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Comments: The Black Hills Raptor Center advocates for alternative forms of prairie dog population control that do not include the poisoning of non-target species. The holistic stewardship of wildlife populations and habitat deserves equal consideration compared to other land use activities. The proposed amendment regarding the expanded use of anticoagulant rodenticides (ARs) would cause cascading harm to non-target species in the region.

Golden Eagles, Ferruginous Hawks, Turkey Vultures, and Burrowing Owls will be among the impacted birds of prey species if rodenticides are used in the region year-round. All of these species are protected by the Migratory Bird Treaty Act. Fatalities in nontarget species can happen from primary exposure, when the animal ingests the poison directly, or from secondary exposure, when the animal preys on a rodent that has ingested the poison.

From the point of ingestion, ARs take approximately 2-3 days to kill an animal, meaning poisoned prairie dogs do not immediately die in their burrow - they will be mobile and make easy prey for raptors. Whether ingestion is primary or secondary, the days between ingestion and death include internal bleeding, lethargy, bruised skin, blood that doesn't clot, and other painful symptoms.

The devastating impact of ARs on non-target species is a widespread and known issue for birds of prey, other wildlife, and even pets. This study (https://pmc.ncbi.nlm.nih.gov/articles/PMC6395208/) explains that various raptor species have over a 60% AR detection rate and risk of AR poisoning. More recent studies suggest that percentage may be higher, especially among Golden Eagles.

Why is it important to consider the spread and impact of ARs? Birds are an indicator of the state of our environment and communities. While many people may not be aware of the importance of birds of prey within an ecosystem, all people can understand that limitless rodenticide use on public lands is a public health issue. ARs commonly spread far beyond their intended location, getting swept into water sources via rainfall. This study (https://pmc.ncbi.nlm.nih.gov/articles/PMC6447514/) found ARs in fish.

The original language in the plan regarding ARs acknowledges the impact rodenticides have on migratory birds. However, the proposed language does not account for the extreme lethality of ARs. The inevitable increase in unnecessary and preventable deaths of birds of prey and other wildlife, including the endangered Black-Footed Ferret, will occur if this proposal moves forward.