

Minutes of the Game, Fish, and Parks Commission

May 7-8, 2020

Chairman Gary Jensen called the meeting to order at 1:00 p.m. CT via conference call. Commissioners Gary Jensen, Travis Bies, Mary Anne Boyd, Jon Locken, Russell Olson, Doug Sharp, Charles Spring, Robert Whitmyre. Public and staff were able to listen via SDPB livestream and participate via conference call with approximately 145 total participants.

DIVISION OF ADMINISTRATION

Conflict of Interest Disclosure

Chair Jensen called for conflicts of interest to be disclosed. None were presented.

Approval of Minutes

Jensen called for any additions or corrections to the April 2-3, 2020 meeting minutes or a motion for approval.

Motion by Sharp with second by Olson TO APPROVE THE MINUTES OF THE APRIL 2-3, 2020 MEETING WITH MINOR REVISIONS. Motion carried unanimously.

Additional Commissioner Salary Days

No additional commissioner salary days were requested.

FY2020 Budget Discussion/Increase Adjustment

Chris Petersen, administration division director, detailed the FY2020 operating budget for GFP and outlined necessary budget adjustment to cover increased cost for employee health insurance benefits.

Motion by Olson with second by Sharp APPROVE THE FY20 BUDGET ADJUSTMENTS FOR THE DIVISION OF WILDLIFE OPERATIONS BUDGET OF \$548,302; AND THE SNOWMOBILE TRAILS BUDGET OF \$5,977 FOR HEALTH BENEFITS AS PRESENTED. Roll Call vote: Bies – yes; Boyd – yes; Locken – yes; Olson – yes; Sharp – yes; Spring – yes; Whitmyre – yes; Jensen – yes. Motion carried 8 yes and 0 no votes.

Covid 19 Update

Kevin Robling, deputy secretary, and Scott Simpson, parks and recreation division director, provided an update noting subcommittee meetings and the work done to install necessary measures to ensure safety and social distancing such as installing sneeze guards and moving furniture to follow CDC guidelines. No set date for opening wildlife offices at this time but are working to open division of Parks offices by May 15th if not before. Working to get signage up at fishing cleaning stations and opening comfort stations then visitors centers. Limited seasonal staff and interns will be hired to ensure necessary programs continue. Staff are getting creative to find innovative solutions.

Boyd encouraged online park entrance license sale as they work well and asked if staff will still be applying park entrance licenses when purchase at park entrances.

Simpson we will pass the sticker on to have visitors apply them themselves.

Tom Kirschenmann, wildlife division director, noted some activities will not happen. Normally the division would have 125-150 seasonal/interns to provide services and programs by this time of year which will not happen like it has in past years. Working to find solutions to provide services and programs focusing on prioritized services and programs such as ADC and AIS.

Sharp asked when all walk-in area program contracts go out and maybe now is a good time to review the acres enrolled and focus on the ones that truly meet what the public would expect.

Kirschenmann responded those walk-in area and crep programs happen year-round but renewals are happening now. Staff are making calls to contact for reenrollment of walk-in areas. There are financial limitations for crep, and we do not need to reenroll just make payment.

Robling thanked staff for their hard work during this time of uncertainty and encouraged the public to visit the GFP website and social media pages to find the most up-to-date information on COVID-19 as it relates to GFP.

Habitat Stamp

Robling provided an update on the habitat stamp.

PETITIONS

Tom Kirschenmann, wildlife division director, provided information on the petition process and options available for commission action.

Livetrapping Removal Date

Kirschenmann presented the petition submitted by Nancy Hilding, President of the Prairie Hills Audubon Society, Black Hawk, SD to change the trap removal date from September 1 to July 1 matching the 2020 Nest Predator Bounty Program timeframe.

Sharp said he does not entirely oppose the petition, but it is not practical to have all traps removed when the program ends and cannot approve as petition as written. Could see a practical application to have traps removed within 10 days of program end or a specific date.

Boyd agreed with Sharp that it's probably not practical.

Olson noted he supports the trappers in this state who do this for recreation, and they are not heartless murders as some may say. This is their form of recreation. Over the last decade we overlooked trapping. He does not support the petition.

Spring said he does not support the petition.

Motion by Olson with second by Whitmyre TO DENY THE PETITION. Roll Call vote: Bies – yes; Boyd – yes; Locken – yes; Olson – yes; Sharp – yes; Spring – yes; Whitmyre – yes; Jensen – yes. Motion carried 8 yes and 0 no votes.

Motioned by Bies with second by Olson TO APPROVE RESOLUTION 20-10 (appendix A) DENYING THE PETITION TO ADJUST THE LIVETRAP REMOVAL DATE. Roll Call vote: Bies – yes; Boyd – yes; Locken – yes; Olson – yes; Sharp – yes; Spring – yes; Whitmyre – yes; Jensen – yes. Motion carried 8 yes and 0 no votes.

PUBLIC HEARING

The Public Hearing began at 2:00 p.m. and concluded at 2:30 p.m. The minutes follow these Commission meeting minutes.

OPEN FORUM

Jensen opened the floor for discussion from those in attendance on matters of importance to them that may not be on the agenda.

Jim Kopriva, Raymond, SD, farmer who moved back to Clark County in 1991 and noticed have a mule deer problem. 4-7 of them in the area as well as others. Deer licenses say any deer and they should not include antlerless mule deer. Need to find a way to increase the mule deer population to build.

Bill Bowen, Aberdeen, SD Hunt Safe instructor since 1978. Previously spoke at a commission meeting and provided a written proposal that GFP needs to find an incentive to entice young people to be instructors. Volunteers at state parks get a campsite so what incentive could we give to Hunt Safe instructors to get them in the door.

Jerome Nelson, Lake Preston, SD said his parents and grandparents sold land to GFP and were told that GFP would provide habitat so it wouldn't create a problem for neighbors. Now hearing that food plots are being decreased. Kingsbury County news shows lots of accidents because the deer are running back and forth on the road because food plots are not being provided and the deer are being starved.

Kathleen Schmidt, Nemo, SD animals should be respected and cared for and not slaughtered. When populations are done quotas should be lowered. Complained that this program is a conflict of interest for people like the Governor who own hunting preserves and receive government subsidies. This program is cruel and inhumane that never should have started and should be stopped. Feels we have enough violence and GFP needs to find a better way to get families outdoors.

Commissioner Olson noted Governor Noem sold her interest in her hunting preserve in 2009.

Nancy Hilding, Black Hawk, SD spoke regarding the livetrapp removal date petition. Feels the department failed to revise rules to have traps removed on public lands to when the nest predator bounty program. Why are there an extra two months after the nest predator bounty program ends? Feels it is exceptionally cruel that animals are left in traps too long and thinks regulations should be changed. Thinks this is an animal welfare concern.

Susan Braunstein, Rapid City, SD would like to see the date changed to July 1. Opposes the nest predator bounty program. Hopes the commission will not have this program next year. Noted there is not scientific data to support this program.

PROPOSALS

Sage Grouse

Chad Switzer, wildlife administrator, explained that retaining a season closure is being recommended based on the season recommendation guidelines found within the "Sage-Grouse Management Plan for South Dakota, 2014-2018". Results from the 2019 spring lek surveys indicated 60 (66 in 2018) males counted on priority leks and 153 (168 in 2018) males counted on all leks. The 2020 spring lek surveys are still in progress and will be completed in mid-May. Preliminary results indicate similar number of males as documented in 2019.

River Otter Season

Switzer, Silka Kempema and Eileen Dowd-Stukel presented the recommended changes to establish a conservative the river otter trapping season as follows:

1. Establish a trapping season that is open from sunrise on November 1 to sunset on December 31 in all counties of the state.
2. Limit of one river otter per trapper per season.
3. Statewide harvest limit of 15 river otters. Season will end prior to December 31 if the harvest limit is reached.
4. Trapping season open to residents only with a furbearer license.
5. A river otter shall be reported to the Department within 24 hours of harvest. At time of reporting, arrangements will be made to check-in carcass and detached pelt at a GFP office or designated location for registration and tagging of the pelt within 5 days of harvest. Additionally, once the season has closed (last day of season or harvest limit reached), a person has 24 hours to notify the Department of a harvested river.
6. The pelt shall be removed from the carcass and the carcass shall be surrendered to the Department. After the pelt has been tagged, it shall be returned to the trapper. Upon request, the carcass may be returned to the trapper after the carcass has been inspected and biological data collected.
7. Any river otter harvested after the 24-hour period following the close of the season, will be considered incidental take and shall be surrendered to the Department.
8. A person may only possess, purchase or sell raw river otter pelts that are tagged through the eyeholes with the tag provided by the Department or if the river otter was harvested on tribal or trust land of an Indian reservation or another state and is properly and securely tagged with a tag supplied by the governmental entity issuing the license.

They explained River otter populations in South Dakota continue to grow and expand into available habitat. A statewide season will provide harvest information from across the state. It also provides the greatest opportunity to pursue trapping of river otter. Over the last five years (2015-2019) the Department has received an average of 16.6 incidentally trapped river otter/year. River otter are most frequently incidentally taken during the beaver trapping season given similarity of habitat and trapping methods. The majority (72%) of the 83 incidentally trapped river otter reported over the last five years were taken in November. Updates on river otter harvest will be available on the Department website and by calling a designated phone number. A press release and other information tools will be used when the harvest limit has been met, similar to the mountain lion harvest notification process.

Motion by Olson, second by Locken TO APPROVE THE CHANGES TO THE RIVER OTTER TRAPPING SEASON AS RECOMMENDED. Roll Call vote: Bies – yes; Boyd – yes; Locken – yes; Olson – yes; Sharp – yes; Spring – yes; Whitmyre – yes; Jensen – yes. Motion carried 8 yes and 0 no votes.

Fall Turkey (proposed in April - no action necessary)

Lost License Replacement (proposed in April - no action necessary)

Administrative Rules Review ARSD 41:08, 41:09, 41:10 and 41:13 (proposed in April - no action necessary)

FINALIZATIONS

River Otter Delisting

Kempema and Dowd-Stukel presented the recommended change to remove the North American River Otter from the list of state threatened mammals. They explained several factors have allowed river otter populations to rebound across much of their former range, including reintroductions, improvements in wetland and river habitat management, and protections afforded under various state threatened and endangered species laws therefore the Department recommends that protection under the state endangered species law is no longer justified.

Motioned by Locken, second by Olson TO DELIST THE RIVER OTTER. Roll Call vote: Bies – yes; Boyd – yes; Locken – yes; Olson – yes; Sharp – yes; Spring – yes; Whitmyre – yes; Jensen – yes. Motion carried 8 yes and 0 no votes.

Flathead Catfish – Border Waters

John Lott, fisheries chief, presented the proposed change to limit the harvest of flathead catfish 30 inches or longer in length to at most, one fish daily, as part of the daily limit in the Nebraska/South Dakota border waters. Lott explained “One Over” regulations are effective at reducing harvest of fish when it is common for anglers to catch two or more fish above the specified length during a fishing trip. No negative impacts of a one- over-30” regulation on flathead catfish populations are anticipated, however, staff believe the regulation will not result in an increase in larger flathead catfish.

Motioned by Boyd, second by Sharp TO APPROVED THE RECOMMENDED CHANGES TO THE FLATHEAD CATFISH LIMITS AS PRESENTED. Roll Call vote: Bies – yes; Boyd – yes; Locken – yes; Olson – yes; Sharp – yes; Spring – yes; Whitmyre – yes; Jensen – yes. Motion carried 8 yes and 0 no votes.

Archery Deer Season

Switzer presented the recommended changes to archery deer season from the March proposal as follows:

1. Modify the season start date for Lacreek National Wildlife Refuge from the fourth Saturday of September to September 1.
2. Modify the season start date for Sand Lake National Wildlife Refuge from the third Saturday of October to September 1.
3. In addition to the one “antlerless whitetail deer” license for residents and nonresidents for Unit ARD-LM1, make an allowance for no more than 500 single-tag “antlerless any deer” licenses

that would be distributed amongst all municipal archery deer hunting units. Regular price of a single tag “any antlerless deer” resident license.

4. Establish municipal archery deer hunting units for the following city limits: Custer, Rapid City and Sioux Falls. Season structure and specific regulations would be determined by the appropriate municipality within the requirements and restrictions of the South Dakota archery season.

Municipality	Unit	# Antlerless DeerLicenses
Custer	ADM-CU1	45
Rapid City	ADM-RC1	60
Sioux Falls	ADM-SF1	60

Motioned by Spring, second by Locken TO APPROVE THE RECOMMENDED CHANGES TO THE ARCHERY DEER SEASON. Roll Call vote: Bies – yes; Boyd – yes; Locken – yes; Olson – yes; Sharp – yes; Spring – yes; Whitmyre – yes; Jensen – yes. Motion carried 8 yes and 0 no votes.

Motioned by Boyd, second by Olson TO APPROVE THE ADMINISTRATIVE ACTION AUTHORIZING MUNICIPAL LICENSE ALLOCATION BY UNIT. Roll Call vote: Bies – yes; Boyd – yes; Locken – yes; Olson – yes; Sharp – yes; Spring – yes; Whitmyre – yes; Jensen – yes. Motion carried 8 yes and 0 no votes.

Youth Waterfowl Season

Chad Switzer, wildlife program manager, presented the recommended change to the youth waterfowl season to modify the eligibility from youth who have not reached the age of 16 to youth who have not reached the age of 18.

Motioned by Bies, second by Olson TO APPROVE THE CHANGES TO YOUTH WATERFOWL SEASON AS RECOMMENDED. Roll Call vote: Bies – yes; Boyd – yes; Locken – yes; Olson – yes; Sharp – yes; Spring – yes; Whitmyre – yes; Jensen – yes. Motion carried 8 yes and 0 no votes.

Youth Pheasant Season

Switzer presented the recommended changes to amend the youth pheasant season proposal to modify the season dates from “five consecutive days beginning on the first Saturday of October” to “9 consecutive days beginning 21 days prior to the third Saturday of October”. See season dates in table below.

Year	Youth Pheasant Season Dates
2020	Sept. 26 - Oct. 4
2021	Sept. 25 - Oct. 3
2022	Sept. 24 - Oct. 2
2023	Sept. 30 - Oct. 8
2024	Sept. 28 - Oct. 6
2025	Sept. 27 - Oct. 5
2026	Sept. 26 - Oct. 4
2027	Sept. 25 - Oct. 3
2028	Sept. 30 - Oct. 8
2029	Sept. 29 - Oct. 7

Motioned by Spring, second by Boyd TO APPROVE THE CHANGES TO THE YOUTH PHEASANT HUNTING SEASON RECOMMENDED. Roll Call vote: Bies – yes; Boyd – yes; Locken – yes; Olson – yes; Sharp – yes; Spring – yes; Whitmyre – yes; Jensen – yes. Motion carried 8 yes and 0 no votes.

DIVISION OF PARKS AND RECREATION

Spring Creek Concessions

Scott Simpson, Parks and Recreation Division Director, provided the Commission with information on the proposal received by Frost Enterprises of Onida, SD to run the restaurant at Spring Creek.

Motion by Olson, second by Boyd TO AUTHORIZE GFP TO OFFER A ONE YEAR LEASE FOR THE SPRING CREEK RESTAURANT TO FROST ENTERPRISES. Roll Call vote: Bies – yes; Boyd – yes; Locken – yes; Olson – yes; Sharp – yes; Spring – yes; Whitmyre – yes; Jensen – yes. Motion carried 8 yes and 0 no votes.

Visitation and Sales Report

Al Nedved, parks and recreation deputy director, provide the year to date revenue, camping and visitation reports for all parks and districts.

DIVISION OF WILDLIFE

License Adjustments for Select East River Deer Season Units

Kirschenmann presented the department recommendation for 2020 East River deer season and Refuge deer season, adjust all “any antlerless deer” tags to “whitetail antlerless tags”. He explained Based on conversations with a landowner from eastern SD requesting the Commission to change licenses to protect the harvest of mule deer, the department is recommending the Commission adjust all antlerless tags for the East River deer and Refuge deer seasons to be whitetail antlerless tags. From a population management standpoint, the restriction of harvesting the female segment of the population is most important. This adjustment would provide additional harvest limitations for the fall of 2020. This change does not require the rule promulgation process as it is not a change to administrative rule. License types and number per hunting unit are recorded in Commission meeting minutes and would require the commission to approve the change and the department can incorporate into the license application process. The Department and Commission will begin discussions on a broader scale of mule deer management over the next several months with the intention of bringing forward changes and adjustments to mule deer harvest strategies in the spring of 2021 when the next 2-year cycle of deer seasons is considered.

Motioned by Locken, second by Olson TO ADJUST ALL “ANY ANTLERLESS DEER” TAGS TO “WHITETAIL ANTLERLESS TAGS AS RECOMMENDED. Roll Call vote: Bies – yes; Boyd – yes; Locken – yes; Olson – yes; Sharp – yes; Spring – yes; Whitmyre – yes; Jensen – yes. Motion carried 8 yes and 0 no votes.

Nonresident Waterfowl Structure Briefings

Kirschenmann provided the Commission information on the nonresident waterfowl structure.

HuntSafe Update

Taniya Bethke, division staff specialist-education and R3 coordinator, provided the Commission information on online HuntSAFE and HuntSAFE in the schools.

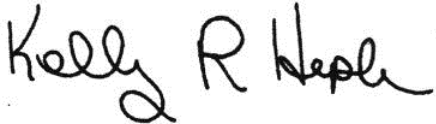
Licenses Sales Update

Heather Villa, wildlife administration chief, said License sales are on an upward trend when comparing to 2019 numbers. Our Resident Combination licenses are up 25% and Resident Annual Fishing licenses are up 89%. Our data shows that license holders are purchasing their licenses earlier in the year. This is to be expected with having better weather compared to last year's extended winter. However, we are showing the highest Resident Annual Fishing and Resident Combination license sales in 5 years. Nonresident Annual Fishing licenses are up 32% and are trending similarly to 2018, but are still lower than 2016 and 2017

Adjourn

Meeting adjourned at 5:00 p.m.

Respectfully Submitted,

A handwritten signature in black ink that reads "Kelly R Hepler". The signature is written in a cursive, flowing style.

Kelly R. Hepler, Department Secretary

Public Hearing Minutes of the Game, Fish and Parks Commission May 7, 2020

The Commission Chair Gary Jensen began the public hearing at 2:00 p.m. CT via conference call. Commissioners Gary Jensen, Travis Bies, Mary Anne Boyd, Jon Locken, Russell Olson, Doug Sharp, Charles Spring, and Robert Whitmyre were present. Olson indicated written comments were provided to the Commissioners prior to this time and will be reflected in the Public Hearing Minutes. Olson then invited the public to come forward with oral testimony.

River Otter Delisting

Susan Braunstein, Rapid City, SD, just because a mammal is doing well, we should not slaughter it. We have enough animals to trap and kill and trappers do not need another animal to kill and receive profit for. Trappers should not have this much influence on GFP. Thank you to the Flandreau Santee Sioux Tribe for their work in reintroducing the river otter.

Nancy Hilding, Prairie Hills Audubon Society President, Black Hawk, SD does not think the listing status is appropriate. Before delisting you should collect data on size, population structure and more. There should have been a more scientific way of collecting data. Noted the threats such as water pollution were not addressed. The largest number of otters noted was 42 which is not counted accurately and doesn't support the 30 otter per year take. Would like to see a western South Dakota reintroduction.

Julie Anderson, Rapid City, SD spoke against the delisting of the river otter. Commented and feels voice has been stifled. The R3 resolution the commission passed prioritizes user's ability to participate, new and existing users and if it enhances quality of life. All decisions made by this department focus on hunting fishing and trapping. This increase should promote hiking, biking and photography.

Sondra Seberger, Rapid City, SD objects to removal of river otter from the state threatened and endangered species list. We like to see creatures in their natural habitat and oppose killing when there are only 32 of them.

Jim Peterson, Rapid City, SD oppose to the delisting of the river otter. This animal is susceptible to low water quality. SD DENR innovative report shows these waters do not support the biological uses. The most they ever found in one year is 48. People come to South Dakota to see the wildlife. We need to develop these creatures for tourists.

Flathead Catfish

No verbal comments were made

Archery Deer Season

No verbal comments were made

Youth Waterfowl

No verbal comments were made

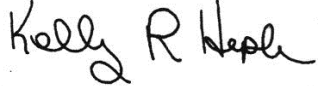
Youth Pheasant Season

No verbal comments were made

See attached written public comments submitted prior to the public hearing

The public Hearing concluded at 2:30 p.m.

Respectfully Submitted,

A handwritten signature in black ink that reads "Kelly R Hepler". The signature is written in a cursive, flowing style.

Kelly R. Hepler, Department Secretary

Appendix A
RESOLUTION 20-10

WHEREAS, Nancy Hilding of Black Hawk, South Dakota, submitted a Petition to the Game, Fish and Parks Commission (Commission) dated April 30, 2020, requesting that the Game, Fish and Parks Commission amend ARSD § 41:08:02:13 (Traps to be rendered inoperable – Removal of trapping devices) – to amend the date of removal from September 1 to July 1 for the reasons more fully set out in the petition (hereinafter referred to as “the Petition”); and

WHEREAS, all members of the Commission have been furnished with and have reviewed a copy of the Petition; and

WHEREAS, the Commission has been advised that a copy of the Petition has been served on all members of the Interim Rules Review Committee and Director of the Legislative Research Council as required by SDCL § 1-26-13; and

WHEREAS, the Commission has been advised that SDCL § 1-26-13 requires that within thirty (30) days of submission of a Petition, the Commission shall either “deny the petition in writing (stating its reasons for the denials) or shall initiate rule-making proceedings in accordance with SDCL 1-26-4.”; and

WHEREAS, the Commission has been advised and is of the opinion that a hearing on the Petition is neither statutorily required nor necessary; and

WHEREAS, the Commission has reviewed and carefully considered the requirements and procedures set out in SDCL §1-26-13 and the contents of the Petition, including the reasons advanced by Petitioner in support of modifying the removal date from September 1 to July 1; and

WHEREAS, in 2019, the Commission took action and public testimony and ultimately changed administrative rule to allow live traps on public lands through September 1.; and

WHEREAS, the Department continues to support and advocate for live traps to be allowed on public lands throughout the summer regardless if there is a bounty program or not; and

WHEREAS, the petition’s suggested change would restrict or take away opportunity for trappers to utilize public lands during the summer which is contrary to the Department’s R3 efforts.

NOW, THEREFORE, BE IT RESOLVED, that the Commission does hereby deny the Petition for the reasons hereinabove stated in this Resolution, which said Resolution as adopted by the Commission shall constitute the Commission’s written denial of the Petition and its reasons, therefore.

BE IT FURTHER RESOLVED that the Petition, a record of the Commission’s discussions concerning same, and this Resolution be made a part of the Minutes of the Commission meeting at which this Resolution is adopted, and further, that the Department be and it is hereby authorized and directed in compliance with SDCL §1-26-13 to serve a copy of an extract of that portion of the Commission minutes which pertain to the Commission’s discussion of the Petition and its adoption of this Resolution, including a copy of the Resolution, on all members of the Interim Rules Review

Committee and Director of the Legislative Research Council with copies also to be provided to the Petitioner, Nancy Hilding of Black Hawk, South Dakota.

Public Comments

Fall Turkey

Eri Anderson

Spearfish SD

Position: oppose

Comment:

I do not support fall turkey tags in the Black Hills, specifically in the northern hills. The GFP itself has highlighted declining turkey populations in this area of the hills and it is clearly happening. Tough winters and poor spring have led to much reduced turkey populations in the northern region. While 200 tags is minimal and meant to appease the few areas with overpopulations of turkeys, I don't feel the issuance of any licenses in the Black Hills is necessary.

Other

Pat Ronan

Sioux Falls SD

Position: other

Comment:

As you are aware, South Dakota is practically the epicenter for out-of-state sportsmen at this time of year. With the snowgeese here and our walleye season open while others (especially MN) are closed, we get a huge influx of out-of-state hunters and fishermen. This is unacceptable right now. It is one thing for in state sportmen to hunt and fish responsibly but we definitely want to decrease any influx of people from outside our state. Some states, like Texas, have just implemented a mandatory quarantine of 14 days for anyone travelling into their state. On top of it, guides are posting that people should "come to South Dakota. No safer place to be right now" (see attached example). It will not be safe if we continue to allow unimpeded travel into the state.

Verl Scheibe

Custer SD

Position: other

Comment:

I read an article from the Mitchell paper, (at least as of 1 April) the boat docks for fishing on the Missouri River are still open, and lots of folks from other states are coming in to fish. That's the last thing we need is to have a large flux of folks traveling here when we are self quarantined. I fully understand the out of state business I'd good- but when everyone, and business here are staying home, attempting to reduce health risk, why on good earth, isn't the SD Game And Fish closing the boat ramps to prevent out of state (and in state) folks who don't care about the health risks from congregating in those concentrated areas? Do your part in this with the rest of us. Take a head from your governor!

Jennifer Belle

Athens OH

Position: oppose

Comment:

I fell in love with the beauty of SD as a child and have been returning ever since. However, I was horrified to learn that SD voted to approve a trophy hunting quota of 60 mountain lions for both the 2019 and 2020 hunting seasons, a devastating 30% of the population.

On top of already allowing this many mountain lions to be hunted, the shameful part is that there will be an increase in permits for hunters to use their hounds to hunt mountain lions at Custer State Park. Using hounds is an incredibly cruel way to terrify and kill the animals.

If the Corona Virus has taught us anything, it is the harm from human interference with wildlife that is cause to humans as well as animals. I respectfully urge and implore you to end these harmful hunts to the ecosystem of this apex, majestic and crucial species. This atrocity has seriously made me reconsider future visits to beautiful SD.

Jonathan Eckrich

Sioux Falls SD

Position: other

Comment:

Concerning the Sioux Falls archery access permit, in 2019 hunters were required to FIRST purchase an archery tag before they could apply for the permit. The same was true for Great Earth. This is burdensome for hunters like me because if we do not win the access permit, we are stuck with what amounts to a very expensive hunter preference point. I do not have any other hunting possibilities so the tags I bought went unused. This seems unfair. A better way is to do it how it used to be done. That is, hunters may apply for the access permit, then when successful they can purchase the appropriate archery tag. This is much more fair as hunters are not compelled to buy expensive licenses until they are assured of a place to hunt.

River Otter Delisting

John Hopple

Black Hawk SD

Position: support

Comment:

Hello Sec Hepler, Chairman Jensen and Commissioners. The South Dakota Trappers Association strongly supports the delisting of the river otter. We believe that the ability to manage this animal should rest with in the Game Fish Parks. By delisting this animal this will provide GFP the decision making power to manage this species. Based on their decisions after this action the river otter will continue to flourish and expand its areas of availability through out the state. Other western states have seen these issues and expansions once animals were delisted. The wolf in our neighbor states is a prime example. State GFP officials have a better grasp of how and where to make decisions and those decisions will enhance the otter's outcome for the betterment of the species.

Thank You for your time

John Hopple

SDTA President

Gary Fawbush

Madison SD

Position: support

Comment:

I feel with the ever increasing number of otters that delisting them would be a good policy at this time.

thank you

Matthew Bennett

Colman SD

Position: oppose

Comment:

I personally 100% support the delisting of the River otter. I am a trapper and trap every year. For many years now I cannot even set beaver traps anymore because of the otters. They are everywhere. I even catch them in dry land coon sets. I have caught many over the years and turned them in. They are in the vermilion River the Big Sioux River Battle Creek Skunk Creek and all connecting water ways! As well as a number of pothole sloughs! And the lake's also. Lake Madison chain Lake Campbell and Lake Thompson to name a few. That is a FACT!!! I have personally seen them in all those places! We do need a trapping season for them!! It's about a balance for the carrying capacity of the land!!

Youth Pheasant Hunting Season

Paul Lepisto

Pierre SD

Position: support

Comment:

On behalf of SD IWLA Division President Kelly Kistner please see the attached comments in support of the Youth Pheasant Season proposal.

Savanah Hendricks

Vivian SD

Position: support

Comment:

This was presented to me at school.

Savanah Hendricks

Vivian SD

Position: support

Comment:

This was presented to me at school.

Savanah Hendricks

Vivian SD

Position: support

Comment:

This was presented to me at school.

Savanah Hendricks

Vivian SD

Position: support

Comment:

This was presented to me at school.

Diana Hendricks

Vivian SD

Position: support

Comment:

The ability to support not only youth but to get families in the field is very limited. This change will double the opportunity to get families into the field and hopefully create new traditions and memories for years to come. What are daughter has courageously done and thought out is an opportunity for for the next generation to help sustain the hunting industry in SD. It may take years to really see the impact this can have but nothing worth doing was ever said to be simple or fast! Knowing that we are not actually gaining any extra days and actually losing a day, for those who do not understand the petition or the proposal, but we will have instead 4 much more accessible days for active students and athletes, gives me hope that plain common sense is still available in our local leaders! Thank you to all who see this as an improvement to the Youth Pheasant Hunting Season. Please support this change!

Paul Lepisto

Pierre SD

Position: support

Comment:

On behalf of SD IWLA President Kelly Kistner please see the attached comments in support of the Youth Pheasant Season Proposal.

Thank you.

Youth Waterfowl Season

Paul Lepisto

Pierre SD

Position: support

Comment:

On behalf of SD IWLA President Kelly Kistner please see the attached comments in support of the Youth Waterfowl Season proposal.

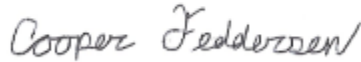
Thank you.

Savanah Hendricks, Vivian, SD - Attachments

To whom it may concern,

I am in agreement with Savanah Hendricks. I am a student at Jones County and after school activities normally fill my after school time. From my practice and games, and my siblings games it is hard to find time to go out and hunt. Hunting is one of my favorite past-times and it is unfortunate that we have such little time to hunt. I also support the petition to change the Youth Pheasant Hunt days.

Sincerely,



Cooper Feddersen

To whom it may concern:

I am in agreement for a petition rule change which is to increase the number of days that youth can hunt to include two full weekends due to school extracurricular activities. Being a fellow multi-sport athlete I find myself on a routine where many activities get conflicted with school sporting events such as practice and games. Hunting in particular is definitely looked at as weekend expenditure and is hard to exercise and enjoy during weekdays due to school activities.

Sincerely,



Jake Dowling

I am a student at the Jones County School, and I am wanting to change the youth pheasant hunting season to better accommodate students and athletes. I am an active student and athlete, which takes up time that I want to use for hunting. With practice until six or sometimes six thirty, there isn't time to do anything else. Homework takes time away, too, and after that, there is only time to eat before I go to bed. Church is another thing that takes time away from hunting. On Wednesdays, I don't have anything after school until Youth Group (a church group that kids go to) at 5:30, and then I also have homework, so Wednesdays are full too. The only days I have to hunt are days off from school and Saturdays. On Sundays, I have church from 9:00-11:00, and then lunch and family time. With busy schedules like mine, I barely have time to hunt, and I would like to change that.

Sincerely,



Tristen Host

To whom it may concern,

I am in agreement with Savanah Hendricks. I am a student from Jones County High School who is involved in Football, Basketball, Cross Country, Track, Rodeo, National Honor Society, and many other extra-curricular groups. I support the petition to change the Youth Pheasant Hunt days. I hope you agree too.

Sincerely,



Wyatt Olson



SOUTH DAKOTA
DIVISION

The Izaak Walton League of America

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

April 21, 2020

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

Dear Commissioners,

The South Dakota Division of the Izaak Walton League of America (Division) appreciates the opportunity to comment on the proposed changes to the Youth Pheasant Season. The proposal modifies the youth season from the current five consecutive days beginning the first Saturday of October to nine consecutive days beginning 21 days prior to the third Saturday of October. This proposed change resulted from a petition presented by Savannah Hendricks at your March meeting and was adopted as a proposal open to public comment at your April meeting.

The Division supports this proposal, we believe it's a great way to get more young people in the field and engaged in hunting. Last year the number of resident pheasant hunters hit the lowest number since 1938. The Division believes we must turn that disturbing trend around and the change in the youth pheasant season is one way to accomplish that. The proposal also meets the R3 criteria of Recruit, Retain and Reactivate which we whole heartily support. The proposal allows young hunters additional time to hunt without heavy hunting pressure. The added time also provides a great opportunity to teach kids ethical and safe hunting practices.

The proposed expanded youth season may help increase participation in what historically has been an under-utilized hunting opportunity. We encourage the Department to vigorously promote this expanded youth season, so we see growth in youth and family participation in pheasant hunting.

The South Dakota Division of the Izaak Walton League of America urges the Commission's support of this proposal and we thank you for the opportunity to comment on it.

Sincerely,

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



SOUTH DAKOTA
DIVISION

The Izaak Walton League of America

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

March 30, 2020

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

Dear Commissioners,

The South Dakota Division of the Izaak Walton League of America (Division) appreciates the opportunity to comment on the proposed Youth Pheasant Season. The proposal modifies the youth season dates from the current five consecutive days beginning the first Saturday of October to two consecutive weekends with the first weekend beginning 21 days prior to the third Saturday of October. The proposed change came from a petition presented by Savannah Hendricks during your March meeting that was adopted as a formal proposal open for public comment.

The Division supports this proposal as we believe it's a great way to get more young people in the field and engaged in hunting. The number of resident pheasant hunters has hit the lowest number since 1938. The Division believes we must turn that around, the change in the youth pheasant season is one way to accomplish that. The proposal also meets the R3 criteria of Recruit, Retain and Reactivate. The proposal allows young hunters an additional weekend to hunt without heavy hunting pressure. The added time provides a great opportunity to teach kids ethical and safe hunting practices.

The expanded youth season may help to increase participation in what historically has been an under-utilized hunting opportunity. We also encourage the Department to vigorously promote this youth season, so we see growth in youth and family participation in pheasant hunting.

The South Dakota Division of the Izaak Walton League of America urges the Commission to approve this proposal and we thank you for the opportunity to comment on it.

Sincerely,

Kelly Kistner

National IWLA President and President of the South Dakota Division of the IWLA
603 Lakeshore Drive
McCook Lake, SD 57049
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iwlasdpresident@outlook.com



SOUTH DAKOTA
DIVISION

The Izaak Walton League of America

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

March 30, 2020

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

Dear Commissioners,

The South Dakota Division of the Izaak Walton League of America (Division) thanks you for this opportunity to comment on the Youth Waterfowl Season proposal.

This proposal would include residents and nonresidents hunters who aren't 18 years old by the opening day of the season. To participate the youth must be accompanied by an adult and be properly licensed to hunt waterfowl in South Dakota, unless they're taking part in a mentored hunt as described in law.

This would create an added opportunity for 16 and 17-year-old hunters to participate in the youth waterfowl season. Engaging this age demographic hopefully will get them excited about waterfowl hunting and recruit them into the activity. The proposal supports the R3 goals of Recruit, Retain and Reactivate that the Division also supports.

The South Dakota Division of the Izaak Walton League of America urges the Commission to approve this proposal and we appreciate the opportunity to comment on it.

Sincerely,

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

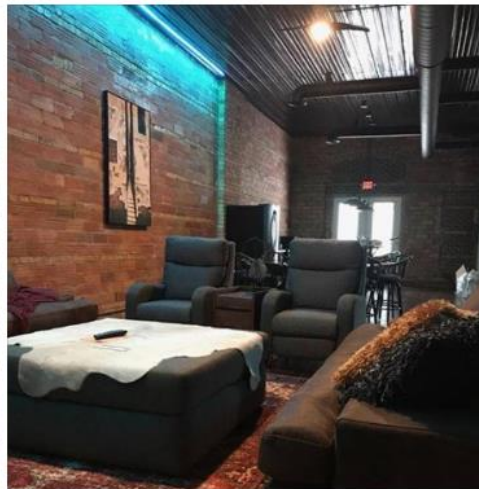


Bob Berens ▶ **Snowgoose Migration**



1 hr · 

Just starting to get good in South Dakota with lots of cancellations with coronavirus. No place safer than South Dakota right now with great lodging. Bob 651-230-4935



 20

4 Comments

 Like

 Comment

 Share



Chris Greene
Thought all the geese moved north?



Bob Berens





Joe Olson shared his first post.



New Member · March 25 at 5:15 PM

Now that MN is on lockdown, are there any of you guys still going to SD to hunt snows? I'm supposed to go next weekend. Can you still legally travel to hunt? It's really not essential. Lol. Could a guy get in trouble. Thoughts? TIA.



10

144 Comments



Like



Comment



Share

[View 46 more comments](#)



Riverview Retreats The lockdown specifically says you can leave for outdoor recreation like hunting and fishing



3

Like · Reply · 4d



Jon Ray We're here now

Like · Reply · 2d



Write a comment...





Spencer Vollmer

17 hrs



Anyone think there will be birds left in northern South Dakota in two weeks



3

15 Comments



Like



Comment



Share

[View 11 more comments](#)



Tyson Warner Nope

Like · Reply · 11h



Eric Davidson We are supposed to get snow Thursday in North Dakota



Like · Reply · 9h



Write a comment...





South Dakota Snows shared a post.

Like Page



15 hrs

The last 3 days have been 🔥🔥 We can still sneak one more group in here this week yet - first come first serve basis. 605-728-2815



60

8 Comments 1 Share

Like

Comment

Share



Ronan 1 of 2_Jacks....pdf



March_26_2020_IA....zip



IAC



Write a comment...



Nick Posusta shared a post.



20 hrs

Welcome to the show!



WWW.EAGLEHEADOUTDOORS.COM

Spring Snow Goose Hunting in South Dakota & Missouri – Eaglehead Outdoors

[Learn More](#)

12,063 Views

Eaglehead Outdoors

February 28

Like Page

It's about to get ugly 🤔
#skvbustinatothernorth



Roberta Atkins



Public Comments

Administrative Rules Review

Duke Remitz

Frederick SD

Position: oppose

Comment:

Please DO NOT approve the increased non-resident waterfowl licenses. This measure not only sells out the resident waterfowlers but most importantly selling ducks for bucks. That's NOT conservation !!! That's rape !!! That money only goes into the few hands that have leased property. Don't turn SD into Arkansas. Very little money will be spread to other businesses.

I know GFP has been hit hard budget wise. I understand that. There are other avenues to pursue to increase revenue. The stamp might be one way, 1 penny gas tax, Cut down the states staff ect...

We have to change the mindset of the landowner. Does it mean incentivize them??? Maybe. Idea: Instead of paying \$250,000 for tails why not ,say, give \$5.00 more per acre for landowners who sign up new CRP. If my SD math is correct that could be up to 50,000 acres let's say for 5 years? Put the money in the ground for all wildlife. Thanks, Duke Remitz Frederick SD.

Jamie Al-Haj

Rapid City SD

Position: support

Comment:

I am in favor of changing the live trap removal date from September 1st to July 1st in order to match the 2020 Nest Predator Bounty Program (NPBP) time frame.

Other

Eugene Zach

Rapid City SD

Position: oppose

Comment:

your computer is system is the most asinine garbage I've ever dealt with.

Charlene Clifford

Howard SD

Position: other

Comment:

Beautiful Day at Lake Herman
Gods blessings My Best friend and Good freinds
Look what I caught
Thank you for a Beautiful Day
Charlene Clifford

Jerry Wilson

Vermillion SD

Position: oppose

Comment:

River Otter delisting. I oppose delisting the river otter. I am an avid outdoorsman, and I have NEVER seen a river otter in South Dakota! Yet, with very limited scientific data, you propose opening trapping on otters!?

This makes no sense. Please don't do it.

River Otter Delisting

Daniel Bjerke

Rapid City SD

Position: oppose

Comment:

My family has owned property in Grant County that the South Fork of Yellowbank River runs through since the mid-1930s. The number of River Otters that I personally have seen on the South Fork of Yellowbank River you can count on one hand in my life time and I am 71 years old and I have been a lot of time on our property. There just aren't that many that occupy the South Fork of Yellowbank River. I am curious what statistics the GF&P has on the numbers of River Otters in SD in recommending delisting the River Otter. What's the advantage to the GF&P for delisting them? Please vote not to delist them. Thank you.

Ross Wright

Sioux Falls SD

Position: oppose

Comment:

I oppose the decision to de-list river otters. This decision needs more study and deliberation. Any move to de-list river otters at this time is likely to be met with costly litigation exposing tax-payers to unnecessary expenses. Discretion seems to be the better part of valor here. Please gather more information to make a fully informed decision as there is no public pressure here to de-list otters. Unlike grizzlies or wolves eating elk, deer, and live-stock, the current handful of otters are harmless and are worth more alive than dead. Plenty of other fur-bearers for folks to trap. Please vote no to de-list otters. For all the time I have spent on the Big Sioux, I have yet to see one. I'd like to someday.

David O'hara

Sioux Falls SD

Position: oppose

Comment:

We have too little data on this species' current population. Given the fact that it has come close to extirpation in the recent past, it would be unwise to delist it now. The otter is a key species for moderating the populations of all of its prey species, and it is also a charismatic species whose presence draws tourists to observe our waters in kayaks and canoes. My Augustana ecology students look for them and very rarely observe them. Let's keep them on the list until we can demonstrate with hard data that they are a stable and strong population.

David O'Hara, Ph.D.
Professor of Environmental Studies
Director of Sustainability
Augustana University, Sioux Falls

Teddy Thoms

Sioux Falls SD

Position: oppose

Comment:

PLEASE LEAVE THE OTTERS ALONE - DON'T BE SO TRIGGER HAPPY.

THANKYOU

Hannah Norem

Sioux Falls SD

Position: oppose

Comment:

No comment text provided.

Katie Tlusty

Sioux Falls SD

Position: oppose

Comment:

I think it may be too early to delist the otter. The ecosystem in which they live and their numbers are not stable enough to delist.

Andrew Reinartz

Sioux Falls SD

Position: oppose

Comment:

Given the lack of a full enough u see standing if the resiliency of such a small population, it seems much too soon to consider delisting the River Otter.

Jordan Deffenbaugh

Sioux Falls SD

Position: oppose

Comment:

No comment text provided.

Garrett Schempp

Sioux Falls SD

Position: other

Comment:

I am a frequent runner in the Sioux Falls area and one of the most exiting experiences I have had on the trails was witnessing three river Otters on a frozen over Big Sioux River in the middle of winter in 2018. It was late, dark and cold as I trotted along the Yankton Trail by the soccer fields on the south side of town. With my music playing and mind focused, I attempted to focus in the cold. Yet, all of a sudden I noticed motion out of the corner of my eye. To my amazement, I spotted three River Otters in the middle of the River. Two were standing on top the eyes with the third bobbing in the hole that had been created. This lasted maybe a minute before they took off under the ice. I say this was amazing because prior to this experience I did not know the Big Sioux maintained an Otter population. I even reached out to a local friend to ask if what I had seen was possible. Once confirmed, I've remembered that run ever since. And this is the power of nature. To transcend and awe those of us unaccustomed to witnessing such events. Therefore, I am skeptical of the proposal to delist the River Otter from the endangered species list for the very simple reason of data. In my mind, if the goal is to truly re-create and support a thriving River Otter population then opening up the population to trapping too early would not only waste the past years of rebuilding, but also cause issues going forward as the only outcome would be to re-list them in the future. Now, I'm sure, or at least would hope, that if this proposal were approved it would come with a continued proactive stance regarding population support. With that in mind, I'm aware that I may be missing some facts regarding this proposal. However, what I would really like to convey to those looking at the proposal is the idea that once you commit resources to a cause, DO NOT pull out prematurely do to the "minimal requirements" being met. I believe here in the Mid-West we have cultivated a culture of "Doing the job right the first time" and would like to believe it will continue going forward. Thank you for your time and good luck with making the right decision.

Roger Foote

Watertown SD

Position: oppose

Comment:

In my 18 years of working along the Big Sioux River from Watertown to Summit, I have only observed a single individual and that was within the city limits. I do not believe the population numbers are sufficient to justify de-listing. thank you

Dr. Carl Scott

Provo UT

Position: oppose

Comment:

This is not so common an animal as is presumed in the proposed in listing. How many South Dakotans have had the opportunity to observe one in the wild?

James Jennings

Sioux Falls SD

Position: oppose

Comment:

No comment text provided.

Craig Spencer

Sioux Falls SD

Position: oppose

Comment:

I am an aquatic ecologist with a PhD and I've been working on lakes and rivers in South Dakota for the last 30 years as a professor at Augustana University. I am opposed to the de listing of river otter because I don't feel there is sufficient scientific data to justify this. While 40 sightings per year is certainly a good thing compared to the paucity of sightings in the past, there are still large areas of the Big Sioux watershed where no sightings have been reported. Moreover there appear to be no scientific studies quantifying the population size, rates of reproduction, growth, and survival of the various subpopulations in the basin.

Without this type of population data, I believe that delisting is risky. For example, sightings alone could produce erroneously high population estimates, as a relatively small number of animals could result in multiple sightings in multiple locations, given their mobility.

Let's not jeopardize the success of the reintroduction thus far by premature delisting, until such time as there is a more accurate database of population metrics together with a more widespread distribution in eastern SD.

Mark Barker

Hermosa SD

Position: oppose

Comment:

I don't think that there are near enough otters to delist them. Thanks.

Susanne Skyrn

Vermillion SD

Position: oppose

Comment:

I oppose delisting the river otter as a threatened and protected species in SD. There is little knowledge on relative population size. There is little to no scientific data on the population size, density, or health. The only data is 40-42 verified sightings per year across SD. That is not enough to support delisting for these animals. They need more time to rebound from historic low numbers.

Larry Bowden

Hot Springs SD

Position: support

Comment:

As a member of Western SD Fur Harvesters and SD Trappers Associations I support the river otter delisting.

Andrew Olson

Sioux Falls SD

Position: oppose

Comment:

It seems absurd to delist the river otter. I honestly don't understand why you would, at all. Please, please, reconsider this.

Mick Zerr

Sioux Falls SD

Position: oppose

Comment:

A species almost made extinct, is reintroduced, considered sacred by Native Americans, beloved by children, one of most intelligent mammals, a potential tourist attraction should not be offered up for a few license dollars from the few trappers in the state who could care less about the assets of the otter for the state. The state is guessing their numbers at best. Some groups, with thousands of members and followers are planning a massive publicity program if the otter is delisted. SD does not need any more bad publicity.

James Strain

Rapid City SD

Position: oppose

Comment:

SD GFP has never adequately surveyed River otter populations in this state or taken any proactive steps to improve otter habitat and maintain sustainable populations. It appears this proposed action is to appease trappers who accidentally trap otters or sport fisherman who mistakenly believe that otters adversely impact game fish populations. River Otters deserve more protection in South Dakota, not less.

Jerry Travis

Brandon SD

Position: support

Comment:

Guys I think it's time for them to be delisted. I have them in every tributary and river i trap. Setting conibears for beaver it's really tough even putting triggers on far side. Killed one and released 3 this year and jut don't even set where I need to anymore because catching one is inevitable.

Nash Smith

Webster SD

Position: oppose

Comment:

No comment text provided.

Gene Pinkert

Big Stone City SD

Position: support

Comment:

The river otter needs to be delisted as they seem to be everywhere along the north branch of the yellow bank river in grant county. Have seen lots of families of otters during the summer and fall moving around so reproduction is definitely happening.

Philip Neuharth

Menno SD

Position: support

Comment:

It is time to delist, and start managing this wonderful resource. Thanks.

Kris Hoffman

Vermillion SD

Position: support

Comment:

In my line of work I talk to a fair amount of trappers and have been hearing more recently (last few years) about run ins that people have been having with otters. Also, I do know that some trappers are very hesitant to trap beaver because they do not want to catch an incidental otter.

Jenna Glassburner

Sioux Falls SD

Position: oppose

Comment:

At last count there were less than 50 otters in the state, so delisting seems a very hasty and ill-advised move at this point. Please reconsider.

Jerry Herbst

Pukwana SD

Position: support

Comment:

If the their numbers support it that should be the next step.

Kasey Abbott

Sioux Falls SD

Position: oppose

Comment:

I have lived in SD almost all of my 60+ years and am an avid outdoorsman. I have never seen a river otter. I find it hard to believe that there are enough of them to delist as a threatened and protected species.

Michelle Hentschel

Brandon SD

Position: oppose

Comment:

I'm opposed to delisting the river otter because it seems there is not enough data to support their population being stable. Please either wait until higher numbers are observed or until a proper study can be done.

Paul Kuhlman

Avon SD

Position: support

Comment:

I think the de-listing of the bobcat for some East River counties has been a great success and I believe the same could happen with otters. I highly recommend that you follow the GFP advice on this as they have done some excellent research on the topic.

Stephen Humphreys

Pringle SD

Position: support

Comment:

No comment text provided.

Tyler Kari

Bison SD

Position: support

Comment:

No comment text provided.

Vince Logue

Oelrichs SD

Position: support

Comment:

No comment text provided.

Mike Evert

Sheboygan WI

Position: support

Comment:

No comment text provided.

Dana Loseke

Sioux Falls SD

Position: oppose

Comment:

Twenty years ago the Flandreau Santee Sioux tribe introduced thirty- five river otters in Moody County. Today the GF & P study shows an average annual sighting of forty-two otters for the past five years. An increase of seven otter sightings from what was introduced is not indicative of a booming population. Clearly, the data from the GF & P indicates the delisting is not based on science.

As a citizen who has tremendous respect for the work of the department this move to delist is premature at best.

1. Otters are not overrunning our lakes and streams. The GF & P data illustrates that fact.
2. They eat fish in the Blg Sioux which is comprised primarily of carp. If there were more otters maybe we'd get rid of some of the lousy carp.
- 3.. Otters do no economic damage They don't eat crops, they don't cut down trees. They use old burrows from other animals so they don't damage streabanks.
4. They don't eat eggs so they cause no harm to upland game birds.
5. Otters need clean fresh water, vegetated stream banks and food to survive. If South Dakota rivers and streams were not full of sediment we may have a higher population of otters.

Our volunteer organization , Friends of the Blg Sioux River, is working for clean water in the Blg Sioux watershed. Our logo is the river otter. We teach kids that otters need clean water, riparian buffers, and fish for food which is why otters are so rare to see. At school events and school classes we present videos of otters (these are film from other states as we have not spotted an otter in South Dakota to film) enjoying life. As a fan of GF & P I don't think it would be in the best interests of the department to have school children, teachers, and parents learn that these wonderful animals are not protected due to actions taken by this commission.

Suzan Nolan

Rapid City SD

Position: oppose

Comment:

I am opposed to delisting the otter. They are few enough as it is and to put them at greater risk of being trapped makes little sense to me. I think otters should be introduced into western SD and they should not be trapped anywhere nor delisted.

Nancy Hilding

Black Hawk SD

Position: oppose

Comment:

Nancy Hilding,
President
Prairie Hills Audubon

We attach a courtesy copy of our alert on the de-listing of the river otter, which we object to.

We thank Eileen Dowd Stukel & Silka Kempema for their work to protect "at risk" species.

Susan Braunstein

Rapid City SD

Position: oppose

Comment:

No comment text provided.

Jamie Al-Haj

Rapid City SD

Position: oppose

Comment:

I oppose the delisting of the River Otter! The state of South Dakota does not have solid population numbers and arbitrary counting does not justify taking any animal off of a threatened list. Trapping annihilated the River Otter in the past, do not be so irresponsible as to allow history to repeat itself!

(Donald) Peter Carrels

Sioux Falls SD

Position: oppose

Comment:

Delisting the river otter is a premature action. This animal remains relatively scarce in South Dakota. There has been inadequate field research to determine the status of the river otter. We do know that river otters were once common in the state, but as recently as 1977 there was not a single sighting of this animal in South Dakota. The primary reason there is a population at all is because there was a release of about 34 otters by the Flandreau Santee Sioux Tribe in 1998 and 2000. The State of South Dakota must become more undertake an serious effort to restore populations on South Dakota rivers. Until there is a reasonable effort underway the animal must remain protected.

Nancy Hilding

Black Hawk SD

Position: oppose

Comment:

Nancy Hilding
President
Prairie Hills Audubon Society

We attach our second letter on the river otter. This one questions SD GFP knowledge about the river otter at La Creek National Wildlife Refuge and asks for a continued re-introduction effort at the Refuge. To our knowledge last verified sighting was Feb 2018 and an unverified sighting in summer of 2019.

Cheyne Cumming

Rapid City SD

Position: oppose

Comment:

I strongly oppose the delisting of the River Otter. Their numbers do not justify this action. We have none in West River. There is no scientific data to justify this. Habitat continues to be destroyed or compromised. DO NOT DELIST!

Ray Maize

Pierre SD

Position: support

Comment:

I support Delisting the River Otter and would like a trapping season for them. Thank you.

Nancy Hilding

Black Hawk SD

Position: oppose

Comment:

Nancy Hilding
President
Prairie Hills Audubon Society,

I attach our third letter on the otter de-listing, that challenges de-listing criteria and choice of recovery area.

Nancy Hilding
President
Prairie Hills Audubon Society
P.O. Box 788
Black Hawk, SD, 57718
nhilshat@rapidnet.com
605-787-6466
May 3rd, 2020

SD Game, Fish and Parks Commission
Joe Foss Building
523 East Capitol
Pierre, SD 57501

Dear Commissioners.

Below we send you a courtesy copy of our alert on the proposal from SD Game, Fish and Parks to de-list the river otter.

We object to the criteria for the de-listing proposal, we want an estimate of the otter population numbers or more scientific/thorough way of collecting verified sightings, before de-listing moves forward. We want the reintroduction at La Creek National Wildlife Refuge completed and other west river before delisting occurs.

But below (beginning on page 2) find a copy of our alert sent out Sunday night to our e-mail mailing list.

It includes a link where you can watch the video recording of a presentation on the otter that Silke Kempema gave our members via Zoom on April 29th.

=====
Please skip forward to page 2
=====

Help protect SD River Otters - object to their removal from SD's threatened species list and/or request their reintroduction west river.

Take action by **Sunday May 3rd before midnight CT** (by posting comments to GFP on-line for public record) or by Thursday, May 7th 2 pm CT (testify via teleconference or by e-mailing individual commissioners at their 8 individual e-mail addresses)

Scroll down towards bottom of e-mail for details on how to comment to GFP Commission and for a link to watch the recording of our Zoom meeting on otters, (4/29/20) as well as links to other references.



Northern River Otter

Photo by Tom Koerner/USFWS

<https://creativecommons.org/licenses/by/2.0/deed.en>

Discussion of Issues.

SD river otters have been listed as threatened under the SD Endangered Species Act since 1977. They may have once been extirpated from the state and 35 otter were reintroduced by Flandreau Sioux Tribe to the Big Sioux River in 1998 & 1999. SD Game, Fish and Parks staff has proposed to de-list the species, believing it's population distribution east river, indicates recovery. The SD GFP Commission will consider whether to de-list otters (or not) at a virtual meeting May 7th-8th conducted by teleconference.

We object to the delisting on the following major points

1. GFP needs to base delisting criteria on estimates of population numbers & also on population structure, not just on population distribution. GFP is basing the delisting on the population distribution in drainages in the far eastern side of the state.
2. Verified population numbers of otters are still too low
3. GFP should insure the river otter is successfully reintroduced to river(s) in western SD before it is delisted: at least restarting the reintroduction effort at La Creek National Wildlife Refuge

4. Delisting review shows insufficient consideration of the status of the threats to the river otter and their habitat
5. Otters are fun to watch and the wildlife watchers are not less important than trappers. SDGFP should insure that otters are spread around SD in greater numbers & to west river before delisting.

FOR MORE INFORMATION

We believe otter will likely be trapped as fur bearers once they are delisted and wildlife watchers should have otters better distributed across SD, in higher numbers for watchers to enjoy, before more population reduction from trapping starts. Otters are fun to watch. We want some west river.

GFP acknowledges they are now found in the Big Sioux, Vermillion, James, Jorgenson, Little Minnesota, Whetstone, Yellow Bank, Kim Cree/Big Slough river drainages and the Missouri River downstream from Pierre. SD GFP identified a recovery area in far eastern SD. Otters have been found existing in 40% of the sub-basins in the recovery area & breeding in basins that make up 60% of recovery area. Both criteria were met for 2 of 5 years prior to delisting proposal. The highest number of verified otters sightings in SD in any recent year was 42 otters in 2016. Verified sightings for the last 6 years are: 2014 - 33 otters, 2015 - 23 otters, 2016 - 42 otters, 2017- 33 otters, 2018 - 38 otters, 2019 - 40 otters. However more otters will exist than folks are seeing/finding, reporting and that GFP can verify. Half the reports are from Grant, Moody and Roberts Counties. Study of dead otters found, shows they substantially died at 2 years or younger.

Possible west river reintroduction sites are identified by GFP as the Little White River, the Cheyenne and Belle Fourche Rivers. La Creek National Wildlife Refuge and the Little White River have suitable habitat and have had a very small but sort of successful reintroduction. Two otter were reintroduced to La Creek National Wildlife Refuge in 2013. The female died of heart problems but had given birth to a pup before hand. Fate of the male and pup is uncertain, but there were verified sightings (including photos) of single otters up to 2018 and also a not-verified otter sighting in summer 2019. If there is just one otter or two of the same sex, they can't breed.

Otters are associated with beaver, who help create suitable habitat for them in a drainage system. Most otter are currently killed in SD, as incidental take during beaver trapping. The second leading cause of death is being run over by vehicles. Of 117 reported river otters killed in South Dakota from 1979 through 2016, 73% were killed incidental to legal trapping activities; 15% of the 117 reported river otter mortalities resulted from being struck by vehicles. SD otter eat fish, frogs and crayfish and live in aquatic systems: streams, ponds, marshes but they travel cross country from one surface water to the other. They need vegetation along the banks for habitat. Water systems located east river can see change to their edges & size as water levels rise and fall due to variance in rain fall or due to drainage tiling. We face era of climate change & uncertain weather. We question if they should disclose more info on status of the threats to otter, especially from climate change, water pollution (especially from agriculture) and wetlands drainage. In the west river prairie of SD beavers are hunted 365 days. We need to insist on a reduction in the level of beaver trapping west river, to reduce the human predation on any otters reintroduced.

Trout are a non-native introduced species, the Black Hills native fishes were too small for fishing and our Black Hills streams are stocked full of exotics. Trout are difficult for otters to catch (trout swim too fast). We should request that GFP explore managing some stream(s) in Black Hills for fish species that otters can catch, so we can re-establish them in at least one drainage in the Hills.

THE FUTURE - MORE WORK WILL BE NEEDED

If we fail to prevent the delisting of the otter, we must work to delay the immediate approval of an otter fur bearer season and once one is approved make sure it is very small. Please note most otters are killed currently are killed via incidental takes during trapping. Such death can involve drowning under water while restrained. We can also work to protect beavers. Percentages of otter death by type of trapping are: 53.7 % for beaver trapping, 32.4 % for unknown trapping, 8.8 % for raccoon trapping, 2.3 % for fish trapping , 1.4% for mink trapping and other 1.4%

We need to insist on reintroduction to La Creek National Wildlife Refuge or to the Little White River, working with either GFP, USFWS and/or Rosebud Sioux Tribe. We can work for introductions on Cheyenne & Belle Fourche Rivers, working with GFP and/or tribes. The work to protect the otter will not be over on May 7th, no matter what happens - so write in support of otter recovery and west river reintroduction, even if you miss the May 3rd or May 7th deadlines.

HOW TO COMMENT

You can comment on any proposed rule change (or anything else) in writing by midnight CT of May 3rd
Post comments on line at: <https://gfp.sd.gov/forms/positions/>

Or you can comment by teleconference on the afternoon of the 7th.

Teleconferencing details are on this web site (<https://gfp.sd.gov/commission/information/>)

The public hearing will begin at 2:00 p.m. CT. The conference call number available for the public to call in starting at 2:00 p.m. CT to provide comments is 1-866-410-8397; Conference Code 5451787643#. The public is encouraged to call in from their home, but is encouraged to get off the phone after testifying to not clog up the lines. You can livestream meetings at: <https://www.sd.net/>

You can testify for 3 minutes on any subject during the "open forum" and for 3 minutes during the rule making hearing on each rule up for review (that is when you testify on the otter de-listing or other rules up for finalization). Rules up for finalization besides River Otter Delisting include:
, Archery Deer Season, Youth Waterfowl Season, Youth Pheasant Season, Flathead Catfish – NE & SD Border Waters. Normally comments on rule making come before the open forum. The River otter is currently listed as the 7th rule to be considered, but order can change at discretion of the Commission.

Link to see the Commissioner's contact info
<https://gfp.sd.gov/commission/members/>

Here are the e-mails of Commissioners serving in 2019, you can e-mail them directly at any time, but your e-mail will not go into the official records of GFP, unless you also post it at: <https://gfp.sd.gov/forms/positions/>.

Late submissions end up in the next months "Commission Book".

You can call them at home, but please be polite and respectful.

MaryAnne.Boyd@state.sd.us, Jensen, Gary
<Gary.Jensen@state.sd.us>, Russell.Olson@state.sd.us, Doug.Sharp@state.sd.us, Travis.Bies@state.sd.us,
Robert.Whitmyre@state.sd.us, Jon.Locken@state.sd.us

REFERENCES

*We had a Zoom meeting Wednesday, 4/29/20)by Zoom,
Topic: **South Dakota's River Otters***

Time: Apr 29, 2020, 6:30 PM Mountain Time

Speaker: Silka Kempema of SD Game, Fish and Parks (GFP) Wildlife Diversity Program

Link to recording of the meeting (already happened)

<https://us02web.zoom.us/rec/share/4ZBrI-6u2WhJYrfc5UPEfasvMtjbX6a8gCBKrqFczk8oRnoPBZv5F7PbJmyTrwuE>
Password: 5K%KE1B&

Nancy was a little late starting the recording and missed the first three slides, which included the title slide, a slide titled

Mustelid - which had 4 characteristics listed (carnivore, long body, short legs, scent glands) and a slide titled Biology, which had 3 points.- (adapted to life in water, indicator of water quality, associated with beaver.)

To read de-listing proposal

https://gfp.sd.gov/UserDocs/meetings/PRO_2020_River_Otter_Delisting.pdf

Link to SD GFP's status review for endangered and threatened Species. -

See page 122 for the North American river otter section, page 127 for recovery criteria/goals:

<https://gfp.sd.gov/UserDocs/nav/status-reviews.pdf>

"Determination of river otter (*Lontra canadensis*) distribution and evaluation of potential sites for population expansion in South Dakota", 2011- 2015,

See page 69 for Melquist's recommended parameters to be met before de-listing and also reintroduction recommendations

<https://gfp.sd.gov/images/WebMaps/Viewer/WAP/Website/SWGSummaries/FINAL%20REPORT%20Melquist%20River%20Otters%20T-55.pdf>

Link to GFP's 2012 SD Otter Management Plan

<https://gfp.sd.gov/UserDocs/nav/OtterPlan2012.pdf>

SD GFP Commissions March 5th meeting had a discussion of the proposed delisting..if you go to the meeting archives you can scroll through page till you find "Proposal River Otter Delisting" with small image of an audio horn to the right

<https://gfp.sd.gov/commission/archives/>

SD Endangered Species laws

https://sdlegislature.gov/Statutes/Codified_Laws/DisplayStatute.aspx?Type=Statute&Statute=34A-8

SD Endangered Species Rules

<https://sdlegislature.gov/Rules/DisplayRule.aspx?Rule=41:10:02>

2020 SD House concurrent resolution to de-list otter and manage as a harvested furbearer (resolutions are not law, just legislative suggestions)

http://sdlegislature.gov/Legislative_Session/Bills/Bill.aspx?Bill=HCR6014&Session=2020

Best Management Practices for Trapping River Otter, Association of Fish and Wildlife Agencies

https://www.fishwildlife.org/application/files/8015/2105/3073/Otter_BMP_2014_F.pdf

US Forest Service North American River Otter - A Technical Conservation Assessment, 2006

https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5210168.pdf

The Black Hills Pioneer had an article on the proposed delisting, February 29th, 2020. <https://www.bhpioneer.com>

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End of our alert

Thanks,



Nancy Hilding, President, Prairie Hills Audubon Society

Nancy Hilding
President
Prairie Hills Audubon Society
P.O. Box 788
Black Hawk, SD, 57718
nhilshat@rapidnet.com
605-787-6466
May 3rd, 2020

SD Game, Fish and Parks Commission
Joe Foss Building
523 East Capitol
Pierre, SD 57501

Dear Commissioners,

This is our second letter on the river otter, Our first was a courtesy copy of our alert on the de-listing proposal.

We include below text from the SDGFP delisting proposal found at
https://gfp.sd.gov/UserDocs/meetings/PRO_2020_River_Otter_Delisting.pdf

The delisting report says:

" Melquist reported in 2015 that river otter distribution included the following: Big Sioux, Vermillion and James River drainages, Jorgenson River, Little Minnesota River, Whetstone River, Yellow Bank River, Jim Creek/Big Slough and the Missouri River downstream from Pierre (Melquist 2015)."

We include text from the Status Review of 2018 that can be found at

Page 124 and pages 125-126 and :
<https://gfp.sd.gov/UserDocs/nav/status-reviews.pdf>

Conservation / Management Considerations:

"Known threats to river otters in South Dakota include incidental trapping and road kills. Of 117 reported river otters killed in South Dakota from 1979 through 2016, 73% were killed incidental to legal trapping activities; 15% of the 117 reported river otter mortalities resulted from being struck by vehicles (South Dakota Department of Game, Fish and Parks, unpublished data). Degradation of streams, loss of riparian habitat and seasonal variations in water levels also threaten long-term population stability. The impact of agricultural chemical run-off is unknown. A year-round beaver trapping season west of the Missouri River and a focus on non-native trout management in Black Hills streams will impair statewide recovery of river otters. Due to these issues and evidence of more suitable habitat in eastern South Dakota, the focus of recovery is on watersheds within the eastern part of the state."....

"Suitable reintroduction or translocation sites to address river otter depredation complaints were selected based upon riparian habitat, water permanence, available prey, evidence of current beaver activity and banks with suitable resting sites (Melquist 2015). Potential reintroduction sites were located on the Cheyenne, Belle Fourche and Little White rivers. No evidence of recent otter occurrence exists in the areas selected for reintroduction. Note that current conservation challenges west of the Missouri River (as listed above) impair recovery at these sites. Translocation sites were recommended on the James, Missouri and Vermillion rivers. At least one site was recommended in each administrative Wildlife Division region of SDGFP

Two incidentally captured otters (one male and one female) were radio-marked and released on the Little White River Game Production Area in Bennett County (Figure 1) on 14 126

November 2013 to further evaluate habitat suitability on the Little White River (Melquist 2015). Radio contact with the male was last obtained on 25 March 2014. The female occupied both the Little White River and Lacreek National Wildlife Refuge giving birth to at least one pup on the refuge during the spring of 2014. The adult female was found dead on 19 January 2015. Hypertrophic cardiomyopathy is the suspected cause of death (U.S. Geological Survey, National Wildlife Health Center Diagnostic Services case report #26185). Portions of the Little White River and the Lacreek National Wildlife Refuge have suitable year-round otter habitat."

(Emphasis added)

This story on the reintroduction effort at La Creek National Wildlife Refuge, seems not to have been updated since Melquist's report ended in 2015. It seems when he left he had no proof of continued otter presence at the refuge. It seems GFP has not been communicating since then with the La Creek NWR.

I provide two quotes from e-mails from Todd Schmidt the refuge manager. I have forwarded these e-mails to Silka Kempema. Below find two e-mail texts dated May 1st from Schmidt and one on May 3rd from Tom Beck, a Game, Fish and Parks employee :

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From: "Schmidt, Todd" <todd_schmidt@fws.gov>

Subject: Re: [EXTERNAL] Can you give me an update on river otters La Creek?

Date: May 1, 2020 at 1:26:23 PM MDT

To: Nancy Hilding <nihilshat@rapidnet.com>

"We had sightings about every year after the relocation up until February of 2018. Not sure if it is more than one, we never had more than one in a picture. And nobody on staff ever saw more than one at a time after the female died. You might contact Tom Beck the Bennett County Conservation Officer with the GFP and he might have more info on nearby sightings.

His number 605-381-6433

or email tom.beck@state.sd.us

Todd Schmidt

Lacreek National Wildlife Refuge

Martin, SD

Office: 605-685-6508"

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"Hi Nancy.

The last confirmed sighting of a river otter was in February of 2018. We have a few nice trail camera pictures of an otter during that winter. We have not seen sign of an otter or heard of any reports of an otter at Lacreek NWR since that time period.

Yes, we are currently teleworking, sorry we are not answering our office phone.

Todd

Todd Schmidt

Lacreek National Wildlife Refuge

Martin, SD"

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This is a May 3rd e-mail from Tom Beck

From: "Beck, Tom" <Tom.Beck@state.sd.us>

Subject: Re: sightings of river otters at La Creek

Date: May 3, 2020 at 8:18:35 AM MDT

To: Nancy Hilding <nihilshat@rapidnet.com>

Nancy

We have not had any sightings on or around LaCreek National Wildlife Refuge for over a year. I'm not seeing tracks or slides, eaten fish, or other signs that any are present anymore, which is unfortunate.

Tom

Tom

=====

At our April 29th Zoom meeting on the River Otter, Dan Snethen, a biology teacher at Little Wound High School, in Kyle reported that he has seen a river otter near La Creek (but not on La Creek) on some not specified date, but Dan knew someone who saw a river otter in the Summer of 2019. He said the name of the person, but I don't remember it. He said this person hunts bears with Melquist.

It thus seems the Fall 2018 determination by SD GFP that Little White River has no recent otter occurrence may need to be re-examined. At the very least otter(s) seem to been noticed with verified sightings at La Creek National Wildlife Refuge up till 2018 (including photos).

As the story is that a male and female were reintroduced in November 2013 and the male radio emissions were lost in 2014 and the female died of heart troubles in early 2015 and she gave birth to a pup (fate unknown). It is possible that we have two males out there or one male or one female and they are surviving but not able to breed.

There is suitable habitat at La Creek NWR and along the Little White River, including on the Rosebud Reservation.

SD Game, Fish and Parks needs to prioritize very quickly adding some more river otters to the La Creek NWR population and perhaps Rosebud Sioux Tribe might join Flandreau Sioux Tribe in helping with otter reintroduction.

Prairie Hills Audubon Society is located west River and we would like to be able to watch river otters at La Creek or at other rivers in western SD. We don't want the river otter delisted until this is accomplished. However if the river otter is delisted we want no trapping or hunting season West River until some reintroductions west river are successful. Why do just east river people get to watch or trap otters?

We ask for SD GFP to check with tribes to see what cultural significance the otters have to tribes (if any), especially as Flandreau took the initiative to re-introduce them. You should do that check before delisting.

Thanks,



Nancy Hilding
President
Prairie Hills Audubon Society

Nancy Hilding
President
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P.O. Box 788
Black Hawk, SD, 57718
nhilshat@rapidnet.com
605-787-6466
May 3rd, 2020

SD Game, Fish and Parks Commission
Joe Foss Building
523 East Capitol
Pierre, SD 57501

Dear Commissioners,

We question the delisting criteria chosen by SD GFP for the river otter, back in 2018. We object to them as insufficient and incomplete. We object to having only a recovery area of the far east side of South Dakota.

These criteria are expressed on page 127 of the Status Review:

"Delisting of the river otter will be recommended when the following conditions are met:

- _confirmed reports of reproduction are documented in three of the five basins (60%) within the recovery area, AND
- _within each of these basins, the presence of river otters has been documented by verified reports in at least 40% of the subbasins.

Both of these criteria shall be met during two of the five years prior to proposed delisting."

- Wayne E. Melquist, Ph.D. , CREX Consulting , was hired to write a report for SD GFP's Wildlife Diversity Program a report titled: " **FINAL REPORT** Determination of river otter (*Lontra canadensis*) distribution and evaluation of potential sites for population expansion in South Dakota, 1 October 2011 - 30 January 2015", dated May 2015 .

On page 69-70 he recommends more strict de-listing criteria than SD GFP chose & he also offers a choice of recovery goals - recovery in just eastern SD or recovery in both eastern & western SD. But he suggests that to recover both eastern & western SD you need to bring in out-of-state otters due to limited otter supply in SD & also GFP would need to reduce beaver trapping west river.

"RECOMMENDATIONS

Parameters for Delisting

Demographic parameters, including size, structure, and distribution of the South Dakota otter population will be necessary for delisting to go forward and for any consideration of a harvest. I recommend that biological data (e.g., sex, age, reproductive condition, presence of parasites) continue to be collected from dead otters recovered by SDGFP. Age structure of this "unintentional harvest" can be useful in gauging the reproductive health and dynamics of the otter population. Trend data and the expansion of otters into previously unoccupied areas can provide insight into the health of the existing population and the suitability of the habitat in previously unoccupied areas.

While biologists still haven't been able to develop a method to accurately estimate population density based on survey data, distribution and population trend data can be obtained through some variation of bridge sign surveys. I would recommend that standardized winter bridge sign surveys be established.

Survey options could be similar to those used in Nebraska, where they don't leave the bridge (Wilson 2011), in Ohio, where they survey 300 m upstream and downstream from the bridge (Prange 2011), or the methods employed by Shardlow et al. (2009) in Kansas. I would also encourage exploring survey options used in other Midwestern states in an effort to find an appropriate survey method suitable for South Dakota.

Need for reintroductions to expand otter populations in South Dakota

I believe there are options available to SDGFP for increasing the density and expanding the distribution of otters in the state. The 2 options offered here are based on different assumptions for recovery goals. Option 1 is based on the assumption that otter restoration in only East River streams is necessary to meet recovery goals.

This option would focus on using only resident otters to augment existing populations on the James River and Vermillion River drainages. The source of otters for this augmentation would be the Big Sioux River drainage and tributaries of the Minnesota River. Available otters could be those incidentally live-trapped, conflict otters that require moving, or otters intentionally captured for the purpose of moving them. This option makes sense if a determination is made that West River streams are neither part of the recovery effort nor necessary for achieving recovery goals.

Option 2 is based on the assumption that otter restoration in East River and West River streams is necessary to meet recovery goals.

There probably wouldn't be an adequate supply of otters available in South Dakota to augment small East River populations and establish viable breeding populations in West River streams. Therefore, this option would require purchasing otters from a source or sources outside of South Dakota for release at previously identified locations on the Cheyenne River, Belle Fourche River, and Little White River in order to expand the otter population west of the Missouri River. However, beaver harvest regulations, as described below, should be changed or the restoration effort may be fortuitous. Also under this option, I would recommend that East River streams continue to be augmented, but only by resident South Dakota otters. Kiesow (2003) outlined a reintroduction protocol and recommended a release of 120 otters in the state, with a minimum of 100. While the number may seem somewhat arbitrary and based on releasing otters in 5 streams, most parts of the protocol appear reasonable. I recommend a review of past successful restoration efforts in other states be combined with Kiesow's protocol and recommendations prior to establishing the number of otters for release in the West River streams."

Emphasis added.

We don't see an estimate by SD GFP of what number of otters is needed for a viable population. We believe that distribution goals, rather than population numbers was chosen as it is difficult to count otters and perhaps SD Wildlife Diversity program has a limited budget. But we are under the understanding that if you substitute distribution for population numbers, you need a more scientific and thorough method of counting otters than was used.

Sincerely,



Nancy Hilding
President
Prairie Hills Audubon Society