



May 18, 2016

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

Dear Mr. Bernier:

I am writing in response to your email dated Friday May 13th informing me that your schedule doesn't allow for a brief meeting. The purpose of my meeting was twofold: for me to introduce myself and discuss some possible shared areas of interest and secondly, to briefly address Mike Covey's petition to extend trapping opportunities.

Since Mike Covey's petition was submitted to the Department in October of last year, my organization has been in contact with Catherine Gjessing in an effort to track the Department's progress in reviewing the petition. We just learned that after Department discussions with Mr. Covey, the petition was recently revised. We are disappointed that discussions, that involved Department personnel and were integral to the development of the revised petition, have not been shared with us despite repeated requests. This lack of transparency raises concerns over how much the public is allowed to understand the development of wildlife policies that impact all of Vermont's residents. We have not yet shared the petition with the public, including over 3,000 POW members and supporters, as we were waiting to obtain information from the Department as to your position. POW continues to have strong objections to these controversial changes and hopes that the Department will not lend its support to these unnecessary proposals.

This petition is consuming agency resources and thus taxpayer dollars to address frivolous extensions to trapping seasons and trap check times. The resources in the form of time and money that the Department routinely expends to placate trappers, who are a

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minority in our state representing .1% of the population, is fiscally irresponsible. Trappers in Vermont have ample trapping opportunities including: trapping on public land, no required set backs off of trails, the use of Conibears on the ground, trapping on National Wildlife Refuges inhabited by lynx and state endangered species, trapping out of season for the purpose of “nuisance” wildlife control, among others. Trappers are also not required to report the number of animals trapped each season rather it’s done on a voluntary basis. As a result, the Department lacks complete data on the number of animals trapped each year, and it would be imprudent to expand trapping opportunities without securing and analyzing this missing data. The trapping “harvest” numbers that have been shared with the public are misleading, especially when these numbers are not prefaced with the caveat that they are only based on a fraction of trappers who return surveys.

The six trapping proposals put forth in the petition are unwarranted and have regrettably consumed time that could have been better spent on the important work that you perform as a biologist to promote projects that are based on principles of conservation, rather than the whims of a small special interest group. Nonlethal methods of studying furbearer species, including otters and other animals used for their fur, include analysis of deposit scat and mucosal secretions from latrine sites and fur from living specimens as well as telemetry technology. These methods would be something that the majority of Vermonters would embrace, and I would suspect even help fund.

To address the remaining 3 trapping proposals:

1.) **Extension of bobcat season to coincide with fisher season**

This one is perhaps the most egregious, given the current national climate on bobcat hunting, as recently witnessed in our neighboring state of New Hampshire. Bobcats are listed as a species of “medium priority” in Vermont’s Wildlife Action Plan and for good reason. Bobcats face various threats including loss of habitat, and “ *the impacts of climate change, particularly with respect to changes in prey and sympatric carnivore distribution and abundance, may present significant challenges to bobcats through the future.*”¹

We question the legitimacy of any bobcat trapping season at all, never mind doubling the length of the season. What data does the Department have that shows the bobcat population can sustain current trapping levels, much less an extended season? A long-term trend in the population needs to be established before any change can be considered.

¹http://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

Vermont may very well end up like New Hampshire where bobcat numbers were allowed to get unsustainably low and trapping (and hunting) had to be stopped altogether. We've had conversations with Vermonters across the state, some of whom have lived here for decades and they have never seen a bobcat and hope to some day. How does bobcat trapping benefit Vermonters or the ecosystem as a whole?

There is also the issue of incidental takes of Canada Lynx that the Department should consider. We have been contacted by groups, such as the Animal Welfare Institute (AWI) who share in our concern over the takes of these animals. AWI and other allies have been at the forefront of preventing the unnecessary takes of endangered species, and we should all be glad that their focus is turning to Vermont. Based on our close working relationships with wildlife advocates in Vermont, Maine, and New Hampshire, it's glaringly clear that the majority of people place more value on a living bobcat than a dead one, and would also like to see Vermont do all that it can to encourage the re-establishment of an sustainable lynx population.

If the impetus of this proposal is to mitigate the non-target catch of bobcat, then wouldn't the prudent solution be to reduce the fisher season by two weeks? Rule changes that would gravely impact our wildlife just to make trapping more convenient for a few cannot be supported. We are confident that the Department will make the biologically sound decision and deny this proposal, for the sake of conserving this species, and honoring the wishes of the majority who value these animals.

2.) **The one month extension of otter season to coincide with beaver season**

Again, this proposal seems to address the matter of trapper convenience, not what's in the best interest of the species. The current trapping season on beaver is five months, not including the amount of unreported trapping that occurs all year long under the unregulated "nuisance" wildlife provision. If there is a concern over takes of otter during beaver season, then shorten the beaver season.

Otters are listed as a medium priority species in Vermont's Wildlife Action Plan. Otters face the threats of habitat degradation and pollution; presenting them with another threat by extending the season by one month is irresponsible and shortsighted. I haven't focused on the topic of cruelty in this letter as we understand that the implementation of less inhumane practices is not the priority for everyone, but it is important to recognize that otter pups will be orphaned if trapping is extended into March since pups are born between the end of March and May. Otters

are a favorite species among wildlife watchers and we can assure you that the public will be disturbed by the inevitable consequences of such an ill-conceived proposal.

Given that it's accepted knowledge that beavers are a species we should all be embracing as we face the real threats of climate change, shorten the beaver season to the end of February and solve the issue of incidental takes of otter.

3) Extending the check on muskrat colony traps to three days

The petition refers to this proposal as a matter of "housekeeping," but housekeeping, i.e. convenience, does not warrant changes to trapping rules, especially when such changes have significant animal welfare implications. These extended trap check time would potentially render the pelts compromised or unusable. A better option would be to require 24-hour trap check times for all underwater traps.

Across the country people are moving toward a new concept of interacting with the natural world and the values that we use to determine wildlife management policies. According to the Department's own research, we are seeing huge shifts in how Vermonters recreate with wildlife, with 80% participating in wildlife viewing.² If these frivolous trapping proposals are implemented, it will satisfy a few who trap, but surely will disappoint the majority of us who hope that one day we can catch a glimpse of an otter, muskrat, or bobcat, even for a fleeting moment. Our members and supporters are constituents and stakeholders in these decisions and stand ready to oppose these new trapping opportunities that benefit the 800 people who trap in Vermont.

Sincerely,



Brenna Galdenzi
President

Cc: Catherine Gjessing, Louis Porter, Scott Darling, Steve Parren, Jon Kart, Kate Webb

² Responsive Management. 2015. Opinions on Fish, Wildlife, and Land Use Among Vermont Residents, Hunters, and Anglers. 130 pp.