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I agree with The Black Hills Raptor Center, which has long advocated for alternative forms of prairie dog population control that do not include the poisoning of non-target species.

The proposed amendment regarding the expanded use of anticoagulant rodenticides (ARs) would cause cascading harm to non-target species in the region.

The following information has been provided to supporters by the Black Hills Raptor Center. I have long been a vocal and financial supporter of the Raptor Center, and I agree with everything said here.

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.

Please stop this proposal before it does more damage to our already endangered species on the plains.

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South Dakota Living Poet of Merit, 2020
Author of:
Walking: The Changes (poems with photographs by James W. Parker)
Write Now, Here's How - Insights from Six Decades of Writing (August, 2020)
Gathering from the Grassland: A Plains Journal
Dakota: Bones, Grass, Sky, collected and new poems
The Wheel of the Year: A Writer's Workbook
Dirt Songs: A Plains Duet, with Twyla M. Hansen; No Place Like Home: Notes from a Western Life, Between Grass and Sky, Feels Like Far, Bitter Creek Junction, Land Circle, Dakota Bones, Going Over East, Windbreak, Bison: Monarch of the Plains, When a Poet Dies, The Roadside History of South Dakota, Roadkill, Caught By One Wing.

Editor of Leaning into the Wind, Woven on the Wind, Crazy Woman Creek with Gaydell Collier and Nancy Curtis; also editor of Journal of a Mountain Man, by James Clyman.