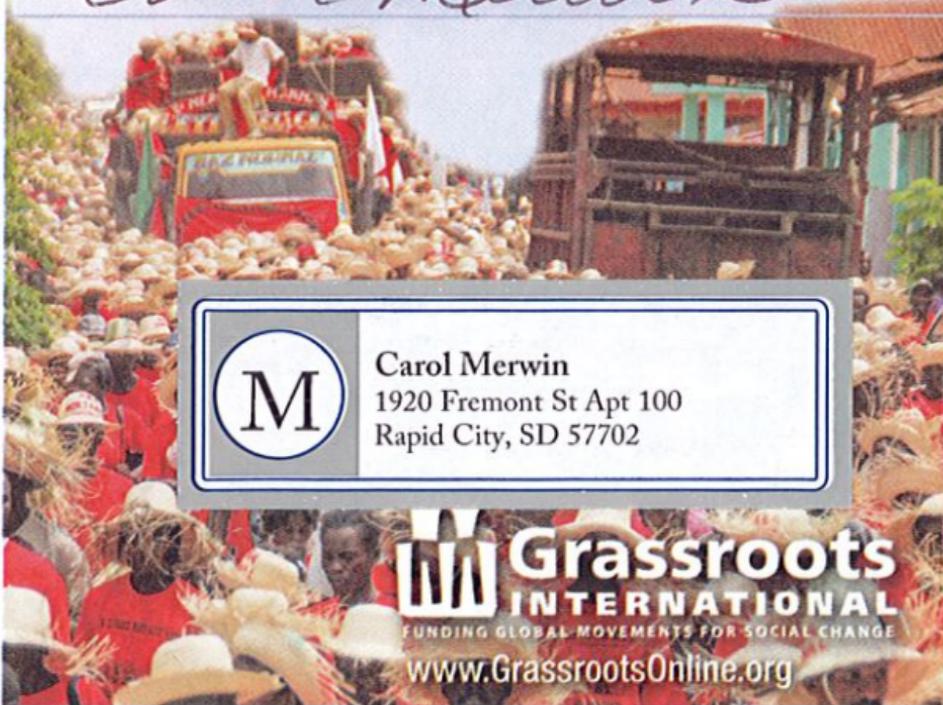
*"Small acts, when multiplied by millions  
of people, can transform the world."*

- Howard Zinn, Grassroots International supporter

*Public Comment*

*I oppose a  
Predator Bounty Pro-  
gram. Those funds  
would be much  
better spent on  
increasing habitat  
for prairie chickens  
and pheasants.*

*Carol Merwin*



M

Carol Merwin  
1920 Fremont St Apt 100  
Rapid City, SD 57702

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S D Game Fish and Parks  
523 E Capitol Ave.,  
Pierre, SD 57501

To Whom This May Concern,

I am writing to comment on your decision to allow killing of 50,000 small predators this spring. These small animals are all native South Dakota species which help to control the small rodent and insect populations in the places they live. The time period which you wish to attack these animals is right during the time when they are raising litters themselves. Each raccoon or fox that you kill may have a litter they are trying to feed. It is wrong to exterminate several native South Dakota species just to save *pheasants* which are **a non-native species**. Small predators have been a useful part of our environment since Europeans first arrived in this area two hundred years ago. It is a serious crime to cause these species that do much environmental good to go extinct just so a bunch of rich hunters can come here in the fall and spend their money.

There is a better solution to this problem. If farmers and ranchers left more of their land to natural species (plants and animals) rather than tilling every acre up in the fall and letting the soil blow all winter with no vegetation for any animals to seek protection in. These same people then plant every inch of this land to corn or beans early in the spring. It's this greed that is causing loss of habitat for small predators as well as game birds. When natural habitat is increased so will the populations of these game birds. As we exterminate these small predators we will see an increase in undesirable small rodents and insects which these small animals help control. What will happen then? Will we have to use more hazardous chemicals to control these pests? We can best help all these species survive by giving them space to live their lives and raise their young in peace. These native species have a purpose in our environment. God did not make them without a purpose. **Stop the extermination of these wonderful animals!**

Sincerely,

Roberta Cosby



210 Schiller St. PO Box 366 Bruce, SD 57220 605-651-9010

PS Please consider the above comments  
before you kill animals!

February 21, 2020

**Mr. Steve Jose  
Chief, Wildlife and Sport Fisheries Restoration Program  
United States Fish and Wildlife Service  
Post Office Box 25486  
Denver Federal Center  
Denver, Colorado 80225**

**Dear Mr. Jose;**

**By means of this correspondence, I wish to notify the U.S. Fish and Wildlife Service, as the administrator of the Federal Aid in Fish and Wildlife Restoration Act of, what I believe to be, an inappropriate and potential misuse (Diversion) of Wildlife and Sport Fisheries Restoration program funds by the State of South Dakota and to request a full and complete inquiry into the circumstances as presented in the following paragraphs of this correspondence.**

**History:**

**On March 1, 2019, The South Dakota Game, Fish and Parks Commission accepted a proposal to promulgate rules to implement a Nest Predator Trapping and Bounty Program that would commence on April 1, 2019 and conclude on August 1, 2019. This program, eventually approved by the Commission and implemented by the SD Department of Game Fish and Parks officials, encumbered over \$950,000 dollars of license money for the purchase and give away free of charge, of 16,000 + live traps to 5,300 program participants and expended \$547,000 in bounty payments for the tails of over 54,000 omnivorous small mammals, (mostly furbearers by management definition) which required a license to trap prior to a change in statute law. There were additional costs to the program totaling over \$200,000 in salaries, benefits and ill-defined miscellaneous expenses. The primary goal of the referenced program was, allegedly, to reduce populations of racoons, skunks, opossums, red fox and badgers in an effort to improve pheasant and duck nesting success on public and private lands in South Dakota. A secondary goal, promoted after the program was operational, was to encourage families to “get outdoors” and recruit children and others into trapping. It is relevant to note that the administrative rules promulgated by the Commission to provide program oversight, exempted participants from paying any licensing fee which was required in South Dakota Codified Law prior to March 11, 2019.**

[http://sdlegislature.gov/Statutes/Codified\\_Laws/DisplayStatute.aspx?Type=Statute&Statute=41-6-23](http://sdlegislature.gov/Statutes/Codified_Laws/DisplayStatute.aspx?Type=Statute&Statute=41-6-23)

A necessary question to be asked in these circumstances is; doesn't Federal Aid in Wildlife Restoration eligibility require the payment of a "reasonable" fee to exercise enumerated privileges?

[https://gfp.sd.gov/UserDocs/nav/2020\\_Bounty\\_Information\\_-\\_Fisk\\_and\\_Robling.pdf](https://gfp.sd.gov/UserDocs/nav/2020_Bounty_Information_-_Fisk_and_Robling.pdf)

This proposal was apparently advanced to the Commission as a part of Governor Kristi Noem's "Second Century Habitat Initiative" which is aimed specifically at increasing and improving pheasant and waterfowl nesting habitat, primarily east of the Missouri River in South Dakota. It is noteworthy that the preponderance of research on the topic of nesting success and recruitment of ground nesting birds indicates that habitat development; not the elimination nest predators or reducing their impacts on nesting, is the most cost effective practice proven to encourage nesting and recruitment success in species such as pheasants, ducks and other ground nesters. SD Game Fish and Parks own historical literature is emphatic on the subject and a recent study conducted by South Dakota State University Students Pauly and White confirm what many have understood for decades. (<https://phys.org/news/2013-10-habitat-key-pheasant.html>)

It is also noteworthy to point out that this "Initiative" was designed and intended to primarily target habitat for the Chinese Ring neck Pheasant and no other species of wildlife in South Dakota. The "Initiative" is popularly understood to be motivated by a significant decline in pheasant populations across the state and the subsequent dramatic drop in non-resident participation in pheasant hunting, non-resident hunting license revenues, ancillary declines in tourism and business revenues and associated sales tax revenues to the State of South Dakota. Were it not for those economic considerations, it is likely that conservation of resources for their intrinsic and civic values would have received little attention. In other words, it appears as though the initiative is more about state economic woes than it is about honest conservation of natural resources for the public benefit.

[https://gfp.sd.gov/userdocs/docs/Nest\\_Predator\\_Bounty\\_Program\\_Terms\\_and\\_Conditions\\_4-2019.pdf](https://gfp.sd.gov/userdocs/docs/Nest_Predator_Bounty_Program_Terms_and_Conditions_4-2019.pdf)

On March 1, 2019, the SD Department of Game, Fish and Parks announced that it would give away, free of charge, 5 live traps, on a first come, first served registration basis to parties interested. A red lettered addendum in the

announcement indicated that due to “overwhelming excitement and participation” in the program, the Department had to limit the trap give away to the first 5,500 applicants and that if participants had registered for 5 traps, they would only be allowed 3. How did they know there was so much excitement when the program hadn’t been fully vetted and authorized by the Commission? Clearly, money had been appropriated and spent for traps before the Commission authorized the expenditure. In addition, the appropriate and lingering question remains; were these expenditures for live traps and bounties specifically mentioned in the Federally approved Grant and Aid applications that apparently under wrote this program? If this program is to be considered legitimate, shouldn’t it be outlined within the parameters of federal grants?

<https://gfp.sd.gov/live-traps/>

Interestingly, in the same announcement, the Department indicated that traps would not be available until after April 1, 2019 and some applicants may have to wait “several months” before receiving the traps. It can be easily concluded, from the public information available, that hunting and fishing license funds had already been obligated to the purchase of traps and in all likely hood, traps had been ordered without budget adjustment or program concurrence by the Game, Fish and Parks Commission as inferred by South Dakota Administrative Rules 1-39-5. The timing, financing and implementation of this alleged “conservation program” is not only suspect but so is the assumption that the program is consistent with long standing goals and objectives of the Department, as well as those written into Long Range Management Plans and those planning documents currently prescribed under Federal Grants and Aid administered by the US. Fish and Wildlife Service under the Pittman-Robertson Act.

Clearly, there was, and still isn’t, any methodology or process available to determine the impacts of this program on the stated goal for which it was intended. The improvement of pheasant nesting success and brood recruitment. GFP officials themselves stated, on at least two occasions, that measurement of success of the program to achieve the program goal of increasing the nesting success of pheasants and ducks was difficult if not impossible. In other words, any effort or process used to measure the effects of removal of 54,000 plus furbearing animals in highly variable locations was, at best, a fool’s errand due entirely to completely unmanageable variability. One would think that if the Department of Game, Fish and Parks was to spend \$1.7 million dollars on a program vigorously opposed by the general public and license buyers who pay the bills, they would want to be able to fully evaluate the cost to benefit of the program to assure their constituents of program success and value to conservation.

What one can conclude, from even casual review of the program tracking information is 1.) The largest number of traps distributed to program participants occurred in localities with the highest density, human populations, 2.) 3 of the counties in the top 5 distribution localities have large urban areas with less suitable area for nesting pheasants, 3.) there is no consistent correlation between the number of traps issued and allegedly used in those areas and the number of tails submitted for bounty payments, 4.) the 2019 Pheasant Brood Survey Report: [https://gfp.sd.gov/userdocs/docs/PBR\\_2019FINAL.pdf](https://gfp.sd.gov/userdocs/docs/PBR_2019FINAL.pdf) tends to show that the top five counties where traps were distributed represent some of the lowest, historical pheasant densities in the State over the past 10 years; and 5.) there is correlation between the number of bounties paid and the number of traps issued by broad location. A significant number of traps were issued in Counties west of the Missouri River that have no pheasants at all and haven't had for decades; Lawrence, Pennington, Custer, and Harding Counties being representative. In other circumstances, fewer traps were issued and bounties claimed in localities where pheasant densities were higher according to the 2019 survey; thusly better defining the variability in determining the success of nest predator removal or even recruiting new trappers in areas where they might be more effective. In other words, the program was poorly directed and came no where close to targeting higher pheasant and waterfowl nest density areas. Loose calculation reveals that over 2200 furbearers were taken in counties with few if any pheasants thereby affirming the stark reality that the program missed its mark entirely while at the same time wasting at least that many animals available for trapping and fur sale during late fall of the year.

The absence of any logical correlation between the number of tails submitted for bounty and the number of traps issued brings into question the number of animals that were actually trapped, euthanized in some fashion, had their tails removed and submitted for bounty. It was pointed out in public hearing by groups and individuals that this program would be defrauded by people submitting the tails from road killed animals, animals killed in unrelated areas and for unrelated reasons and even animals shot or killed in adjoining states. Those concerns were widely born out on social media. From FB postings to street corner remarks, it was apparent that people were stopping along roadways throughout the state, chopping off the tail of a racoon, fox pup, etc. and submitting it for bounty payment. The comment was made by an individual of my acquaintance and confirmed by others, that "I have yet to find a road killed critter that hasn't had the tail chopped off." It should be noted that not only do the number of tails submitted for bounty coincide significantly with human population density but they also coincide with the greatest amount of motor vehicle ownership and use in the state. Indeed, in my own experience traveling on SD's highways between May and August and encountering 7 road killed raccoons and 4 skunks, all of those animals had their tails cut off. It's a fair assumption where those tails wound up. Animals I stopped to look at during

hunting trips to the east of my home in Sept through November revealed several road killed animals with tails still attached. What are the probabilities that 16,000 live traps caught an average of 3.4 nest predators in or adjacent to pheasant nesting habitat in a 5-month period by mostly inexperienced trappers?

Once it became apparent that there was no statistical or scientific dimension available to measure the effects of trapping furbearing animals on pheasant nest success, proponents of the program seized on the secondary selling point. It suddenly became more important, apparently, to “market” the program as an educational opportunity to recruit young children into the outdoors and encourage them to learn how to trap and replenish the dwindling number of recreational trappers in the state than it was to improve pheasant and duck nesting success. The promotion begs the obvious question! If an agency or organization seeks to promote trapping, recruitment of new trappers, and trapper education, isn't it important and equally possible, if not more reasonable, to do so during the regular trapping seasons in late fall and winter when furs are prime and the real purposes, traditions and practices best benefit the trapper and the furbearer resources.

Bluntly, aren't trappers supposed to learn traditional/humane trapping methods, preparation, care and sale of furs to commercial buyers, rather than the immoral removal of furbearers for their tails, that are sold to the government for highly questionable purposes and the unused carcasses discarded in the landfill- or worse yet; left alongside the road, or tossed into the phragmites and cat tails on a GPA or WPA? Is there some value in killing a female adult raccoon or fox, with attendant young, thereby leaving them to either starve or become nuisances and pests in farm yards and urban trash cans? Does the latter practice actually demonstrate any respect for the wildlife that honest conservation mindedness is supposed to instill? Is this program sound conservation education and if it isn't should Pittman Robertson actually cost share it? Comparatively, I don't believe there is another program throughout the country that could legitimately be classified as conservation education. Where can this program be found in the SD Comprehensive Planning and Strategies responsive to 16 USC 669c?

<https://www.law.cornell.edu/uscode/text/16/669d>

The above commentary notwithstanding, I would like to point out yet another issue relevant to this program.

I direct your attention to South Dakota Codified Law 40-36-1 through 40-36-46

<https://www.animallaw.info/statute/sd-predator-control-chapter-40-36-predatory-animal-and-reptile-control#s15>

In consideration of the strict interpretation of this chapter of South Dakota statute law, it seems clear that the South Dakota legislature has reserved for itself, the sole authority to establish bounty policies and payments for wild animals allegedly doing damage as well as any program or effort to “control” what could be referred to as wild animals injurious to livestock, poultry, game, land and the public health. (SDCL 40-36-1) Correspondingly “the Game Fish and Parks Commission may adopt pursuant to chapter 1-26 necessary rules to control foxes, coyotes, feral dogs, prairie dogs, and other wild animals. The expense thereof shall be paid out of the Department of Game, Fish and Parks fund or the state animal damage control fund.”

[http://sdlegislature.gov/Statutes/Codified\\_Laws/DisplayStatute.aspx?Type=Statute&Statute=40-36-1](http://sdlegislature.gov/Statutes/Codified_Laws/DisplayStatute.aspx?Type=Statute&Statute=40-36-1)

It should not go un-noticed that the legislature specifically mentions species of animals that have historic conflict with human endeavor such as foxes, coyotes and feral dogs. It is not therefore, coincidence that furbearing animals such as raccoons, badgers, and even skunks are not specifically mentioned but can be loosely inferred under the terms; “other wild animals” It should also be mentioned in this context, that the State of South Dakota has never “controlled or attempted to control” any other species of wild animal, save for the coyote, under any program in the state’s history. Assuredly, the state has responded professionally or through contract to address individual complaints about these “other wild animals” but those efforts cannot be construed to mean any measure of “population control” as these regulations suggest.

While the Department of Game, Fish and Parks has never published the legal or Statutory justification for this Nest Predator Bounty Program one could conclude, from the rather broad and inclusive language in SDCL 40-36-9, that the statute would authorize the Game, Fish and Parks Commission to promulgate rules establishing this non-traditional, trapping season and its associated logistics, methods and administration. The observation that there seems to be a conflict in law between Codified Titles 40 and 41 authorities of the SD Game, Fish and Parks Commission with regard to the instant Nest Predator/Bounty Program cannot explain its apparent illegality.

**SDCL 40-36-9.**

The Department of Game, Fish and Parks may direct or employ personnel and conduct programs and the Game, Fish and Parks Commission may adopt pursuant to chapter 1-26 necessary rules to control foxes, coyotes, feral dogs, prairie dogs, and other wild animals. The expense thereof shall be paid out of the Department of Game, Fish and Parks fund or the state animal damage

control fund.

I will argue that this statute, in the context of its language, authorizes the Department to employ its own personnel, or perhaps contract with private parties, to be supervised and directed by the Department, to control specific animals or local populations of animals that are injurious to persons or property. Admittedly, the Department does comply with this language. However, it is my sincere belief that this statute cannot be interpreted so broadly so as to authorize the Department to establish a “recreational trapping program” that cannot and did not control any population of animals identified as doing damage or causing harm; particularly to persons, real or personal property or even wildlife resources. By their own admission, SD Game, Fish and Parks sought the unquantified and poorly articulated “reduction” in 5 species of small mammals, on a statewide scale, for two reasons inconsistent with the language of this enabling statute; not any sort of control of those populations in response to valid damage complaints. To suggest, that these five species of animals cause irreparable harm and lasting damage to other wildlife resources to the degree that they require “control” by a loose collection of amateur trappers, acting randomly over a landscape encompassing 77,184 square miles is Pollyannaish.

In reference to SDCL 40-36-15, it is appropriate to point out that the South Dakota legislature intended to be specific in its unilateral intent to establish bounties, the qualifications of individuals to whom bounties were to be paid, the specific animals for which bounties were to be paid. The statute is stated below with operative language highlighted.

40-36-15. Bounties payable for coyotes--Restrictions on payments--Fraud as misdemeanor

The following bounties may be paid from the state animal damage control fund to any resident of this state who possesses a resident small game license or a resident predator/varmint license and who kills, within the boundaries of this state, including parks and monuments, the following animals:

(1) For each adult coyote, five dollars;

(2) For each coyote pup, five dollars.

The Game, Fish and Parks Commission may not approve any bounty claim except during the months of April, May, and June. No bounty payments may be made under this section unless the commission determines that the average price of raw furs in the round for the preceding winter is below five dollars per animal.

Any person who exhibits to a county auditor the skin of an animal which was killed outside of the boundaries of that county, or who patches any skin or part of skin, for the purpose of defrauding the State of South Dakota, in any manner, is guilty of a Class 2 misdemeanor.

When applying the provisions of the above quoted statute, to the substance of the Nest Predator/ Bounty Program inferred through their provisions stated in ARSD 41-8 and SDCL 41-6-23, it seems clear that the Department of Game, Fish and Parks and its Commission erred in several respects.

1. South Dakota Game, Fish and Parks paid bounties for animals not authorized in the above referenced statute;
2. South Dakota Game, Fish and Parks paid bounties from Federal Aid Cost Share funding rather than the State's Animal Damage Control Fund;
3. South Dakota Department of Game, Fish and Parks paid bounties to at least some residents that did not have the prerequisite "small game license or resident predator/varmint licenses as required under this statute;
4. South Dakota Department of Game, Fish and Parks paid bounties to unlicensed individuals who presented tails from raccoons, skunks, foxes, badgers and opossums that are not stipulated specifically in SDCL 40-36-15.

(the operative language "the following animals" strongly demonstrates the legislative intent to specify those animals for which bounties are to be paid. Had the legislature intended that bounties should be paid for such things as raccoons, skunks, opossums, foxes and badgers, it would have so listed them.)

5. The South Dakota Game, Fish and Parks Commission clearly approved bounty claims from people during the months of July, August and likely even September although it can't be determined if claims were paid during that month for animal tails accumulated during months prior to the end of the program on August 31, 2019.
6. With regard to the language in SDCL 41-1-4, it would appear that the Nest Predator Bounty Program conflicts the language and intent of the State's Wanton Waste statute which says;

41-1-4. Wanton waste or destruction of protected birds, animals and fish prohibited--Violation as misdemeanor. No person may wantonly waste or destroy any of the birds, animals, or fish of the kinds protected by the laws of this state. A violation of this section is a Class 2 misdemeanor.

[http://sdlegislature.gov/Statutes/Codified\\_Laws/DisplayStatute.aspx?Type=Statute&Statute=41-1-4](http://sdlegislature.gov/Statutes/Codified_Laws/DisplayStatute.aspx?Type=Statute&Statute=41-1-4)

Is trapping a furbearing animal during a season when the fur is not prime or sellable, chopping off its tail, and discarding the remainder of the carcass

in a landfill or dumping it in open country to decompose, an act of Wanton Waste? I will argue here that it is from the perspective of traditional and ethical trapping that is supported by both science and professional wildlife management. Trappers have always conducted their activities in fall and winter when the pelts of animals are thickest and in prime condition. These “furbearers” are harvested specifically for the market value of their fur and refinement of their glands/body parts for lures and bait. The traditional, ethical trapper, does not simply cut off the tail of the animal taken in his sets but rather skins, cleans and stretches the hides to dry for later sale to a fur buyer in compensation for his work and associated expenses. The animal is properly respected and utilized in the strict ethics of the trapping heritage..... Trapping an animal, cutting off its tail, and discarding the remaining parts of seasonal value can't be considered either ethical trapping nor can it not be considered wanton destruction and wasteful.

I contend that the Department of Game, Fish and Parks negligently disregarded this statute and encouraged people to commit acts that are, at the very least, woefully unethical and/or literally, violative of state statute.

In review of the Eligibility Standards for Wildlife Restoration; 521 FW 1, as published by the US Fish and Wildlife Service, I can find no specific or suggestive language that infers that bounty payments are eligible for reimbursement under either the letter or intent of the language. In 16 USC 669 Chapter 5b §669a; Definitions (1), there appears to be no language which is consistent with payment of bounties as a “tool of conservation” that might warrant cost share reimbursement under the guidelines of the Pittman Robertson Act.

In a further search for clarification on the US Fish and Wildlife Services position on bounty payments or the authorization of payments thereof, I conducted a search and found the following testimony to Congress by Nathaniel P Reed, Assistant Secretary of the Department of the Interior for Fish, Wildlife and Parks in March of 1973 in testimony regarding S.887; A bill to Authorize the Secretary of the Interior to Assist the States in Controlling Damage Caused by predatory and Depredating Animals;

[https://books.google.com/books?id=2bxDQP24\\_VgC&pg=PA48&lpg=PA48&dq=Position+statements+on+wildlife+bounty+payments&source=bl&ots=oGjgn1C0D6&sig=ACfU3U3BvNUf5HKbGz6Hh3ybklhS9pQ8Bw&hl=en&sa=X&ved=2ahUKewj67pCxzobnAhUUUV80KHe\\_JAwkQ6AEwDHoECA0QAQ#v=onepage&q=Position%20statements%20on%20wildlife%20bounty%20payments&f=false](https://books.google.com/books?id=2bxDQP24_VgC&pg=PA48&lpg=PA48&dq=Position+statements+on+wildlife+bounty+payments&source=bl&ots=oGjgn1C0D6&sig=ACfU3U3BvNUf5HKbGz6Hh3ybklhS9pQ8Bw&hl=en&sa=X&ved=2ahUKewj67pCxzobnAhUUUV80KHe_JAwkQ6AEwDHoECA0QAQ#v=onepage&q=Position%20statements%20on%20wildlife%20bounty%20payments&f=false)

During the Hearing Before the Subcommittee on the Environment of the Committee on Commerce 93<sup>rd</sup> Congress 1<sup>st</sup> Session Mr. Reed states the following on page 48;

**“Many methods have been used to cope with predatory and depredating animals, including the payment of bounties. The bounty system is not an effective method of control. The Federal Government does not support bounty payments. This position is also maintained by most State Fish and Wildlife Agencies. Other control methods used over the years – with varying degrees of success – including shooting, denning, trapping, snaring and poisoning.”**

The testimony above does not appear to be antagonistic to the referenced Act passed by Congress although one could consider it a bit dated. The testimony of Mr. Reed notwithstanding, I could find no other reference to Federal policy that supports or rejects bounty payments as a viable alternative to wildlife damage management.

Gentlemen; I submit that there are several inconsistencies in the nest predator bounty program that depart from 521 FW 1 Eligibility Standards for Wildlife Restoration.

Specifically, 521 FW 1 Eligibility Standards 1.8 Sections B and C. seem to apply appropriately to the purchase of live traps to be given away, free of charge, to program participants. Section C declares ineligible for federal aid; *“Providing services or property of material value to individuals or groups for commercial purposes or to benefit such individuals or groups [50 CFR 80.5(a)(1), 50 CFR 80.14(c). This does not prohibit providing technical assistance to a private landowner or operator where a public benefit will be served. [50 CFR 80.5(a)(1)] (see 522 FW 14).*

Isn't providing up to 3 live traps each to 5300 people free of charge; “providing property of material value to individuals for commercial purposes when those individuals can deploy those traps during regular trapping seasons in future years to engage the commercial market for furs?

More specifically; the Eligibility Standards in 521 FW 1; 1.8 H subsection (1) specifically excludes wildlife damage management activities except under a variety of conditions. I contend that Subsection 1(d) of the excepted standards is operative in these circumstances... The SD Department of Game, Fish and Parks held this “Nest Predator Bounty Program” out to be a defacto wildlife damage issue on the premise that nest predator control was essential to improve pheasant and duck recruitment in the State. I can find no data or

information that would quantify or even qualify the notion conclusively. Factually, the Department of Game, Fish and Parks Wildlife Damage Management section supervisor acknowledged that the results of the program could not be quantified or qualified. The entire program was not based on well established wildlife conservation and science. I contend that it was based entirely on long since debunked social gossip promoted by political machinery more interested in image than conservation of wildlife. As such, it can't possibly be an "eligible activity in the Wildlife Restoration Program."

521 FW 1; 1.8 H subsection (1) d.

(d.) The primary purpose of the wildlife damage manage activity is not an eligible activity in the "Wildlife Restoration Program"

**Further, 521 FW 1; 1.8 H. subsection (2) states:** If conditions (a), (b),(c),or (d) apply, a State fish and wildlife agency may still use Federal Aid funds to monitor wildlife damage and provided technical guidance, exclusive of actual management activities, if the Federal Aid grant documents approves the activity. Payments for wildlife damages are not an eligible use of Federal Aid funds.

Since it's inception, this "Nest Predator Bounty Program" has been publicly promoted as a recreational endeavor to allegedly control predatory damage to two wildlife species. In this professional's opinion, such a measure cannot be married to any thought of traditional wildlife conservation. Nest predation is, apparently, held out to qualify under the provisions of SDCL 40-36-9. The previously mentioned program is neither wildlife damage monitoring nor is it technical guidance; (although there was trapping education and technical training provided to interested persons by Department Staff) and there has been no record shown to demonstrate that the activity was approved in Federal Aid grant documents.

**Finally; 521 FW 1; 1.10 subsection B states:** Even if one or more of the conditions in subparagraph A apply, State fish and wildlife agencies would not be in diversion if they use license fees to provide technical guidance, consultation, permitting, and monitoring of wildlife damage, exclusive of actual management activities such as "removal of animals." (quotation marks added for emphasis) We allow the use of fees for control of exotic species not under authority of the State fish and wildlife agency if necessary, to restore or maintain populations of species under the State agency's authority.

**It can easily be inferred from the above subsection of 521 that South Dakota Game, Fish and Parks maintained no provision of technical guidance, consultation, permitting or monitoring of wildlife damage but rather, actively promoted management activities involving the removal of animals that are indigenous to the state, to the detriment of those species, rather than any exotic species referred to in the subsection. It cannot be said, with any certainty, that there was necessity to restore or maintain the pheasant or duck populations under the State agency's authority; largely because it has historically been shown, without equivocation, that populations of pheasants, ducks and other wildlife tend to restore themselves when proper conservation strategies are implemented and homes for them are restored.**

**It should be noted that ducks and migratory waterfowl are not under the authority of the SD Department of Game, Fish and Parks but rather are regulated by the Federal Agency that also oversees the administration Pittman Robertson Wildlife Restoration Act funding. Claims were made by SD Game, Fish and Parks that "duck populations would also benefit from this program. I'm aware of only one experiment in SD involving professional removal of nest predators and electric fencing, done on Lake Albert in Hamlin County, SD that could apply in some loose measure to these claims.**

**How can this Nest Predator/Bounty Program be classified, in any circumstance, to be a viable and effective wildlife conservation effort deserving of Federal Aid Funding?**

**I defer to one of the 7 Sisters of the North American Model of Wildlife Conservation; which the outdoorsmen/women of SD and the SD Department of Game, Fish and Parks used to endorse, to address the ethics and morality of this Program!**

**Wildlife can only be taken for "legitimate" purposes.**

**Above all, hunters must utilize the meat they harvest. The ethical reasoning speaks for itself, and most states have wanton waste laws on the books. We have an obligation to do everything in our power to waste as little of that animal as possible. Respect the resource, respect the land, and respect the life that was taken.**

**Does this program promote the taking of wildlife for legitimate purposes?  
Does this program promote the avoidance of waste and ravage of wildlife?  
Does this program promote respect for the resource, the land and the lives given?**

**Wildlife resources must be managed on scientific, not emotional basis**

**Perhaps the most important tenet, this stipulates that wildlife management and policy must be based on sound scientific evidence. Special interests and emotional/sentimental arguments are not grounds for consideration. Policy and practices must serve the best interests of the ecosystem, while taking into account the needs of the various stakeholders. A scientific basis also ensures that the management plan is adaptable as conditions change and as new data and research emerges. This directly influences hunting and fishing seasons, bag limits, manner of taking, and other regulations.**

**Unfortunately, though it is the most important, this is perhaps the least respected tenet. Whether through the naivete of the misinformed, or the greed of industry, conservation's pure roots are corrupted. We see this all the time in legislation that is driven by public outcry instead of hard science and balanced management.**

**I submit, gentlemen, that this Nest Predator/Bounty Program is an egregious and offensive affront to the above sisters of the North American Model and a corrupting political stunt that has no value to wildlife, the trapper, or the outdoor heritage that is rapidly losing credibility and civic favor. A return to science driven management is essential; right along with compliance with historical law, precedent and soundly vetted public policy.**

**In closing, I'd like to broach one more topic which I believe deserves more attention from Pittman-Robertson/Dingell Johnson Act administrators in the US Fish and Wildlife Service.**

**For many years; The State of South Dakota has implemented and maintained various programs of private land hunting access throughout the state. The State programs, cost shared under PR guidelines, contract with willing property owners to open parcels of private land to hunting, trapping, fishing etc. to the public without individual requisite permission from the landowner/lessor in the majority of circumstances. Specialized programs, such as the "Controlled Hunting Access Program" have differing management and regulatory guidelines but the fundamental theme is the same. Leasing land for public access.**

**The concern in many circumstances, with regard to these areas is the value of their contribution to wildlife conservation, wildlife's intrinsic value and the hunting heritage. Perhaps the best way to describe the concern is to point out the diversity of rental payments made to private landowners. In response to the question; "How much do farmers and ranchers get paid to put their land in the Walk-In-Area program?" – one can find the following response in the 2019**

## **WIA Guidebook.**

*“A. Annual payments range from \$.53 to \$10.00 per acre and are determined by numerous factors including amount and type of hunting opportunity, size of the area, habitat conditions, anticipated hunting use, and if it unlocks inaccessible public land. Land that contains CRP or similar habitat in high pheasant density areas or near Sioux Falls receives the highest payment rates.”*

**Does anyone else beside me see the absurd disparity, in this policy. Does anyone beside me see the fiscal impacts of this policy. Does anyone beside me question the comprehensive value of these rental expenditures to wildlife and the hunter? Has anyone, beside me, questioned the cost to benefit to wildlife conservation of these federally supported expenditures.**

**I.e. If the state contracts with a land owner to open 100 acres of land enrolled in CRP for an annual payment of \$1000.00 and at the same time contracts with another landowner for access to an 1,800 acre pasture that has been grazed flat for a decade, which parcel has appropriate value to both wildlife conservation and the hunting heritage? I've seen and hunted in both. One with a fair measure of satisfaction. In the other, complete disgust. Many others share these same feelings and emotions. If we're paying for something, shouldn't we expect good to high quality products for our money?**

**What is the honest purpose and objective of this program? Shouldn't money expressly set aside for Wildlife Conservation purposes be spent with better specifications, criteria, quality control and thriftiness. Shouldn't the criteria for leasing these private lands be a great deal more favorable to wildlife and its production; which is the goal stated in 521 FW 1 1.7 A.**

*521 FW 1; 1.7 A. (eligible grant purposes) Restoration, conservation, management, and enhancement of wild birds, and wild mammals, and provide for public use and benefit from these resources [WR Act Sec 2 and 50 CFR 80.5 (a)(1)].*

**I have, in past years, observed numerous WIA enrolled acreages that haven't been fit enough to raise a meadow vole much less find any huntable species of wildlife on them either during the fall and winter nor during the growing season. I have photos of a WIA that was literally a quarter section of wind-blown dirt with a dry stream bed and a few trees crossing one corner of the property. A lone corn stalk or two could be seen sticking out of the eroded soil in the middle of the field. Even the WIA sign posts at the corners of the field were partially covered with drifts of wind-blown soil. I have photos of a severely abused and overgrazed 600-acre pasture, with a periodically**

poisoned 2-5 acre prairie dog colony that couldn't produce any wildlife at all. What few hunters I've seen try to hunt on the property have quickly decided that their efforts are a waste of time and quickly leave. In 15 years, I've never seen a hunter take a game bird or animal from the property. Yet it's rented every year. Many of us have heard excuses such as; "if the state doesn't lease it, it will be leased to a private party and hunting access will be lost." "If the state doesn't lease it, then access to adjoining property won't be available". If there is no wildlife on the property, or it doesn't ever raise any, why would there be any hunting opportunity on it? The reasoning is lame at best.

These highly questionable areas are scattered all across South Dakota and one has to ask the question; "why are we spending money on these acreages when they have no value to wildlife conservation/wildlife production nor do they contribute anything to hunter success or enjoyment.

It is my contention that these hunting access programs need much better oversight and quality control criteria to assure their benefits to wildlife and the hunting heritage. Certainly, there are lands and landowners that are genuine stewards of their lands, wildlife and considerate of the hunting heritage that deserve the rental fees paid. There are, however, abundant lands, paid for with hunting license and PR dollars that are valueless to wildlife and the hunter. I contend that paying property owners for hunting access to these basic, biological deserts, amounts to nothing more than rewarding them for bad land stewardship. Even the USDA doesn't do that! I would hope that the US Fish and Wildlife Service would seek ways to assert better quality control in these programs and greater accountability for grant funding expenditures.

Thank you for indulging this lengthy correspondence. The courtesy of a response would be very much appreciated.

John Wrede

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(605) 718-0762  
[jmw225@midco.net](mailto:jmw225@midco.net)

cc: South Dakota Game, Fish and Parks Commission



27 Feb 2020

To the SDGFP and SDGFP Commissioners

My name is John Hopple and I am the President of the South Dakota Trappers Association. I am writing this to the board for them to consider as they discuss the 2020 Bounty Program. I do apologize for not being there in person however I am currently traveling out of state.

On Feb 19, 2020 the Directors of the South Dakota Trappers Association held a telephone conference meeting. One item we discussed was the 2020 bounty program. As the outdoor organization who is most closely associated with this program (along with the Western South Dakota Fur Harvesters) we feel it is import to provide our inputs. First and foremost we feel this is a SDGFP program to manage. As other programs such as fish stocking or depredation concerns, it is the departments inherent right to establish this program and run it as they see the best way forward in obtaining the goals of the program.

As in 2019, we were not asked for inputs or consulted on how the bounty program should be run for 2020. We will however as we did last year, support the GFP 100% in assisting in as much educational information and training as possible for a successful and safe program to be properly implemented. This is in line with our By-Laws on file with the Sec of State, Article 1 (g) which states "to promote a program of continuing education". We believe this program no matter how it is set up and what restriction, rules or boundaries are on it can become a program of education. We have already proven that fact last year.

The SDTA was at the forefront of proper trapping education for the 2019 Bounty Program. No less than 3 full classes were taught to members of the public who wished to participate at the Outdoor Campus West. A wide variety of techniques and proper equipment use was made available. One item that stood out to us was that entire families took these classes together. A goal of this program was that and we can verify it became a reality. We have already committed to teach two more classes at the Outdoor Campus West in March of 2020 and will teach as many as GFP would like anywhere in the state.

Our goal is to see new trappers young and old alike enjoy the sport and do it properly. The bounty program gives families a chance to participate as a family unit. Children not in school and long summer days are a perfect blend for this to happen. Often it is hard to get a kid excited to be outdoors when it is cold or wet and snowing. The bounty program can be a bridge to the outdoors most would have not ventured into. It is only natural to assume other activities such as hiking, fishing, hunting and camping will follow next. We will never believe everyone who does this program will be trappers forever. But we want to ensure for the time they do participate they understand laws, ethics and utilize proper and safe techniques. This program can be a win-win for all involved.

Thank You for your time and consideration in this matter.

John Hopple, Black Hawk, SD  
President, South Dakota Trappers Association

February 29, 2020

To: South Dakota Game, Fish & Parks Commission

Dear Commissioners:

I am writing to express my concern and disappointment related to the continuation of the Nest Predator Bounty Program. Even though the cost of the program has been substantially reduced, my belief is that a significant amount of sportsman's dollars will be wasted. Yes, polling by the GF&P showed a majority of public supports a bounty program. I think we are all aware the majority of the public does not pay for the program, and for that matter, public opinion is not always based on science and established biological facts.

To date, the cost of the program, including oversight of the program, providing free live traps, meeting with trappers who have tails to turn in, filling out the electronic affidavits, submission of bounty forms, storage of tails, preparing reports, sending out checks, paying for polling and other expenditures is approaching two million dollars. This is money that could have improved habitat on a thousands of acres of public land, or used to purchase lands for the benefit of future generations in perpetuity. Instead, this money is gone, and more manpower and money may be expended on a short-term solution to a long-term problem. What is worse is the solution is not a solution at all. NO studies have shown that predator control on a random basis over a widespread area will successfully increase the survival of nesting hens and eggs. However, innumerable truly scientific studies have repeatedly shown that when suitable habitat is available and weather conditions are decent, pheasant populations can flourish without direct predator control.

It does seem the stated intent of the program is changing from predator control to introducing children to trapping. If that is in fact the case and the program goes forward, perhaps GF&P should consider only allowing payments to persons under the age of 18.

The sportsmen of this state have strongly supported our wildlife management system and have come to expect the GF&P Commission to make wise, scientifically sound decisions concerning our valuable natural resources. My hope is you continue to do so, and I thank the Commission for your time, service, and consideration of our concerns.

*Bill*

Bill Antonides  
Retired Wildlife Conservation Officer  
Certified Wildlife Biologist®  
514 North Arch Street  
Aberdeen, SD 57401-2951

Phone 605-380-8586  
[billantonides@abe.midco.net](mailto:billantonides@abe.midco.net)

CC: GFP Secretary Kelly Hepler

## Nest Predator Bounty Program Comment

Submitted by

Donna M. Fisher

12311 White Tail Road

Deadwood, SD 57732

dmfisher@wildblue.net

### I. Pheasant industry interests should not be allowed to dominate management of our native ecosystems or our outdoor youth education programs.

Pheasant numbers have declined with the loss of habitat. From 2007-17, Conservation Reserve Program acreage was reduced 37 percent statewide, with some counties in western South Dakota seeing reductions of more than 75 percent. A study published by the South Dakota State University Extension Service in 2014 found that between 2006 and 2012, South Dakota lost 1.84 million acres of grassland primarily to corn and soybean production.

Developing the Nest Predator Bounty Program, cloaked in a youth outdoors promotion, is an expensive solution for the wrong problem. If Game, Fish and Parks must spend tax dollars to promote pheasant production, then spend those dollars protecting grasslands and habitat.

Most of South Dakota's youth population lives in the metropolitan corridors on either end of our state. The youth who live on eastern farms or western ranches don't need my tax dollars to promote a love of the outdoors. However, picture today's suburban families dealing with the trauma of their child's encounter with a dead or wounded and potentially dangerous animal badger or coyote.

Bounties are no incentive for spending time outdoors. I grew up on a farm and trapped for pocket gophers for spending money—pretty boring work after first week or two! Five dollars for fox tail is unlikely to motivate love of the outdoors given the work involved.

### II. Trapping so-called nest predators should be handled by licensed professional trappers.

Humane trapping by skilled adults can manage nest predators and avoid the collateral damage of indiscriminate killing that upsets nature's balance. According to Pheasants Unlimited, poorly-managed programs of predator eradication trigger increased birth rate of predators. The resulting population of young animals causes more random damage to nesting birds.

### III. Who developed this nesting predators list? Please consult wildlife experts.

Raccoons and coyotes are plentiful, but their unmanaged eradication may upset an ecosystem's balance.

Opossums are tick-eating machines, a quality that's particularly beneficial in areas like ours where Lyme disease is a real danger. Beyond their effectiveness at eradicating

ticks, they contribute to healthy environments, catching and eating cockroaches, rats and mice. They consume road kill and dead animals of all types. Take them off the list, please.

Badgers are candidates for removal from the bounty list, too. Their normal prey of voles, mice, rats and prairie dogs win them friendship from grain farmers. Their burrowing habits enhance long-term soil quality.

Foxes may plunder pheasant nesting populations, but their effectiveness in controlling voles, ground squirrels, rabbits and other small mammals makes them more valuable to the larger ecosystem picture. Please remove badgers and foxes from the list and leave selective trapping to professionals when necessary.

**Recommendation:** Please derail these unwise uses of my tax dollars; use them to provide genuine incentives for pheasant habitat protection and development and training of professional trappers.

To: Game Fish and Parks Commission

From: Tyler Spomer, Bismarck, ND

Re: Petition to establish an East River special Any Whitetail Deer License

Date: January 8, 2020

My wife and I were both born and raised in South Dakota and lived there our entire lives until we recently moved with our three daughters to Bismarck, ND. We still spend a significant amount of time in South Dakota as my wife manages the day to day operations of her family's cow/calf operation. The family farm is located on 1600 acres of land in Campbell County. The farmland is rented out. However, we do put up grass, alfalfa, and millet hay. Most of it is used for feed for our own cattle, with the remainder sold to other area farmers.

My wife and I spend time each year helping put up hay, managing the cow/calf herd, and overall farm management.

The farm has a direct economic impact on the local and state economy. Calves are sold at the local sale barn. Corn and soybeans are sold at the local elevator. Farm supplies and equipment purchases are made in town.

We've hunted the farm for many years. The last few years have been special as one of our daughters has taken an interest in hunting. We want to continue hunt deer on the family farm. However, the only member of our family eligible for a rifle tag is our daughter. My wife and I are not able to hunt deer with a rifle. We have no interest in hunting other private or public ground. Not once in all the years we've had Campbell County deer tags have we hunted other land. We've always hunted our farm as there was no reason to hunt other land.

The Proposal, as submitted, does offer an option for us to hunt. However, it comes at a high cost. A deer tag costing \$554 is too expensive. We can't afford to spend that kind of money for a deer tag. The regular non-resident deer tag cost of \$286 is more reasonable.

Overall, I object to the proposal as written. However, an option should be available for non-resident landowners/operators to obtain a rifle deer tag for their own land. This tag should not be transferrable.



SOUTH DAKOTA  
DIVISION

# The Izaak Walton League of America

DEFENDERS OF SOIL, AIR, WOODS, WATERS, AND WILDLIFE

February 28, 2020

South Dakota Game, Fish and Parks Commission  
523 East Capital Avenue  
Pierre, SD 57501

Dear Commissioners,

During their meeting in Pierre on February 1 the Directors of the South Dakota Division of the Izaak Walton League of America (Division) unanimously adopted a resolution in opposition to South Dakota Department of Game Fish and Parks endorsing, promoting or adopting any bounty programs that utilize expenditures of sportsmen or state funds.

While addressing the Legislature earlier this year Governor Noem announced that according to a recent survey the 2019 Predator Bounty Program was an overwhelming success. She indicated it is her intent to conduct the program again in 2020.

The Division would like to point out that the success the Governor referred was based on responses from participating trappers who received payment(s) for each fox, possum, badger, skunk or coon tail turned into the department. The survey results in no way represent any biological or scientific benefit of improved nesting success resulting from the elimination of 50,000 predators at the State's expenditure of \$500,000 and a total cost of the program at over \$1.7 million.

Based on the square miles of land in South Dakota, trapping 50,000 predators reduced the state's predator population by less than 1 animal for every 1,000 acres of land. The benefit of that minor a reduction towards improved nesting success is statically insignificant.

We support the provision that shortens the timeline. In 2019 bounties were paid into August. That was 2 to 3 months past the primary nesting season, and beyond the ability of predators to impact nest success. We suspect many of the tails turned in may have come from road kills, with some not even from South Dakota. As implemented, this program had no way to verify this, but there must be a reason why most of the road killed predators, observed by our members in South Dakota last year, had no tails. Furthermore, we believe that many of the predators turned in would have otherwise been trapped or shot with or without a state sponsored bounty program.

Bounty and nest predator trapping programs have been studied for years. It's widely known that trapping of predators must be conducted in a highly intensive manner to be effective. This must be done to consistently reduce the population below that animal's normal mortality rate, to achieve the desired results.

The Division strongly supports programs that encourage residents, especially our youth, to get engaged in outdoor activities including hunting and trapping. We would eagerly support programs that encourage and engage youth in the benefits that an intensive predator control and improved nesting program could achieve in areas of the state.

However, we do not support programs that give our youth a false perspective of bounty programs or the idea that they should expect to be paid to do what is simply “the right thing”. We also believe that the use of sportsmen’s dollars toward another nest predator bounty program is a violation of the public trust.

The South Dakota Division of the Izaak Walton League of America respectfully requests that the South Dakota Game, Fish and Parks Commission not authorize the use of any funds from the Department of Game, Fish and Parks for the Nest Predator Program in 2020.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in cursive script that reads "Kelly Kistner".

Kelly Kistner

National IWLA President and President of the South Dakota Division of the IWLA  
603 Lakeshore Drive  
McCook Lake, SD 57049  
605-232-2030 (H) – 712-490-1726 (C)  
[iwlasdpresident@outlook.com](mailto:iwlasdpresident@outlook.com)

February 25, 2020

Game, Fish & Parks Commission,

I am writing to share my views on the South Dakota Nest Predator Bounty Program initiated in 2019. My address is Hendricks, MN, but I live in South Dakota and am a South Dakota resident. I have been involved with South Dakota wildlife issues for most of my life. I worked as a biological technician and wildlife biologist for the U. S. Fish & Wildlife Service for over 38 years at Sand Lake National Wildlife Refuge. Much of my career involved working with and coordinating with Game, Fish & Parks personnel and the public.

I could tell from the start that there was “something different” about the bounty program. There were no public meetings or requests for input for a program that was sure to be controversial. Out of the blue, traps were being given away and the state was starting a bounty program, a practice that had been abandoned by the Game, Fish & Parks many years ago. License dollars were being used to fund a questionable program.

One of the primary goals of the program was to enhance nest success. My experience has shown that predator control can work with extensive trapping on relatively small areas that have limited predator access, but trapping over a large landscape has little chance of significantly increasing nest success. Other predators move in to take the place of those that are removed. If this program continues, some nest success research should be done to measure the program’s impact.

During the first season of the program, I heard conversations in the community of predator tails being collected and given to local teen-agers to turn in. Local landowners were doing most of the trapping/killing. Although road kills were not eligible to be included, every road kill I stopped and checked during the program did not have a tail. That includes road killed raccoons on Minnesota roads near the South Dakota border.

Our community also observed the disrespect of our wildlife resources with tailless carcasses thrown in the ditch & propped up in trees for all to see. (Figure 1-3) It seems the value of these wildlife species is minimized by the apparent “need” to kill them.

I read the “South Dakota Residents & Participants Perceptions of the South Dakota Nest Predator Bounty Program”. My first thought was just how much did this evaluation cost the sportsmen of South Dakota? I’d like to know what was paid for this evaluation. The survey indicated that 62% of South Dakota residents contacted were not aware of the program before they were contacted! That tells me the Game, Fish & Parks did a terrible job of introducing the program, as I referenced earlier in my letter. It also indicates why so many of these contacts approved of the program. They knew nothing about it, except as explained on the phone by the surveyors. With 62% of the only 418 residents contacted knowing nothing of the program, it is no surprise to me that the program was approved of in the survey. I believe that if more of those contacted had an avid interest in the South Dakota outdoors, your approval rating would drop drastically. The survey

also showed 91% of the participants approved of the program which would only make sense since they received monetary benefits. The information gathered by this study has little value in determining “real support” for this program. The license holders who have a stake and interest in this issue should be have been contacted for their opinions.

I do have several questions about the proposed 2020 program: (1) One of the goals of last year’s program was to cultivate more interest in trapping as a family event. This year, shooting is being added to the killing methods. Why is shooting predators included in this year’s proposed program? (2) One of the goals of this year’s program is to double participation in ETHICS SD. What is ETHICS SD? I cannot find anything about that on the GF&P website or in other GF&P literature.

In summary, I believe the Game, Fish & Parks Department lost a lot of credibility by initiating this program. Spending \$500,000 on a new program with no input from the sportsmen who buy the licenses was a mistake. I do not want my license fees used for this program. It should not be continued.

William A. Schultze  
Hendricks, MN



Figure 1. Tailless carcasses from the Nest Predator Bounty Program, April 21, 2019, Brookings County, SD.



Figure 2. Tailless raccoon carcass thrown in tree in road right-of-way, April 21, 2019, Brookings County, SD.



Figure 3. Tailless raccoon carcass propped up in tree in road right-of-way, April 21, 2019, Brookings County, SD.

Dear SDGFP Commissioners,

I have put a great deal of thought into this proposal. It has me torn on a few issues. After deep consideration of this proposal I have to oppose it for a few reasons.

I have quite a few family members and friends that are landowners. I understand wanting to give landowners the opportunity to increase income on their properties. It's not always easy to turn a profit in agriculture, especially for a small farmer. Allowing non-residents to draw Special Buck licenses would open up another avenue for these landowners to make some money by charging a fee to the non-resident hunter. My concern is what the unintended consequences might be.

Paid hunting operations are becoming more prevalent each year. My family has hunted in Perkins County for a number of years. There are two different ranches that we used to hunt on, but we are no longer able to. Both of those ranches have moved towards paid hunting. It's hard to blame them for wanting to make a little more money off of their land. At the same time, we have lost all of the private land that we used to have access to. Now, we hunt public land exclusively.

Thankfully, there's an abundance a public land in the western half of the state. However, there is not an abundance of public land in the eastern half of the state. While, in theory, these new special buck licenses for non-residents will not directly affect hunting pressure on public land, I feel there could be a secondary effect that increases pressure on those public lands.

Currently we have a neighboring landowner that gives us permission to hunt deer during the ERD season. He also gives other people permission to hunt on the same ground and some of his other pieces of ground. He probably gives access to 8-10 people. If he chooses to take on a non-resident hunter at \$5,000 for rifle season, it would displace all of us. One special buck license for a non-resident could displace 8 to 10 resident hunters.

If this happened to us we would only have so many options. Hopefully we would be able to find another chunk of private land to hunt. However, that's getting harder and harder to do. If we weren't able to find more private land to hunt, we would be pushed onto public land. As I stated, we currently hunt public land in Perkins County. There is a great deal more public land out there and there are still a lot of people on it. I know the non-residents won't be hunting the public ground, but the resident hunters that get displaced from private ground will have to go somewhere. I could see this greatly impacting the hunting pressure on public land.

Undoubtedly, some people will find all of this too much of a headache and quit hunting all together. They either won't be able to find a place to hunt or the public land they do find will be overrun by other hunters. Most people can't compete with \$5,000 to hunt deer. And sometimes the public areas are too crowded to hunt. If you can't afford to hunt and you don't have another place to go, you are pretty much done hunting.

This would be in complete opposition to your goal of increasing hunter recruitment and retention.

I know that part of the reasoning for this proposal was to make licenses available to non-resident landowners. I think that non-resident landowners should have access to hunt their own ground. As it is,

they already have access. In fact, every non-resident has access to hunt deer in our state through archery licenses.

I understand that the non-resident landowners may not want to hunt with archery equipment. They may want to use a rifle to hunt their own ground.

I don't want to oppose this proposal without offering a different option.

I think a better option than this proposal would be to allow non-resident landowners to get a landowner license for their own ground. I think it would be fair for them to get a license as long as they own at least 160 acres. If they want to have other family members/landowners hunt they need to have at least another 160 acres for each additional landowner tag that they wish to acquire.

If letting the general public of non-residents get licenses is the goal instead of just non-resident landowners then I have a solution I think would be better than the special buck proposal.

There were around 30,000 East River deer licenses last year. 500 tags is about 1.7% of that total. We could open up 2% of all East River anydeer licenses and 2% of East River antlerless tags within each county to non-resident deer licenses. There could be a minimum cap of at least two licenses for non-residents within each county for both anydeer and antlerless deer. Half of the licenses allocated for non-residents would be open to landowner preference first. For example if there were 100 anydeer tags and 100 antlerless tags available within a certain county, then 2 anydeer tags and 2 antlerless tags would be set aside for non-residents. Of those tags ½ would be set aside first for non-resident landowners. So 1 anydeer tag and 1 antlerless tag would be open to non-resident landowner preference. After that the remaining licenses of the 2% would be open to general non-resident applications. The tags would be valid on public and private ground within the county for which they apply. The fee could still be set at \$554.

This model would do many things.

It may slow the growth of paid hunting operations. Widespread paid hunting is on the way, but this may slow it more than the proposal in front of you.

It would create an opportunity for non-resident landowners to receive licenses.

It would also allow non-residents who do not own land to get licenses and have the option to hunt public land. This way, someone who could afford to pay for the license but cannot afford to pay \$5,000 for a hunting fee on private ground would still be able to hunt. Even if all of the non-resident hunters (2%) were to hunt on public ground it would not overpopulate those areas because they would be spread out amongst all of the East River counties.

If non-residents had the option to hunt public ground they would not displace resident hunters from private ground.

It may increase the possibility of non-resident hunter recruitment as well. If the non-residents can hunt public and bypass the big money of a paid hunt, they may apply for a license for their kids.

On the other hand, the non-residents that want to pay for a hunt with a guide would still be able to.

Finally if you keep the fee at \$554 the state would still make the same amount of money if not slightly more considering the licenses would account for 2% of the total instead of only 1.7%.

If, you as a commission, still plan to approve this proposal, I believe that all of the money generated through these special buck licenses needs to go towards public land acquisition or to provide huntable deer habitat on existing public lands in the eastern half of the state. This money should go towards buying public land. It should go towards acquiring walk-in areas with existing deer habitat. It should go towards building huntable deer habitat on existing public lands. I don't think the money should go towards any pheasant hunting habitat. There are plenty of areas that are good for pheasant hunting. There aren't nearly enough public hunting areas for deer. We need places to put tree stands and hunting blinds, not just grass and shrub belts.

I hope my comments are helpful and I would gladly speak more at length with anyone whom is interested.

Thank you.

Sincerely,

Josh Hagemann

Mission Hill, SD