



June 3, 2016

Chris Bernier
Vermont Fish & Wildlife Department
1 National Life Drive
Montpelier, VT 05620

Dear Mr. Bernier:

I wanted to take an opportunity to first thank you and Commissioner Porter for your comments at the May 25th Fish & Wildlife Board meeting. It was good to hear that the Department is taking a conservative approach to Mike Covey's petition, and that as you pointed out, it is important to take into consideration the non-trapping public who enjoys passively recreating with wildlife such as otters and bobcats. Vermont's wildlife photographers, trackers, rehabilitators and countless others appreciate you acknowledging their desire to see one of these animals alive in their natural habitat. POW did want to offer some thoughts on the three proposals that were discussed at the meeting.

We are very supportive of the Department's recommendation to not extend the bobcat trapping season. However, we are concerned with the suggestion that trappers be allowed to keep any pelts obtained via an incidental take during the fisher season. This appears like a backdoor method of essentially allowing bobcat take out of season, and even incentivizing that take. We believe that is not a strong enough position for the Department. By allowing trappers to financially benefit from pelts obtained during fisher season, the Department essentially undermines its own position. It also sets a dangerous precedent; if a bobcat is taken in late November in a trap set for another animal, will those trappers be able to keep the pelt as well? We hope the Department can brainstorm ways to make use of incidentally taken animals without financially rewarding trappers who take animals out of season.

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One idea we had was for the Department to donate the fur to wildlife rehabilitators. There are rehabbers across the country that use donated fur for the animals in their care, like orphaned bobcats seen here. There are some challenges to this since the fur would need to be cured. However, we are confident that the public would appreciate this use of incidentally taken animals, and it would remove the incentive—whether real or perceived—that trappers have to trap bobcat out of season.



With regard to the otter proposal to extend the season from four months to five, we encourage the Department to refer to the Wildlife Action Plan and take into consideration the following: Per the **Research & Monitoring Needs**, the following is listed as a high priority under **Threats and Significance**: “*Determine the impact of heavy metals and contaminants on otter populations in each watershed.*” Also, **Distribution and Abundance** is of medium priority with the goal to: “*Monitor distribution and abundance*”.¹ What is the point of having this valuable action plan if the Department does not follow the advice that ongoing research and monitoring is required to address these threats to the future otter population?

Also, in the absence of any biological imperative, why would the Department consider expanding the season into March when that clearly presents a risk to birthing mothers and pups? During the meeting, you stated that while the trapping seasons for beaver and otter populations were previously concurrent, ending in February, the beaver season was changed because the Department believes the beaver population needs to be more heavily controlled than it had been.

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http://www.vtfishandwildlife.com/UserFiles/Servers/Server_73079/File/About%20Us/Budget%20and%20Planning/WAP_2015draft/A5.%20Mammal%20SGCN%20Conservation%20Reports%20%28Draft%209-25-2015%29.pdf

However, if beaver are indeed causing damage and need to be lethally controlled in places, there is always the option to invoke the wildlife causing damage provision and continue trapping any problematic beavers into March (and beyond, as currently allowed). To extend the otter season because otters are getting caught in beaver sets is illogical, and not based in any documented management need for greater trapping of otter.

Lastly, Mike Covey's original petition language included the following: **"Allowing a 72-hour check on underwater colony, cage traps (like killer traps)."** Colony and cage traps are not killer traps, like Conibears that are used under the water. Cage and colony traps when placed underwater drown muskrats, and other animals. Given that muskrats and other semi aquatic mammals can survive without air for 20+ minutes, and possibly longer if the trap isn't set properly, this is a particularly cruel way to trap.

In conversations that POW had with Mark Scott last September concerning advice given by game wardens to people to drown nuisance skunks, he agreed that drowning is an inhumane and unacceptable means of dispatching problem animals. Both the American Veterinary Medical Association and the American Association of Zoo Veterinarians state that drowning is inhumane and not an acceptable method to kill any animal. Therefore, drowning animals in underwater traps must also be considered inhumane, and if anything, instead of extending trap times, the Department should be considering allowing only Conibear-type underwater sets that kill quickly, not over minutes or longer.

Also, as you know, colony and cage traps are not always set under water. They may be set in shallow water and on dry land. To extend the trap check time to 72 hours is not advancing best management practices, it is contrary to accepted professional protocols for humane treatment of animals, and it runs counter to the Department's own understanding of humane, responsible, and professional treatment of wildlife.

I look forward to hearing your thoughts and would still like the opportunity to meet with you in the near future.

Sincerely,

A handwritten signature in black ink, reading "Brenna Galdenzi". The signature is fluid and cursive, with the first name "Brenna" being more prominent than the last name "Galdenzi".

Brenna Galdenzi, President

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

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