

Public Comments

Administrative Rules Review

Jessica Necklace

Wagner SD

Position: other

Comment:

Our family utilize the Missouri River a lot on the Yankton Sioux Reservation. I feel that Native Americans within Boundaries of YST should not have to pay entrance fees because the land and waterways join tribal lands. This is one benefit the Native Americans could utilize their land without having the fee.

Fall Turkey

James Elsing

Lemmon SD

Position: other

Comment:

See attached letter.

John Janecke

Winner SD

Position: oppose

Comment:

This is an addendum to my previous email regarding the closing of Tripp County to fall turkey hunting. Even though I have attempted to find out the reason for NOT having a season, I have been unable to do so.

Yesterday, I was going fishing and saw at least two (2) HERDS (not flocks) of wild turkeys. Minimum of ten (10) each. I wish that I had a camera to send you photos...I use a flip phone, so any photos would have been realistically useless.

I am apposed to closing Tripp County to fall turkey hunting. The turkey population appears to me to be greatly adequate for residents to hunt.

Nonresident Landowner Owned Land License Application

Neil Hawthorne

Anchorage AK

Position: support

Comment:

I have hunted, as a resident for 20+ years and as a landowner nonresident for maybe 20 years for deer, turkey and antelope. I pay your taxes on 400 (now 900) acres in Custer county and feel that my license should not be much more than twice what I used to pay for a deer license. This would be, of course, on my own land. Thank you

Adam Golay

Sioux Falls SD

Position: oppose

Comment:

If non resident landowners want to hunt deer west river they already have a process for them to get tags. That's why there is a west river special buck non resident app that they can apply for. They won't draw every year but the privilege of hunting deer in South Dakota every year should only be for residents. If someone wants to hunt deer every year & buy land in another state that they don't live in then they should consider buying land in a state that has a lot more deer in it than South Dakota. There needs to be incentives to stay in South Dakota & hunting privileges are one of them. Plus more non residents hunting our big game takes away an opportunity for a resident to hunt big game in the state he or she lives in.

Jim Gruber

Estelline SD

Position: other

Comment:

look, if you are going to do this for west river landowners.. then do the same for east river non resident owners also... why just west river?

Casey Foster

Sparks, Ne 69220 NE

Position: support

Comment:

I am one of the non-resident landowners that will be eligible for one of these permits. I pay about \$8000 a year in SD taxes. So, I would like to see the fee lower but believe \$140 is a fair price.

Hale Kreycik

Douglas WY

Position: support

Comment:

I am of the opinion that this proposal is a wise one. As a non-resident landowner, I see value and especially fairness since I am paying several thousand dollars in real estate taxes to S. D. each year. Any incentive encouraging visitors to the State can only result in additional income for small business, generate sales tax revenues, and be of an overall benefit.

In addition, I suggest you consider a procedure for the landowner to be able to have the license issued to an immediate family member as well, especially youngsters under a certain age. Anything that can be done to encourage and recruit a new hunting population would be a positive for all concerned, including wildlife. Thank you for the opportunity to comment!!

Eric Gonzale

Glen Burnie MD

Position: support

Comment:

As a non-resident landowner of 160 acres in Fall River, I completely support this action. Many states have similar rules - for example, in NY non-resident land owners are allowed to hunt their land provided they own a minimal 50 acres. I believe WY has a similar rule, as does MO, ME, OH and many others...

Other

Raymond Martinmaas

Orient SD

Position: other

Comment:

Disabled hunter access

Pamela Scouten

Pierre SD

Position: oppose

Comment:

I cannot believe we are approving such a large budget going towards promoting the increase in license sales to bring in more out of state hunters. The reason why those brood report numbers deterred people is because THERE ARE NO BIRDS left to hunt. I have always been an avid bird hunter and not from lack of trying, but I did not take a single pheasant last year. Unless you own land or you pay a game farm \$100+ PER BIRD, you cannot pheasant hunt in this state. That money should have been spent to improve public hunting so people actually had a chance to hunt. Another disappointing decision for SD hunting.

Greg Fecho

Mpls MN

Position: support

Comment:

Hello, in regards to marketing plan and elimination of brood count.

Eliminating the BCS will come back and bite you, non resident hunters like myself have relied on that info to plan our hunts, I have hunted Chamberlain west to Presho, up for a number of years by Ipswich , and the last number of yers by Miller, Highmore.

You have to give us some guage to plan our destination, for the cost of a 3 day trip for NR, 120.00 license, lodging, food, fuel, pay farmer , etc can easily hit 600- 1000.00 per hunter, that is a lot of money to drive 6 hours and not see a bird (which has happened the last couple of years)help us, don't hide facts.

2) youth hunting, google " Greg Fecho hunting" story down by Mpls Outdoor writer on getting kids involved. When I go to a steak house, bar, gas station in SD during hunting season, u never see a group of NR with kids , never, the reason , COST, very few people can bring their 2 sons along for 3 days and spend 2000-2500 all in , it is outrageous. Come up with a NR family license, a cost that helps bring down the cost.

3) give a option for 3 , 3 day hunts, the 5 day is worthless , most people can't hunt 5 days for reasons of work, family, etc. if you offered that license (or something similar) you would I bet get some of those hunters to come out 3 times vs 2.

Don't get me wrong, I love SD, I rented a camper last year and drove west to Pollack, SD , met a rancher and spend 3 days on back of a horse driving cattle , went from there to Gregory helped cook at a archery deer camp, from their to Wagner where I met up and hunted with friends from MN and Wagner folks, 23 days I was gone, going again this year.

Feel free to call, love to give u input on NR hunters opinion.

Thanks gf

Alex Petrik

Lake Andes SD

Position: oppose

Comment:

I believe this should not be passed as the money from the passes should be used to manage, maintain, and operate our parks.

Gregory Nowak

Armour SD

Position: oppose

Comment:

The decision to end the South Dakota Pheasant Brood Survey is extremely disappointing to me. It is sad to see my state making decisions based on some "marketing" scheme and discontinuing a 70 years old South Dakota tradition. The state takes in \$218 Million from Pheasant hunters, can spend \$700,000 during the first year of it's marketing plan but can't spend \$80,000 to \$90,000 to complete the survey. Give me 15 mins worth of training, a route in south central SD, the time you want it surveyed and I will do it for free!

Sharon Blais

Sioux Falls SD

Position: oppose

Comment:

Quit killing all of our wildlife. All animals play an important role in our ecosystem.

Curt Rich

Rapid City SD

Position: oppose

Comment:

Doing away with the pheasant road survey is a grave mistake. This data is a valuable tool to measure the effectiveness of management programs . . .and to do away it is irresponsible and short sighted . . .if this is the new philosophy of the GF&P then may there need to be an evaluation of those responsible for this policy

Paul Lepisto

Pierre SD

Position: other

Comment:

Please see the attached comments from the SD Division of the Izaak Walton League of America urging reconsideration of decision to stop conducting annual pheasant brood survey.

Bruce Knowlan

Webster SD

Position: other

Comment:

Is it true that Sd pheasant hunting isn't now a business not a sport ?

River Otter Season

Steven Peterson

Ramona SD

Position: support

Comment:

The river otter is a valuable resource to the trappers of South Dakota. I am 100% in favor of our South Dakota outdoor enthusiasts being able to tag and keep the otter they catch.

Jerry Herbst

Pukwana SD

Position: support

Comment:

If their numbers support the a season then go for it. Conservation efforts have supported and expanded wildlife greatly over the years. One thing you can bet on is the antis did nothing to help really, just a thorn in the side of success.

Anne Fuehrer

Sioux Falls SD

Position: oppose

Comment:

We have worked to bring these creatures back and now you are opening them up so hunters have something else to make money on. You have given no fact based reasoning to remove protections for otters. Aren't these otters sacred to the Lakota? You continue to cater to the trump administrations need to remove protections for wildlife. All to the detriment of our ecosystems.

Randy Ristesund

Sioux Falls SD

Position: oppose

Comment:

Not for killing for fun

Kim Benning

Redfield SD

Position: oppose

Comment:

Trapping is inhumane and should be outlawed. How can anyone with any humanity in their body think trapping is good. Those poor animals suffer and die a horrific death. Save the otters!

Sharon Rose

Rapid City SD

Position: oppose

Comment:

Inhumane, let's work on getting SD back on track since COVID and leave indigenious wildlife alone.

Peggy Mann

Aberdeen SD

Position: oppose

Comment:

Leave the River otter alone. Stop killing.

Jeanie Dumire

Hot Springs SD

Position: oppose

Comment:

Please stop killing these animals

Theresa Giannavola

Aberdeen SD

Position: oppose

Comment:

I do not agree with trapping this animal or any animal for that matter, nor removing it from protected status. Most states have banned trapping in this century. We just got them back in our state and they pose no threat to farmers. Leave them alone and let nature be wild.

Rochelle Von Eye

Plankinton SD

Position: oppose

Comment:

Must we kill every living creature? I live on a farm and appreciate nature. I do not think it is necessary to kill for the sake of killing. ??????????????

Nancy Smidt

Sturgis SD

Position: oppose

Comment:

It is so rare to see an otter in SD, I have actually only seen 1 in the last 20 years I have paddled our creeks and rivers. It was such a mind blowing honor to have seen him. Please do not trap these beautiful, fun loving creatures. They are a true delight to see.

Darlene Finberg

Redfield SD

Position: oppose

Comment:

PLEASE leave them alone

Kathy Mills

Custer SD

Position: oppose

Comment:

Due we really need to trap, hunt, everything in this state. Can't be an environment first state? Next we will be paying 10 bucks a paw for otters! I understand, having come from a hunting family but we refuse to provide better habitats..just bounty and shoot.

Tammy Jungen

Waterown SD

Position: oppose

Comment:

The relatively rare population of river otter in SD must be protected. I strongly oppose the opening of a trapping season. The native population of them is not known. Also, with clean water needs, the population is unlikely grow due the deplorable conditions of SD waterways.

It is unconscionable to even consider a trapping season at this time with so little know of the current population and health of this reintroduced native species.

If this comes from a financial aspect, you would draw more tourism business by watching them, not trapping them.

Please do not support this plan.

Klara Parks

Piedmont SD

Position: oppose

Comment:

Exactly what is wrong with this state??? I very much oppose what appears to be a plan to get rid of River otters once again. It seems the wonton and unnecessary killing of wildlife in this state is just business as usual. We have to endure a second year of the horrible and cruel Nest Predator program and now this. I am a life long resident of this state and have never been ashamed of that until now. What a sad sorry state.

Tammie Mohr

Brookings SD

Position: oppose

Comment:

I do not support the killing of these rare and precious River Otters. There are plenty of other opportunities for "families to get outside" and there are more conservation-focused ways and more economical ways to generate income; such as through education tours and encounter experiences. Fund preservation for once.

Tasha Redday

Brookings SD

Position: oppose

Comment:

This is wrong. You just spent so much time trying to bring these guys back! Now you are going to allow trappers to bring their numbers to an all time low again. Stop this insanity!

David Goronja

Howard SD

Position: oppose

Comment:

Save the otters

Kim Duke

Sioux Falls SD

Position: oppose

Comment:

Please leave the river otters alone. They are so helpful to the environment. They are listed as a protected species for a reason. If this happens you will just be killing harmless but yet very important animals. Trapping of any kind is so cruel. PLEASE do not delist the river otters!!

Dana Zoelle

Brookings SD

Position: oppose

Comment:

Save the Otters!!

Cristin Holm

Rapid City SD

Position: oppose

Comment:

Please continue to protect the river otter!

Dianna Torson

Brookings SD

Position: oppose

Comment:

Families should go outside to bike, hike, horseback ride and other non-lethal activities. Killing these beautiful creatures is immoral!

Suzanne Hodges

Rancho Cordova CA

Position: oppose

Comment:

Historically, river otters were, and still are, a sacred species for us as Lakota people, as well as for many indigenous nations in North America. In the annals of Societies of the Plains Indians, the river otter is shown to be held in the highest esteem, with more than 40 references found throughout the documentation,"Historically, river otters were, and still are, a sacred species for us as Lakota people, as well as for many indigenous nations in North America. In the annals of Societies of the Plains Indians, the river otter is shown to be held in the highest esteem.

Juie Berry

Vermillion SD

Position: oppose

Comment:

The river otter is a very important animal for healthy wetlands, (and other habitats). It took a lot of work to get these river otters here, and it is important for the beauty of this state that they stay here.

Dana Loseke

Sioux Falls SD

Position: oppose

Comment:

No comment text provided.

Shaun Grassel

Reliance SD

Position: oppose

Comment:

I would hope that the GFP would only allow harvest in areas where otters are abundant, such as the James River and Big Sioux River watersheds. I do not oppose otter trapping in eastern SD but I do have concerns about the impacts of harvesting otters from small, disjunct populations that might occur along or west of the Missouri River. I am not in favor of a statewide season. Please leave the counties along the Missouri River and all other west river counties closed.

Julie Hagen

Britton SD

Position: oppose

Comment:

I oppose having a river otter season. This mammal would be a pleasure to see and I can't imagine why they would need a hunting season. If you don't even have an accurate account why would you feel you could kill any. I strongly disagree with your over ruling of public comment.

Kenifer Meadows

Rapid City SD

Position: oppose

Comment:

Otters are essential to the ecosystem balance and keeping the rivers healthy and clean. Besides the obvious moral benefit of healthy waterways, there are financial benefits as well.

South Dakota's tourism relies on natural attractions. Covid is driving people outdoors because it is one of the only safe places to play. This means that SD's outdoor adventures will only increase in the next few years.

Decaying the waterways will decrease the value to the majority of river goers for the limited benefit of the few.

Christina Yates

Jackson OH

Position: oppose

Comment:

I oppose trapping river otter. They are a protected species and should remain so.

Ray Starling

Wilmington NC

Position: oppose

Comment:

These are an endangered species. Their population and cultural value is more important than pelts.

Michael Kurtz

Lower Brule SD

Position: oppose

Comment:

Protect the otter, save the ones that are free. Otters are sacred to the Lakota, let them live freely. At this time the population needs to continue to increase. No trapping.

Gavin Lammers

Hartington NE

Position: support

Comment:

I would suggest moving the season start date to make sure that threat from the river otter is prime

Paul Lepisto

Pierre SD

Position: oppose

Comment:

Please see the attached comments from the South Dakota Division of the Izaak Walton League of America.

Susan Braunstein

Rapid City SD

Position: oppose

Comment:

I don't believe there is significant scientific data to support the river otter season. Please just leave the otters to thrive in their recovery. It is not humane or necessary on any level.

Gena Parkhurst

Rapid City SD

Position: oppose

Comment:

Please do not create a river otter hunting season. After being wiped out by European immigrants, the otters were re-introduced by the Santee Sioux Tribe's initiative. It is far too early for a hunting season. These creatures are just beginning to re-populate South Dakota's waterways.

Expand otter habitat to the Black Hills and other areas.

Incidental take in beaver kills is unacceptable and should not be legitimized by a hunting season. Create a contest for inventors to figure out how to keep otters out of beaver traps.

Thank you for considering these comments.

Use of Parks and Public lands

James Van Loan

Rapid City SD

Position: oppose

Comment:

After reserving a Big Sioux campsite for \$55 I cancelled it 18 days before the reservation and was charged \$27.50. If you think this is a way to attract visitors by charging 50% cancellation fee it is nothing a private campground could do. It is excessive!!!!

Dan Kotab

Dante SD

Position: oppose

Comment:

No comment text provided.

Robert Bennett

Lake Andes SD

Position: oppose

Comment:

Commenting regarding YST fee exemption

I do not support this. Why not allow free entrance for everyone to have greater outdoor recreation and more education opportunities that the park provides? Why only the YST? Why not everyone like it used to be?

Corey Irwin

Lake Andes SD

Position: oppose

Comment:

They are a "sovereign nation" if they want to be involved in state functions then they should pay for their park entrance just like the rest of us. If they want to be involved in any of the joys of the river and its activities then they should pay what we pay or they should find an area that is on "their lands" aka a true reservation. The area that is called the Yankton reservation is not an actual reservation. Every member should be required to pay for their entrance because they are part of this STATE.

Ryan Frederick

Lake Andes SD

Position: oppose

Comment:

I am writing in regards to the state giving the tribes free passes into the state parks. Why as tax paying individuals do we need to pick up the extra money that they get for free. We pay to enter and to use these areas, so should everyone else, including the natives. This is not a right, this is a privilege we pay for!! Please keep it fair to everyone, not just a few!!

Karen Soulek

Lake Andes SD

Position: oppose

Comment:

Regarding no-fee access provided to Yankton Sioux Tribal members, we feel that the South Dakota STATE Parks should be equally accessible to all residents regardless of who you are. The fees are already reasonable and provide access for an entire year to ALL state parks, so we do not feel that there should be an extra exemption to Tribal members - especially since the GFP already grants an exemption for religious purposes. Every entrance fee obtained is necessary to pay for the costs of upkeep and yearly maintenance of the State Parks.

Marsha Johnson

Lake Andes SD

Position: oppose

Comment:

Ridiculous!!! I work hard for my income and pay my taxes!!! Why would you ever think this is even right!! Tired of giving giving and giving!!!! Not even an option! Why would I have to pay to use state facilities and someone else doesn't!!! Because they are native! No thought we were all equal, then treat them that way!!

Greg Hubbard

Lake Andes SD

Position: oppose

Comment:

Yankton Sioux Tribe members free park usage around Pickstown. NO WAY!! I live along the river in that area and regularly have to pick up bags & bags of trash left by Tribal members. Many do not respect the environment and should be given benefits other residents won't have. Your park employees will be picking up dirty diapers, liquor bottles, food wrappers, etc.

John Kokesh

Wagner SD

Position: oppose

Comment:

I'm not Native American and I live in the bounds of the Yankton Sioux Reservation so based on my heritage my family's is being discriminated against. The SDGFP must not be concerned about creating "greater access" for my family and is basing that discriminating decision off our race/religion and that is exactly what we are allowing to divide our country at this present time. Do not pass this if you truly believe in equality for all American, native or otherwise.

Jmaes Stone

Lake Andes SD

Position: support

Comment:

I am in support of the proposed park entrance fee exemption for Yankton Sioux Tribal members. I suggest adding the White Swan Use Area.

Jonelle Drapeau

Wagner SD

Position: support

Comment:

Greetings, I would like to encourage the committee to vote full access for the Yankton Sioux Tribe and it's members. This would be a huge step forward in mending relationships between the state and the tribes. I can see this action of solidarity gaining full support by all parties and gaining national headlines as they see a move to acknowledging the importance of water to the Native American culture and peoples. My hats off to all of you that are involved in such proposal and the consideration of the proposal. Thank you.

Jonelle Meyer

Wagner SD

Position: support

Comment:

As a non-enrolled member of any tribe, I think that Tribal members should be able to access the parks at no cost. They take pride in the care and love for water and see it as something very sacred. I feel that this kind of actions would benefit the relationship between state and tribal government.

Alexis Rouse

Marty SD

Position: support

Comment:

No comment text provided.

Helen Fischer

Lake Andes SD

Position: support

Comment:

No comment text provided.

Trinia Lerew

Sioux Falls SD

Position: support

Comment:

I support giving all Yankton Sioux Ihanktowan members free park passes into and around the Pickstown recreation areas. My family and I have been swimming, fishing, picnicking in and around these places our whole lives. I grew up on the river, going to the river and would appreciate having the right to do so without having to pay a fee or a fine. Thank you for your time and consideration.

Etraya Olson

Vermillion SD

Position: support

Comment:

No comment text provided.

Garrett Cournoyer

Vermilion SD

Position: support

Comment:

No comment text provided.

Chereas Houseman

Lake Andes SD

Position: support

Comment:

I am a member of the Yankton Sioux Tribe and I fully support and encourage the free full access to the Ft. Randall Dam beached & recreational areas for all Yankton Sioux tribal members. I personally grew up in the area and know the joy the river brings to many Native American families. It is very much beloved by the YST people. Our ancestors have utilized the river long before GFP ever became established and think it's a great idea for both the YST and GFP to move in a positive direction of honoring the aboriginal people of the land. I believe it would improve the lively hood and happiness of all tribal members.
-Chereas Houseman

Derrick Marks

Wagner SD

Position: support

Comment:

This is a great step to state tribal relations and acknowledgment of the native people to the region.

Nancy Denney

Lake Andes SD

Position: support

Comment:

What about fishing licenses... due to all the floodings last year..went once. There's about 15 in my family that get one every year.?

Terri Garvey

Lake Andes SD

Position: support

Comment:

This would be a HUGE step forward in mending state/tribal relations. I support passing the motion to allow tribal members access without requiring a payment.

Shawn Perkinas

Wagner SD

Position: support

Comment:

I fully support allowing the Yankton Sioux members free access. (non-enrolled member)

Ramona Drapeau

Lake Andes SD

Position: support

Comment:

My family and I enjoy fishing and some times it's difficult for every family member to purchase a pass so we end up not being able to fish. I vote to allow free passes for tribal members.

Colton Drapeau

Wagner SD

Position: support

Comment:

I would like to see the tribe be allowed free river access.



SOUTH DAKOTA
DIVISION

The Izaak Walton League of America

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

June 18, 2020

South Dakota Game, Fish and Parks Department
523 East Capitol Avenue
Pierre, SD 57501

Re: Annual Pheasant Brood Survey

Secretary Hepler, Commissioners Jensen, Bies, Boyd, Locken, Olson, Sharp, Spring and Whitmyre,

The South Dakota Division of the Izaak Walton League of America (Division) wishes to express our anguish and extreme disappointment in your recent decision to discontinue the annual pheasant brood survey. The League and its members firmly believe in science-based, common sense decisions. We're asking you to reconsider the decision to end this annual scientific survey conducted every year since 1949.

We respectfully request you reinstate the survey and conduct it this summer and every year in the future.

The Game, Fish and Parks Department (GFP) historically has based nearly everything it does on the best available science. It conducts activities that are in the best interest of landowners, hunters and anglers - resident and nonresident - who fund most of the operations of the GFP."

The Division is also very troubled that the decision to stop conducting the survey, which costs about \$90,000 per year, was reached without accepting any public comment. We do not see that as serving the needs of your "customers".

If the decision to eliminate the pheasant brood survey was based on budgetary reasons, we would ask that the nest predator bounty program, which has no scientific support, be cancelled instead. A portion of the \$250,000 earmarked for predator tails could be re-appropriated to conduct the pheasant survey. Years of research show that any program failing to reduce predator levels below their annual mortality rate has no scientific merit. As currently implemented, the nest predator bounty program does not include a youth trapping education component. Without that, we feel it is not a good use of valuable sportsmen's dollars.

Recent results from the summer brood survey have revealed very troubling numbers. While South Dakota can still claim to be "the pheasant capital of the world" and always has the best pheasant hunting opportunities, recent surveys have shown significantly lower populations. We believe the low numbers directly reflect the ongoing loss of critical nesting and wintering habitat across the state.

The Division believes the brood survey is an invaluable tool needed to track population trends as well as changes in the condition of year-round habitats required by pheasants. The survey determines what areas have lower numbers and where quality habitat development, on both public and private land, must occur.

The summer brood survey is also valuable as it provides a real sense for the status of other wildlife species and the condition of crops in the county for the year. The data collected over the long history of this survey is important. The loss of this annual data cannot be recovered once time passes. The GFP would be left just guessing on population numbers without any concrete data. If the brood survey is not conducted it could take years for GFP to get back on track with pheasant population estimates and trends.

The South Dakota Division of the Izaak Walton League of America asks you to reconsider your decision to end the annual summer pheasant brood survey. Please reinstate it as an annual scientific research activity, and don't take the science out of South Dakota pheasant management. The pheasant means too much to this state, the people who hunt it and those who depend on it for their livelihood.

Thank you for your time and consideration. Stay safe and well.

Sincerely,

A handwritten signature in cursive script that reads "Kelly Kistner".

Kelly Kistner

National IWLA President and President of the South Dakota Division of the IWLA

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June 8, 2020

Kelly Hepler, Secretary and Game, Fish & Parks Commission
South Dakota Game, Fish and Parks Department
523 E. Capitol Avenue
Pierre, South Dakota 57501

Secretary Hepler and Commissioners:

Re: *Friends of the Big Sioux River* Comments on the River Otter Management Plan and de-listing the otter from its “threatened” status

Friends of the Big Sioux River is an organization working to improve water quality and clean up the Big Sioux River and other waterways in the Big Sioux watershed. We also work to increase people’s interest in the outdoors. The enhancement of wildlife habitat in the watershed is another objective. Our members and friends have removed barb wire fences, cleaned out trash dumps, planted countless trees, and pulled invasive species from buckthorn to garlic mustard to help improve the flora and fauna of South Dakota’s state parks.

This past weekend we organized a clean-up with the Big Sioux Recreation Area Park Managers, John Dummer and Luke Dreckman, to start the removal of tons of trash from a popular trail system in that recreation area that was damaged by two years of flooding. We are squeezing this clean-up in between the water quality monitoring we are doing in the Split Rock Creek watershed to help identify pollution sources which contaminate the creek as it flows through Palisades State Park. We have been doing water testing for several years at another fifteen sites, including state park access areas such as the Big Sioux Recreation Area and Newton Hills, as well as Lake Alvin and Lake Lakota.

We have tremendous respect for the work done by the South Dakota GF&P. We realize that without the state park system many residents in eastern South Dakota would have few places to enjoy nature. We also know that much of this work is accomplished on thin budgets, and that revenues are shrinking as fewer people are involved in hunting. It is important that GF&P recognizes a shift in people’s uses of the outdoors from harvesting wildlife to simply enjoying the experience of observing wild birds and animals. As our outdoor spaces shrink, and as our human footprint expands, more people are embracing wild animals as creatures that add beauty and fascination to their outdoor experiences and to their lives. We believe that the enjoyment of seeing living creatures is something future generations deserve to enjoy, as well.

There is no greater representation of the fascination and joy in observing wildlife than watching a river otter! The otter is an iconic symbol of river wildlife, and it also represents a species that is playful and communal and fun to watch. Unfortunately, it is difficult to observe them in South Dakota because there are not very many of them here. As you know, hunting, trapping and the degradation of waterways and wetlands obliterated our state’s otter population. By 1977, it

was postulated that this species might be extinct in our state. Through the next several decades things did not improve, as sightings were extremely rare. Fortunately, the Flandreau Santee Sioux tribe introduced 38 otters on the Big Sioux River in Moody County in 1998 and 1999. Scientists have identified the Big Sioux River as possessing the best potential for otter habitat in the entire state.

We now know that from this group of otters introduced on the Big Sioux River have spread out and are now residing on three waterways in eastern South Dakota: The lower James River, the Vermillion River, and the Big Sioux River. By 2004, otter sightings in the entire state of South Dakota climbed to 22. By 2012, sightings rose to 46. This increase can be traced to the re-introduction efforts by the Flandreau Sioux tribe.

We note that a “sighting” might be simply observing scat or tracks or an otter slide in the snow, in addition to an actual animal sighting or finding an incidental catch by a trapper or an animal killed by a vehicle.

Two years ago, verified reports sightings of river otters in our state totaled 38. Last year that total reached 40. These are small numbers, to be sure. Considering how a “sighting” is defined, does this sound like a species that is comfortably rebounding in our state? Is this the level of population resurgence that warrants a de-listing of this species? We suggest that de-listing is not a reasonable step in the recovery of this species currently.

Your agency is making the claim that otters have reached a harvestable point. A spokesperson for your agency stated that improved conditions on waterways and wetlands make de-listing possible. We would strongly argue the opposite. Wetland destruction continues, and water quality issues in waterways such as the Big Sioux River are worrisome. How successful is the state’s riparian buffer program? Habitat remains problematic. Otters continue to face major challenges caused by human beings. This de-listing adds to their challenges.

Your agency explained that for this species to be de-listed there should be confirmed reports of reproduction in three of the five watersheds within the species recovery area. Another factor, according to your agency, is that you need reports indicating satisfactory distribution. We note that over the past five years average sightings are only about 40 per year. We find this inadequate evidence that this species is prospering and no longer deserves to be protected under “threatened” designation.

Your agency’s new recommended management plan calls for an annual harvest of 15 otters per year. Already, 16 incidental otters are trapped each year. There may an increase in otter numbers in our state, but it is happening at a terribly slow pace. Consider the statistics in the following chart.

State	Square Miles	Estimated Otter Population	Annual Harvest	Otters per Square Mile
Minnesota	87,000	12,000	2,000	.14
Iowa	56,000	7,000	692 (5 yr. Avg.)	.125
Nebraska	77,000	5,000	2020 Start	.065
North Dakota	71,000	No actual data is available	20	???
South Dakota	77,000	No actual data is available	15	???

Minnesota, Iowa, and Nebraska have sizeable otter populations and a harvest is allowed, however, Nebraska with an estimated 5,000 otters will just start its harvest this year. Based on the surrounding states' knowledge of their otter populations, South Dakota is hardly ready for a harvest.

The research done by your agency does not support a harvest and this move is premature. The question is why have a harvest season at all? Please consider the facts that:

- Otters do not destroy crops or harm any type of livestock.
- Otters do not create burrows. They mostly use other animal dens or burrows or downed trees for homes.
- They do not cut down and damage trees nor cause any flooding of property.
- Otters do not eat upland game bird eggs, so they do not hurt pheasant populations.
- There is no real economic reason for trapping otters.

Each year our organization teaches classes at water festivals for school kids, and we also teach classes at local schools. We lead off our presentation with a video of a river otter family frolicking as they live their lives. The children are fascinated and curious where they can see an otter. Our answer is: "There may be some around the Flandreau area, but despite all the time our members spend on the Big Sioux River and other rivers and streams in eastern South Dakota we have never seen one." We also tell students that we could have more otters in our state if our state agencies would enforce and prioritize the implementation of clean water practices that would help otters thrive. Clean water is critical for otters, and our state has fallen short until recently in monitoring water quality and enforcing water standards. That unfortunate situation has been well-documented, with admissions by state leaders that funding to pursue clean water projects is scarce.

Friends of the Big Sioux River renamed its printed newsletter *The Otter*. We re-designed our logo to include an image of an otter. We did this because otters represent healthy rivers and waterways. We did it because it is an aspirational goal for our organization – we recognize that healthier waterways mean more otters. But only if otters are given a chance to thrive.

Rather than open otters to harvest and reduce protections for this important animal, we suggest your agency take steps to accomplish this following:

1. Restore clean water to our streams and lakes.
2. Require all landowners to implement riparian buffers on all lakes and streams.
3. Develop an otter monitoring program that accurately determines population thresholds in various watersheds.
4. Set up an otter monitoring team of stakeholders for each of the three main watersheds in eastern South Dakota with verified sightings reported to a GF & P web site with date and location. This can be followed up with verification by a GF & P wildlife specialist.
5. Set a goal of reaching .075 otter per square mile before an eastern watershed is open to a harvest. This is at the low end of otters per square mile compared to other states. Based on the relative size of the watersheds here are our recommendations:

Watershed	Sq. Miles	Goal per Sq. Mile	Needed Otter Population
James	14,700	.075	1,100
Big Sioux	5,400	.075	400
Vermillion	2,700	.075	200
Remaining Area	54,000	.005	270
Total	77,000		2,000

We believe GF&P should recognize the advantage of drawing people to the outdoors by protecting the otter from any harvest. There are far more people and children who admire and appreciate the remarkable otter than there are who want to trap this animal.

We suggest that the public disapproves your agency permitting the trapping of otters and de-listing them considering current numbers. We advise you to work on behalf of all the people in South Dakota who appreciate wildlife. They far outnumber those who wish to trap. We believe it is premature to de-list the otter from its threatened status. Forty sightings through the entire state is hardly a reason to celebrate. It is, however, a reason to focus more attention on doing what it takes to restore otters to our landscape. Doing this sort of work is how an agency earns its keep. It is what you should be doing. We urge you to reverse this decision.

Sincerely,

Travis Entenman
Director
Friends of the Big Sioux River



SOUTH DAKOTA
DIVISION

The Izaak Walton League of America

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

June 18, 2020

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

Dear Commissioners,

The South Dakota Division of the Izaak Walton League of America (Division) appreciates this opportunity to comment on the proposed river otter trapping season. This proposal would establish a state-wide river otter trapping season in November and December or until 15 otters are trapped and reported to the Game, Fish and Parks Department (GFP).

While the Division supports responsible trapping and the sustainable harvest of furbearers, we strongly oppose this proposal. We ask the commission to reject it as we believe this goes too far, too fast for this specie.

The commission took two steps during your May meeting. First, voting to delist the river otter then, approving the development of this proposal. The Division believes this marked the first time in history that a governing game and fish body voted to delist, and then approved development of a harvest season on that specie during the same meeting. Again, we believe, this is going too far, too fast.

The state's river otter management plan is currently undergoing revision. The existing plan states otters are difficult to monitor thus making development of a suitable monitoring program challenging. The Division agrees with the GFP's stance that a healthy, growing population of river otters would be welcomed in watersheds across our state.

South Dakota's current population of river otters emanated from a reintroduction effort. The reintroduction was conducted by the Flandreau Santee Sioux Tribe in Moody County along the Big Sioux River in 1998 and 1999.

Current research and reports show much of the suitable otter habitat and most of the documented sighting are in watersheds in extreme eastern and northeastern South Dakota. We believe this makes opening even a very limited state-wide season extremely premature.

Data shows the population of river otter in the western two thirds of the state is either very low or non-existent. The Division is concerned the current relatively small population of otters could not withstand even a "limited" harvest without suffering a major setback. This at the same time the GFP wants to see this specie expand its range across the state.

The reason given by GFP for the establishing the proposed limited trapping season is the department has been getting about 15 or 16 incidentally taken otters in each of the last five years. These animals were mostly taken in the beaver trapping season.

The Division is very concerned the same level of incidental take that has occurred will continue. That incidental take, coupled with this proposed state-wide trapping season, could possibly double the actual annual harvest of river otters in the state. This added harvest could occur before GFP could get information out to trappers announcing the season is over when the proposed 15 river otters allowed in this proposal are harvested. The potential higher harvest would result in lowering, not expanding, the state's river otter population.

The existing management plan states otters require high water quality and access to year-round open water to survive and successfully reproduce. The Division is concerned that increased surface and tile drainage and grassland conversion is contributing to a decline in water quality in many of the state's watersheds. This, combined with the ongoing riparian habitat loss and the fluctuating water levels due to our highly varied climate, makes accurately predicting long-term otter population growth extremely difficult.

Before a season for river otters is considered in South Dakota the Division asks the GFP to fully address the following:

- Research possible impacts of agricultural run-off on otters
- Develop a peer reviewed otter monitoring program
- Establish peer reviewed otter survey methods to accurately determine population
- Develop peer reviewed otter population goals and objectives and metrics on how they can be achieved
- Methodology to track otter reproduction and population movements
- Coordination of all future otter management with agencies, tribes and other stakeholders
- An outreach plan to inform trappers on ways to avoid incidental otter catches
- A public outreach program to educate the public about river otters

Until these steps are implemented, the South Dakota Division of the Izaak Walton League of America respectfully requests that the South Dakota Game, Fish and Parks Commission reject this and all other otter trapping proposals.

Thank you for your time and consideration and for this opportunity to comment.

Sincerely,



Kelly Kistner

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