

Public Comments

Furbearer/Trapping Seasons

Nancy Hilding

Black Hawk SD

Position: oppose

Comment:

Nancy Hilding
President
Prairie Hills Audubon Society
6300 West Elm
Black Hawk, SD 57718
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Dear GFP Commission

Prairie Hills Audubon Society was opposed to the river otter delisting in May 2020 and we were opposed to the trapping season for Nov 2020.

We oppose redoing the trapping season in 2021 and oppose increasing the harvest limit. We especially oppose doing so without a full public disclosure of all the monitoring required via the 2020 River Otter Management Plan. This data disclosure should happen no later than a month before public comments are due. How can we comment intelligently without new and up-to-date data on population numbers and distribution and incidental take from trapping..

Jon Kotilnek refuses to release population data for various species until such data is disclosed to the Commission. You must hear it before we can get access to it.

Thanks,
Nancy Hilding

Other

Pat Frank

Rapid City SD

Position: oppose

Comment:

No wake at Deerfield Lake should be maintained so that it remains a place for a quite get away from the craziness of overcrowded lakes.

Nancy Hilding
President
Prairie Hills Audubon Society
P.O. Box 788
Black Hawk, SD 57718
May 30th, 2021

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

Dear Game, Fish and Parks Commission,

CONFLICT BEAVER

We don't think SDGFP Commission should approve an increase in beaver season east river under the excuse of conflict beaver management. Conflict beaver management is provided for under SDCL 41-8-23.

SDCL Provides for Conflict Beavers

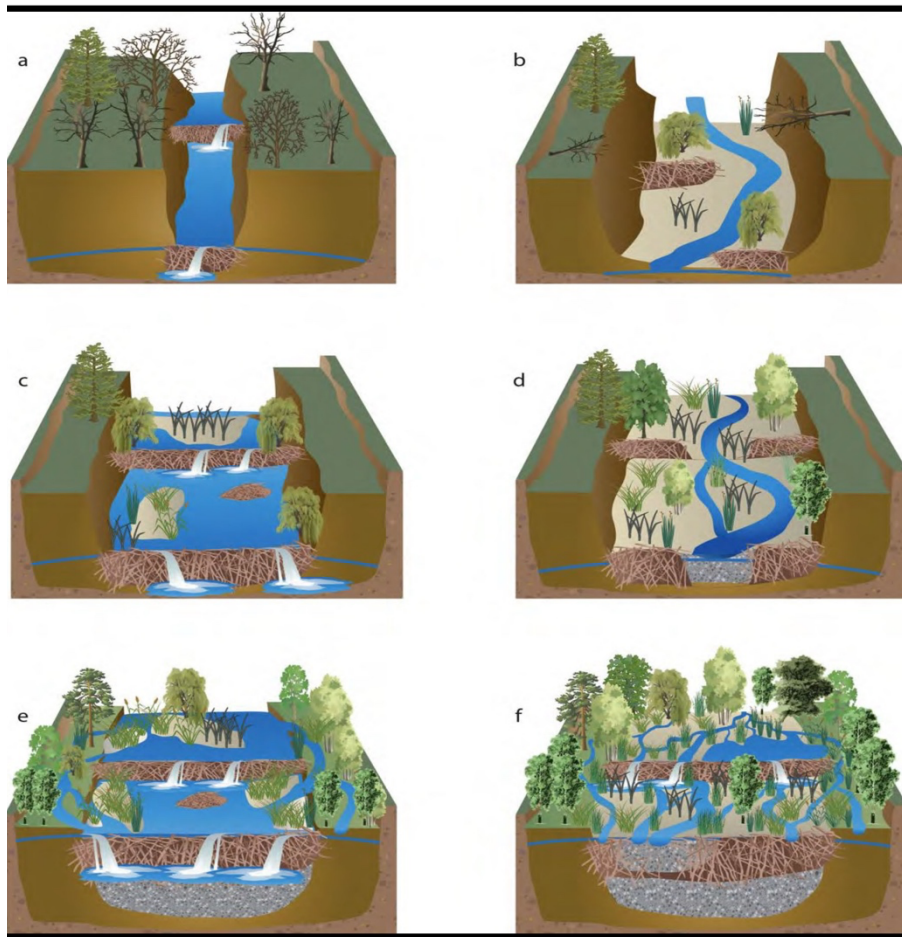
SDCL 41-8-23. Killing of mink, muskrats, and beavers causing damage. Mink may be killed at any time if doing damage around buildings but all such mink killed are the property of the state, if taken during the closed season. If muskrat or beaver are injuring irrigation ditches, dams, embankments, or public highways, or causing any other damage to property, the secretary of game, fish and parks may issue a permit to trap or kill such animals at any time. The Game, Fish and Parks Commission may authorize the killing or trapping of beaver upon public lands and game preserves at any time the commission deems necessary. (Emphasis added)

BEAVER AS A KEYSTONE SPECIES

Beavers help habitat and species

- Beavers are a keystone species
- Beavers create habitats associated with surface water and thus help both aquatic and terrestrial species.
- Beavers may change the landscapes near surface water
- Beaver's dams create settling ponds, which reduce sediment pollution
- Beavers are a Management Indicator Species on the Black Hills National Forest

Here is a diagram showing beaver dams changing the landscape over time from “The Beaver Restoration Guidebook: Working with Beaver to Restore Streams, Wetlands, and Floodplains.” (At page 12)



“Figure 2: Conceptual model illustrating how beaver dams affect the development of incised streams; (a) beaver attempting to build dams within narrow incision trenches where high stream power often results in blowouts or end cuts that help to widen the incision trench, as illustrated in (b), allowing an inset floodplain to form. The widened incision trench results in lower stream power which enables beaver to build wider, more stable dams (c). Because of high sediment loads, the beaver ponds rapidly fill up with sediment and are temporarily abandoned, but the accumulated sediment facilitates the growth of riparian vegetation (d). This process repeats itself until the beaver dams raise the water table sufficient to reconnect the stream to its former floodplain (e). Eventually (f), the stream ecosystem develops a high level of complexity as beaver dams, live vegetation and dead wood slow the flow of water and raise groundwater levels such that multithread channels are formed, often connected to offchannel wetlands such that the entire valley bottom is saturated, as described elsewhere (Sedell and Frogatt 1983, Walter and Merritts 2008). Figure from Pollock et al. 2014.’

STAFF NEEDS TO PROVIDE DATA ON ABUNDANCE AND DISTRIBUTION

We don't think the SDGFP Commission should approve increase in beaver trapping, without a report from staff on population abundance and distribution of active and inactive beaver dams in SD. SD GFP should have some monitoring of beaver populations and dams in place. They are an important keystone species with important impacts to surface water and water quality. They provide many benefits to society besides a hunting resource for hunter/trappers. SDGFP should think of all the other resources beavers provide and other users besides hunters who benefit from them being alive, including wildlife watchers and photographers. You should give special consideration to their purposes on public land.

RIVER OTTER

We don't think SDGFP Commission should approve an increase in beaver season east river as beaver are very important for providing habitat for river otter, which SDGFP has only recently delisted and recently established a hunting/trapping season for. We don't think staff has yet fully reported on otter population monitoring post delisting/post hunting. Why just one year into a river otter delisting, do you want to assault a key part of their habitat and increase risk of incidental take of otter during beaver trapping?

SD 2018 Endangered and Threatened Species Status Review says at page 124
"Of 117 reported river otters killed in South Dakota from 1979 through 2016, 73% were killed incidental to legal trapping activities....
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." (Emphasis added)

From the SD River Otter Management Plan - a chart on incidental take of 216 otters via trapping (page 18)

Table 5. Species targeted when river otter were incidentally captured in South Dakota 2019.

Species	Frequency	%
beaver	116	53.7%
unknown	70	32.4%
raccoon	19	8.8%
fish	5	2.3%
mink	3	1.4%
other	3	1.4%
	216	100%

Melquist in his 2015 report to SDGFP on his 4-year study of SD river otters writes on page 71:

"I do not believe current regulations for harvesting and controlling beaver populations in South Dakota are conducive to the expansion of otters in West River and could hinder the rate of growth in East River. In South Dakota, female otters give birth on approximately 1 April. Any lactating female otter trapped and killed will result in the loss of her offspring. To reduce the possibility of trapping female otters with dependent young, beaver trapping seasons should not extend beyond 31 March. The unrestricted 31 March take of beaver that is currently allowed in West River should be replaced with a harvest season not to extend beyond 31 March if SDGFP plans to try and recover otters in that region of the State. Unregulated shooting of beaver should be discouraged or prohibited to avoid accidentally shooting an otter"

Features looked for in evaluating suitability of different streams for otters (Melquist at page 12)

- *Stream characteristics: Varying water depths and stream velocity, stream meanders, suitable bank cover (trees, shrubs), and presence of bank and instream Structures.*
- *Watershed features: Presence of adjacent wetlands and suitable tributaries, presence of beaver or beaver activity, and the level of human impacts.*
- *Prey availability: A diverse prey base (e.g., multiple fish species, crayfish, and frogs) is always preferable to enhance otter habitat. While I always looked for the*

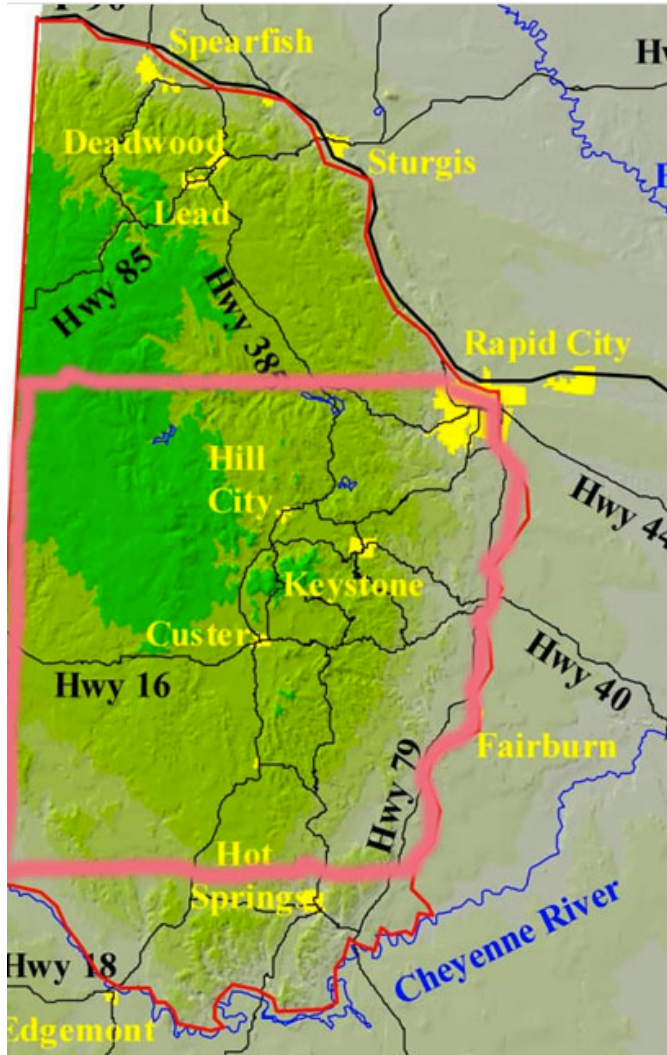
presence of potential prey at each survey site, prey suitability was based on existing data.

- *Other factors: Not a high traffic area and few or no human establishments (Emphasis added)*

BLACK HILLS

The section of SD Administrative Rule on the beaver season, 41:08:01:07, as it describes the season for the Black Hills is not easy to understand. Please view the sections highlighted in yellow and green. We drew a map to show you how they divide the private land in the Black Hills. Why did SDGFP divide the Black Hills private land so the northern Hills has a longer season than much of the central and southern Hills? What is the logic and reason for that? The BHNF, acknowledging their importance, has made them a management indicator species. Why have a 360-day season even appropriate in the Black Hills? We suggest this section be rewritten.

41:08:01:07. *Beaver trapping and hunting season established. The season is open from sunrise on November 1 through sunset on April 30 to catch, trap, or hunt beaver within the Black Hills Fire Protection District south of Interstate 90 and west of State Highway 79, except U. S. Forest Service lands where the beaver season is open from January 1 through March 31. The season is open year-round to catch, trap, or hunt beaver in the remaining portion of the Black Hills Fire Protection District. In all counties east of the Missouri River the season is open from sunrise on November 1 through sunset on April 30. The season is open year-round to catch, trap, or hunt beaver in all counties west of the Missouri River except the portion of the Black Hills Fire Protection District as described in this section.*



An excerpt from the Black Hills National Forest Land and Resource Management Plan
1997 Revision
Phase II Amendment at page II-32:

*The following species should be used as management indicator species (MIS).
The indicators or their habitats will be monitored to indicate overall changes in
the forest ecosystem. MIS will generally be monitored using trends in habitat;
however, when available, population trends may be used as a strong indicator of
management response. Population monitoring will be discretionary as provided

by

36 CFR 219.14.f.(2005).

Black-backed woodpecker (*Picoides arcticus*)

Brown creeper (*Certhia americana*)

Golden-crowned kinglet (*Regulus satrapa*)

Grasshopper sparrow (*Ammodramus savannarum*)

Ruffed grouse (*Bonasa umbellus*)

Song sparrow (*Melospiza melodia*)
Beaver (*Castor canadensis*)
White-tailed deer (*Odocoileus virginianus*)
Mountain sucker (*Castostomus platyrhynchus*)
(Emphasis added)

.....

WE SUGGEST AN ALTERNATIVE RULE CHANGE

As there is a conflict between otters and beaver trapping in April and to clean up the strange Black Hills text of the rule, we suggest that the Beaver trapping rule be amended to read as follows:

*41:08:01:07. **Beaver trapping and hunting season established.** The season is open from sunrise on November 1 through sunset on March 31st to catch, trap or hunt beaver in all of South Dakota, except U. S. Forest Service lands where the beaver season is open from January 1 through March 31.*

Literature Cited

Black Hills National Forest Land and Resource Management Plan 1997 Revision
Phase II Amendment, Department of Agriculture Forest Service Rocky Mountain Region
Black Hills National Forest, Custer, South Dakota, March 2006
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Pollock, M.M., G.M. Lewallen, K. Woodruff, C.E. Jordan and J.M. Castro (Editors) 2017.
The Beaver Restoration Guidebook: Working with Beaver to Restore Streams,
Wetlands, and Floodplains. Version 2.0. United States Fish and Wildlife Service,
Portland, Oregon. 219 pp.:
<https://www.fws.gov/oregonfwo/promo.cfm?id=177175812>

SD Department of Game, Fish and Parks, SOUTH DAKOTA RIVER OTTER
MANAGEMENT PLAN, 2020-2029, Wildlife Division Report, 2020-02, Pierre, South
Dakota, July 2020
https://gfp.sd.gov/UserDocs/docs/otter_plan_2020-08-28.pdf

SD Department of Game, Fish and Parks, STATE T&E SPECIES STATUS REVIEWS,
APPROVED BY SDGFP COMMISSION, 5 APRIL 2018
<https://gfp.sd.gov/UserDocs/nav/status-reviews.pdf>

Wayne E. Melquist, Ph.D., 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, Prepared for: Wildlife Diversity
Program South Dakota Game, Fish and Parks, May 2015
[https://gfp.sd.gov/images/WebMaps/Viewer/WAP/Website/SWGSummaries/FINAL
REPORT](https://gfp.sd.gov/images/WebMaps/Viewer/WAP/Website/SWGSummaries/FINALREPORT)

Melquist River Otters T-55.pdf

Sincerely,

A handwritten signature in black ink, appearing to read "Nancy Hilding". The signature is fluid and cursive, with a large initial "N" and a stylized "H".

Nancy Hilding
President
Prairie Hills Audubon Society