



April 5, 2011

Dan Forster, Director
Mark Williams, Commissioner
Georgia Department of Natural Resources
Wildlife Resources Division
2070 U.S. Highway 278 S.E.
Social Circle, GA 30025

Dear Director Forster and Commissioner Williams:

I am writing on behalf of the Center for Biological Diversity, One More Generation, the Coastal Plains Institute and Land Conservancy, and Protecting All Living Species concerning the wildlife display permit that was issued to Evans County Wildlife Club for the Claxton Rattlesnake Roundup under Georgia Code § 27-2-13. The Wildlife Resources Division was incorrect in issuing the permit because the law states that such permit shall only be issued when the exhibition or display is solely for educational purposes:

It shall be unlawful for any person to keep, hold, or possess any wildlife in captivity for the purpose of display or exhibition to the public without first procuring a valid wildlife exhibition permit as provided in Code Section 27-2-23. No such permit shall be issued by the department except where the exhibition or display is solely for educational purposes.

The sole purpose of the display of rattlesnakes at rattlesnake roundups is not education. The purpose of a "roundup," by definition, is to gather as many snakes as possible from the wild. The purpose of this snake-hunting contest is not education. The snakes are then displayed at the roundup as trophies from the hunting contest, and this is not solely for education. If the sole purpose of the event were to display rattlesnakes for educational purposes, this could be accomplished by displaying a few snakes that are already held in captivity by other institutions.

While we understand that there were educational exhibits at this year's event, such as a birds of prey display and a hunting simulator, those exhibits are not directly related to the permit for the display of rattlesnakes.

The display of rattlesnakes at roundups is the opposite of education. The educational message taken from roundups is that it is acceptable to persecute and overexploit wildlife species. By issuing the display permit, GADNR effectively endorsed Georgia's rattlesnake roundups, which is contrary to the agency's mission of conserving and protecting the state's resources for current and future generations.

GADNR has misconstrued the intent behind the wildlife display permit law. The legislative intent in passing §27-2-13 was to protect animals held by wildlife rehabilitators and others in lawful possession of an animal that could not be released if they chose to display those animals to the public for educational purposes. The law was not meant to encourage the removal of healthy animals from the wild, like roundups are doing.

The eastern diamondback rattlesnake has been extirpated from much of its former range and is a species in decline, as GADNR acknowledged in its January 2011 newsletter *Georgia Wild*. Habitat loss and overexploitation are pushing the eastern diamondback towards extinction, and your agency is endorsing the continued overexploitation of this imperiled species. The unlimited hunting of a declining species is not sustainable, as history reveals with examples such as the extinction of the eastern elk, passenger pigeon, great auk, Caribbean monk seal, Carolina parakeet, and numerous other species, all due to overhunting.

By issuing the display permit for the roundups, GADNR failed in its duty to correctly enforce the law and did a great disservice to the wildlife and people of Georgia.

We ask that future wildlife display permits not be issued for rattlesnake roundups, as the sole purpose of the display of snakes at these events is not education.

On behalf of all parties,



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