

## APPENDIX 1. WHY OPPOSE THE NEST PREDATOR BOUNTY PROGRAM? – 2025

### • Financial aspect

- The Nest Predator Bounty Program (NPBP) does not stimulate economic activity, such as meat or fur production. Killed animals are simply buried in the ground without a measurable increase in tax revenue or economic benefit.
- In the sixth year of the NPBP implementation, [GFP confirmed](#)\* that there is no data to show the program has increased the state's ground nesting bird's population. If NPBP is not achieving its goals, why does it continue to be funded, while other states have discontinued bounty programs due to ineffectiveness (e.g., in [Missouri](#), [Georgia](#), [Kansas](#), [North Dakota & Nebraska](#), [Montana & Colorado](#) , ...)?
- Nature abhors a vacuum, and the vacant niche is filled by migration from adjacent sites or by another species with more aggressive compensatory reproduction mechanisms, thus wasting millions of dollars spent on the NPBP.
- The NPBP diverts funding from effective conservation initiatives, such as habitat restoration projects that actually do provide a return on the investment.
- Habitat improvements can be cost shared at a rate of 50% to over 75% through a variety of programs. GFP receives 75% cost share on habitat purchases and improvements through Pittman Robertson funds.
- Predator management programs can be successful in specific situations, particularly when they are focused on small or isolated areas (e.g., islands), carried out with extreme intensity and on an annual basis, or using of non-lethal methods [examples: [1](#), [2](#), [3](#)]. NPBP funds might be enough to cover a smaller subset of the state, but certainly not enough for the entire state, which makes the impact too diffuse. A letter from [Larry Fredrickson](#) (former Pheasant Research Biologist and State Furbearer Biologist (1960-1996)) explains, with history of predator control efforts in SD.

### • Lack of support

- In 2019 Remington Research Group conducted a social survey of South Dakota residents regarding the NPBP and showed that a minority of South Dakota residents (37%) approve of trapping in general and only [26% of residents approved of the NPBP](#).
- GFP received >600 of public comments on the NPBP, ≈90% of which were opposed to the NPBP, e.g.: [2019](#), [2020](#), [2021](#).
- In addition, on a special meeting 5/23/2019 GFP received [186 public comments](#), 183 (98%) of which were opposed to trapping on public lands in general and NPBP in particular.

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\* [Underlined text](#) indicates links to a web resource (URL).

- Review of public comments sent to GFP – review by Alexey Egorov: [https://phas-wsd.org/wp-content/uploads/06Review-by-Alexey-EgorovPublicComments\\_final.docx](https://phas-wsd.org/wp-content/uploads/06Review-by-Alexey-EgorovPublicComments_final.docx)
- In 2019 ten(!) South Dakota non-government organizations on behalf of many thousands of members submitted a [joint letter to GFP](#), expressing concerns and disappointment regarding the announced NPBP. South Dakota hunters did not want GFP’s limited budget spent on this program and requested GFP to postpone any action on the NPBP.
- Similar [bounty program bill failed](#) in neighboring Iowa as a result of strong opposition from residents and NGOs.
- The [social survey](#) in support of NPBP conducted by a commercial firm ‘[Responsive Management](#)’ fails to inspire confidence. Rather than being a legitimate study designed to measure genuine public opinion, it appears a blatant manipulation – a pseudoscience intended to achieve a preconceived outcome. Here is a [detailed analysis](#) of this survey. The results of the survey are nearly diametrically opposed to those conducted by the [Remington Research Group](#) and other aforementioned points.

#### • Legal aspect

- Despite i) strong opposition from residents, hunters and professionals, ii) negative attitude in the media, iii) countless proofs of bounty ineffectiveness in scientific research, iv) dozens of examples how bounty programs failed in other states, and v) no evidence that NPBP is working to increase the pheasant population, GFP continue allocating millions of dollars in public funds to benefit a limited group (trappers).
- The NPBP may encourage fraud and illegal activity, such as trespassing and unlawful night hunting, submitting tails collected outside the allotted time period, out-of-state or from road kills.

#### • Lack of logic

- Is the goal to ‘enhance duck and pheasant nesting success’? There is a proven cheaper, sustainable and effective alternative – habitat restoration.
- How does killing indigenous animals for fun, in their natural habitat, to benefit an introduced species, promote biodiversity?
- Belief in bounties is a historic artifact, based in traditional practices and culture, that current science disputes.

#### • Better alternatives

- Predation is much lower when sufficient habitat for nesting birds is provided. Thus, habitat improvement alternative would be a much more effective way to increase nesting success of ground-nesting birds.
- Part of the rational/spin for the program is to introduce children to nature & trapping. Why not introduce children to nature via non-lethal interactions with wildlife such as

wildlife watching and spending money on nature guidebooks, binoculars, cameras & not via bounties & traps?

- Consider better alternatives such as, increasing days of free access to state parks, like [Every Kid Outdoors program](#) in neighboring Wyoming to encourage people to go outdoors.

- **Ecological aspect.**

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

- Good habitat also provides high-protein food sources, clean water and protection from the elements, all in a suitable arrangement. Habitat for pheasants/ducks also benefits various other wildlife & bird species.

- Nest predators also feed on rodents. Opossums also eat ticks. If these nest predators are successfully controlled, a rodent population outbreak can be expected, with a huge and potentially devastating impact on farmers and ranchers. Rodents eat grain in the field, & infest grain bins, outbuildings and farmhouses. In SD rodents carry Hantavirus or fleas/ticks that can have bubonic plague, or Lyme disease. These costs must also be considered.

- Pheasants are an exotic species that competes with a native species – the greater prairie chicken, whose range and population were declining. It was losing half its' population every decade as per IUNC 2016 report. More recent [2020 IUNC report](#) shows a recent increasing trend of the greater prairie chicken population.

- Even intense predator control has limitations. Those animals that escape capture or death often reproduce at a higher rate. This means more effort must be expended and more money must be appropriated each year.

- Several studies demonstrate a backfire compensatory effect — increasing the population of targeted or replacement (more reproductively aggressive) species due to increasing food availability, the proportion of females, litter size, survival rates, etc. (examples: [Missouri](#), [Georgia](#), [Nebraska](#)).

- Some nest predators are protected by state and federal laws and the NPBP will not kill them. This would include ALL raptors. (Hawks, owls and eagles are examples.)

- Accidental take of threatened and endangered or rare species may occur. The swift fox is state listed. The black-footed ferret is listed federally. There were petitions before the USFWS to list the plains spotted skunk and the prairie grey fox under the Endangered Species Act. The plains spotted skunk petition was denied. The listing decision on the prairie gray fox is anticipated in 2027.

- **Moral and ethical issues.**

- [290,841 animals have been killed](#) since 2019 in the frame of NPBP. Assuming that half of them were female, and the average litter is 4 kits/pups/joey's (usually litters are bigger),

>580,000 cubs were condemned to a long and painful death from dehydration, hunger and cold, or to predation without their mother's care.

- NPBP encourages the participation of youth under 18 years of age. Why teach children to kill cubs and pregnant/nursing females for fun during the peak of gestation/birth/nursing season?

- Empathetic children may encounter moral dilemmas such as how to kill the 12 or 13 babies in an opossum's pouch, and later learn that they did this killing of babies, based on lies told them by SD GFP about effects of a bounty program on nesting success. How does this engage children with nature or give them trust in our government?

- This program will result in animal cruelty. Some trappers will be trapping with leg-hold traps or snares, or body crushing traps. Some will use live traps. People should realize that in SD the law allows for animals to be left in traps West River for three and a partial day and East River for two and a partial day. Trapping can be cruel. In high heat or bitter cold, an animal in a box can die in half a day. Animals in boxes or leg-hold traps can freak out and damage their bodies and/or teeth & thus not survive even if released. Dead animals or animals in boxes or traps can't feed their dependent young. Even via a "live trap" non-target species adults and their dependent young will die, in addition to target species.

- A growing body of scientific research [[1](#), [2](#), [3](#), [4](#), [5](#), [6](#), [7](#), [8](#)] indicates a strong correlation (so called 'Link') between cruelty to animals and subsequent cruelty to humans, suggesting that acts of animal abuse is an indicator of future violent behavior towards people.

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\* [Underlined text](#) indicates a hyperlink to a document found on the internet. If you have a printed version, the hyperlink won't work. A digital copy of this document will be on the Prairie Hills Audubon Society web page on the NPBP.

<https://phas-wsd.org/sd-nest-predator-bounty-program/>

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