



September 1, 2016

Dear Chris:

I hope that you've enjoyed the summer and that the trapping petition hasn't monopolized a lot of your free time as it has your professional time. My letter today is a follow up to the letter I sent you back on June 3rd, and subsequent email communications concerning Mike Covey's trapping petition.

I want to thank the Department again for making the responsible decision not to lend support to the extended bobcat season. I won't get into all of the reasons why we, and the majority of Vermonters, agree with that decision, but would like to take a moment to express our concern over your decision to allow trappers to keep bobcats trapped incidentally in fisher season. Allowing this undermines the Department's position, creates confusion and may incentivize some trappers to target bobcats out of season. If the only thing the petition seeks to solve is the incidental take of bobcat in fisher season, then perhaps it's time to address whether or not the fisher season needs to continue through the end of December. Making the fisher season concurrent with bobcat season (ending on December 16) again would solve the problem. Also, since fishers perform such an effective job of keeping rodent populations in check, it would seem that shortening their season might help manage small herbivorous mammal populations, especially.

The last time we spoke you informed me that you were still in the process of analyzing the otter data and forming a decision. I look forward to reviewing the data and analysis. Based on the information I've been provided thus far,

Protect Our Wildlife
PO BOX 3024
Stowe, VT 05672
www.ProtectOurWildlifeVT.org

there is not adequate data to support an objective decision regarding extension of the otter trapping season. How can a decision based upon sound science be made when data on trapping effort, including number of licensed trappers, number of traps deployed, and number of days trapped are not available? How do we know which trappers were actually targeting otters? What data do you have that can be used to predict the otter population's response to an extended season? Do we even know whether the otter population is self-sustaining and can tolerate additional trapping mortality? Aren't these the questions that resource managers should be obligated to address in order to ensure continued health of the population?

We know that otter populations are not as resilient as beavers and to expand their season to address their incidental take during beaver season is shortsighted at best. I know you mentioned concern over added nuisance beaver trapping pressure if the season were made concurrent with otter season. I would ask the Department to use this concern as a long-overdue opportunity to promulgate some much-needed changes in place for regulating nuisance trapping. To extend otter season because Vermont does not have a handle on its nuisance trapping is a dangerous precedent and certainly not in the best interest of science, or the otter population.

Why do biologists like Steve Parren go through the admirable work of listing the otter (and bobcat) as species of greatest conservation need only to leave them vulnerable to the whims and wishes of the trapping minority? Trapper convenience should not dictate wildlife policy! The Wildlife Action Plan states that research is needed regarding the "distribution & abundance" of otters. How can the Department reconcile adding a whole additional month of trapping pressure during the female otter's gestation period with the lack of understanding regarding the health and sustainability of the otter population? To manage this species responsibly, one would have to develop a population simulation model using variables that affect the success of the population, e.g., weather, predation, road kill, natural variability in fecundity rates and mortality rates, etc. and then modify those variables to see how the population reacts to added trapping pressure. In the absence of this sound data on the otter population abundance and its response to added trapping pressure, the Department lacks the data necessary to support an objective decision. Exorbitant amounts of Department time, resources and money have

already been spent to respond to an ill-founded petition that satisfies 0.15% of the population who traps.

I know that each petition costs the Department around \$2,500, not counting salaries of multiple employees who must run hearings, develop presentations, gas mileage, and respond to public comment. Is it financially prudent for a Department that is already inundated to spend more time and resources on this petition? This paradigm is tragically flawed in so many ways. There is other critical work that the Department should be performing that would benefit Vermont's wildlife, yet you are saddled with this petition – not based in science, but upon trapper convenience.

The Department needs the financial support of non-hunting and trapping public by way of the non-game fund and other funding options, but unless this majority of the public believes that the Department is acting responsibly (unknown health of otter and bobcat populations), ethically (subjecting birthing otter mothers at risk and bobcats to more leghold pressure), and inclusively (representing our interests), the public will be reticent to support the Department both monetarily and otherwise.

Extending the seasons on these two animals will hurt the Department and the many good things it does. It may well turn the public against the Department and cause them to not support efforts to manage other species.

I look forward to hear back at your convenience.

Respectfully,

A handwritten signature in cursive script, reading "Brenna Galdenzi".

Brenna Galdenzi
President, Protect Our Wildlife

Cc: Louis Porter, Steve Parren, Mark Scott, Catherine Gjessing