

IUCN/SSC Otter Specialist Group

... leading global otter conservation



Otter Specialist Group

Thomas Serfass, Ph.D. and Nicole Duplaix, Ph.D.
IUCN/SSC Otter Specialist Group

Attn: Board Members
Vermont Fish and Wildlife

30 March 1017

Dear Board Members:

We serve respectively as the North American and International Coordinators of the International Union for the Conservation of Nature's (IUCN) Otter Specialist Group (OSG). The IUCN, founded in 1948, is now the world's largest and most diverse group dealing in environmental issues, including species conservation and biodiversity. The OSG focuses on the conservation of the world's 13 species of otters, including the North American river otter (*Lontra canadensis*).

Recently, we were made aware of a proposal put forth to the Vermont Department of Fish and Wildlife requesting an extension of the state's river otter trapping season. In that regard, we have reviewed various documents pertaining to river otter conservation and management in Vermont, including a letter by Dr. Weldon Bosworth expressing concern about the science and general lack of objective data for justifying an extended trapping season. We concur with Dr. Bosworth's assessment and will not comment further regarding details of limitations for monitoring the impacts of increased harvest on the state's river otter population. Instead, we mention concerns pertaining to the following issues:

1. River otter populations suffered severe declines throughout North America, primarily from trapping. Many populations have partially recovered for various reasons, including reintroduction projects, diminished trapper numbers, and lower fur prices. Nonetheless, population characteristics of river otters contribute to them being particularly vulnerable to overharvest (e.g., relatively low reproductive rates and specific habitat requirements). Given the potential for overkilling, adequate population monitoring is particularly important, which is seldom the case for most state wildlife agencies allowing legal trapping of river otters, including Vermont. In most states, information on the legal killing of river otters is based solely on carcass assessments or trapper reports – neither of these are adequate techniques for reliably assessing population trends given intangible factors influencing trapping pressure, such as the price of river otter pelts, the price of beaver pelts, and annual variation in the amount of open water. We are concerned that further liberalization of river otter trapping seasons fails to recognize the vulnerability of this species to overharvest.
2. The inability of state wildlife agencies to regulate incidental captures of river otters by beaver trappers, and by trappers pursuing other furbearers in aquatic and riparian habitats continues to be a concern for properly regulating river otter killing. Claims of trapping selectivity are often

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overstated, as evidenced by river otters frequently being taken in traps set for beaver. An increase in the intensity of beaver trapping is thus likely to contribute to increased capture of river otters, even if additional harvest of river otters is not warranted. Trigger adjustments on body-gripping traps set for beavers do not reliably prevent river otters from being captured. The inability to control incidental capture of river otters raises concerns about the ability of state wildlife agencies to properly regulate overall river otter harvest, especially during periods of increased trapping intensity induced by higher fur prices and other factors.

3. Wildlife is to be managed as a public trust resource in the United States under the Public Trust Doctrine (PTD). The PTD is based on the concept that certain natural resources, including wildlife, cannot be owned by individuals, but are instead to be conserved by the government in a manner that benefits current and future generations of citizens. An implicit assumption of the PTD is that the values and interests of all citizens be considered in approaches used to conserve and manage PTD-based natural resources. However, the values and interests of those engaged in hunting and trapping have been disproportionately favored in wildlife management decision making at the state-agency level. Extending an already long trapping season (from 4 to 5 months) for river otters would disregard concerns of those that value the species for reasons other than consumptive recreation.

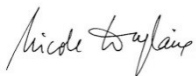
4. River otters give birth in the spring, often in March. Extending the river otter trapping season further into spring raises ethical concerns pertaining to increased potential to kill females rearing young.

For the reasons expressed by Dr. Bosworth, and our examples of additional concerns, we encourage the board to reject the proposal to further extend the river otter trapping seasons in Vermont.

Respectfully,



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