

Montana Trapping Advisory Committee Public Comments for Fifth Meeting
Comments received by email after April 2
and DURING the meeting April 2-3, 2019, Helena
24 Comments

Greetings John!

Please share my thoughts on trapping guidelines with the TAC.

Thanks!

Jane Madison Kesel

Helena, MT

In November of last year, my dog Maria was caught in a leg hold trap in the Scratch Gravel Hills near a very popular trailhead. The trap was located less than a mile from the trailhead. FWP determined that the trap was illegally set in the trail and did not have the appropriate ID attached to it. In addition, there was a snare trap located nearby. FWP pulled both traps.

Trappers I know have said the trap that caught my dog was probably set by kids who didn't know the regulations. This points to the need for mandatory education for all trappers. If people are ignorant of the regulations, they shouldn't be trapping. Licensing would insure that trappers have undergone the appropriate education and are familiar with the regulations. Trappers not obeying the regulations should be fined and their license revoked.

Trappers harvest wild animals that belong to all Montanans for minimal, if any, licensing cost. This is not true of hunters and anglers who must purchase a license. These fees go towards managing the resources harvested by hunters and anglers. It is only reasonable that trappers, just like other groups who consume Montana's valuable wildlife resources, pay their fair share.

Every urban area in Montana should have at least one trap free location where adults, children and pets can recreate without the fear of traps. In addition, trapping should not be allowed within 2 miles of popular trailheads. A notice that trapping is occurring in popular recreational areas should be required. Had I known that trapping was occurring so close to the trailhead in a heavily used recreational area, I never would have ventured there with my dog. FWP could determine the areas in which these notices are required. People who recreate in these areas would thus be warned to exercise caution when straying off of the trail.

Trapping is indiscriminate and violates the ethics of fair chase. Not only is the targeted species trapped, but non-targeted species (including endangered species)

are also caught, often leading to life-threatening injuries. All trapped animals should trigger mandatory reporting so that FWP can accurately determine the effect of trapping on all of Montana's wildlife, thus allowing them to better manage this valuable resource.

Trappers, by necessity, conceal their traps, making it hard for non-trappers to spot them. This increases the vulnerability of non-trappers to traps. Trappers essentially hold public lands hostage with their ubiquitous, hidden activities. It's time for trappers to share Montana's vast public lands. FWP policies limiting trapping in heavily used recreational areas would achieve this end. Only an extremely small fraction of Montana's public lands would be off-limits to trapping and a substantial number of Montanans would be able to enjoy at least a small portion of Montana's public lands without the fear of traps.

Mr. Vore,

I am not able to attend the TAC5 meeting this week and wished to share my personal opinion, as a Montana resident, regarding why a mandatory 48 hour trap check should NOT be instituted:

* Firstly, a mandatory 48 hour trap check would unnecessarily criminalize someone for being even one minute late beyond that timeframe. What I mean by this is that a mandatory 48 hour trap check would actually necessitate trappers to check traps at least every 46-47 hours, and therefore earlier and earlier every other morning (if on a 2 day trap check). Over a short amount of time, to meet each subsequent 46-47 hour timeframe, trappers would be forced to check traps earlier and earlier, into nighttime hours even, just to maintain compliance with the law. The presently recommended 48 hour timeframe allows 2 day trap checks without criminalizing someone for being a minute late.

* Secondly, a mandatory 48 hour trap check does not consider unusual circumstances that might quickly prevent someone from meeting that timeframe, despite their best efforts to do so, such as due to a sudden illness, bad weather, or a vehicle breaking down. For example, as you and I both know, winter storms can change road conditions so much so that law enforcement closes various major roads each winter, despite the preparedness of the individual to drive in changing road conditions.

* Thirdly, a mandatory trap check is excessive in that it would not distinguish between lethal and non-lethal trap sets. For example, under ice trap sets for beaver have no possibility of catching dogs and yet would be held to the same mandatory trap check standards as non-lethal sets.

* Fourthly, a mandatory 48 hour trap check produces a slippery slope that animal rights groups are seeking to exploit. Specifically, as has been done in other states, such groups will claim that there is insufficient FWP law enforcement personnel to guarantee compliance with trap check requirements and will seek to argue this as justification in their efforts to further restrict or ban trapping.

* Fifthly, a mandatory 48 trap check will unintentionally increase conflicts between the trapping and non-trapping public, in that it will essentially encourage trappers to trap closer to their residences out of

concern for maintaining compliance with a mandatory trap check time. Fewer trappers will trap the more remote areas, where there is less conflict with other recreational users.

Under the current 48 hour recommendations, lawful trappers already seek to minimize the amount of time an animal is restrained while balancing animal welfare considerations through the use of best management practices (BMPs) and maximizing the responsible use of lawfully harvested animals (e.g., fur, meat for human consumption, other useable parts).

Although a mandatory 48 hour trap check may seem well-intentioned, based on the concerns respectfully listed above, I sincerely encourage you to vote AGAINST a mandatory 48 hour trap check.

Respectfully and sincerely,

D. Steintl,
Missoula, MT

From: CenturyLink Customer MICHAEL G FREEMAN
Sent: Monday, April 1, 2019 8:25 PM
To: FWP General <fwpgen@mt.gov>
Subject: mandatory trap checks

Dear Mr. Vore-

I am writing in regards to the mandatory trap check. I feel you should leave it the way it has been with a 48 hour recommendation. A mandatory trap check leaves no room for emergency situations, such as medical conditions, weather, road closures, etc. A 48 hour trap check does not differentiate between types of sets- for instance, conibear and drowning sets where the animal is frozen.

If you don't realize the problem of predators and the effect of less trapping due to a mandatory check, you need to rethink the detrimental effects this will have on all wildlife, unless your ultimate goal is to shut down trapping and ruin big game hunting as we know it, which has already changed drastically in my lifetime because of predator numbers soaring.

Montana FWP is established to manage wildlife, not cater to people's feelings and pocketbooks.

Please do what is right and manage wildlife and follow what the majority has already spoken at the House Bill hearings and leave it the way it is with a 48 hour recommendation.

Also, feel free to call me if you have any questions @ 406-261-3625

Thank you-

Mike Freeman

Montana Registered Voter

Flathead County

Mr. Vore:

I heard there was going to be some panel meeting on trapping in Montana in April. I wanted to write since I learned how people are still trapping animals. For some reason I thought people used live traps like I do when I am trapping a stray cat.

Firstly, I am sure most understand how cruel it is to inflict pain on an animal, leave it in a trap or trap it underwater. This is not momentary mental anguish and physical pain. Animals are left to suffer. Human executions don't proceed like this. Indeed, we have laws that protect our pets and domestic animals from abuse from humans. What is the difference with wild things. Animals are biologically complex organisms. Their DNA is not that different from that of humans. We should have more respect for them on this basis, at least.

Traditions are not sacrosanct. We should not blindly pursue customs that we have come to realize are purposeless or wrong. Trapping does not put food on the table, is not sporting but malicious and does not preserve the wild things we should be trying to protect . The deck is already stacked against them.

Earth and its wild things, I am sure, were not placed here for human recreation. By now we should know this is not just "our" playground. Homo sapiens is the only species that pursues activities that hasten its own demise. (It seems like it has to bring down everything else with it). At least we can mitigate this with a legacy of attempting to protect our vulnerable creatures like these animals, children and the elderly.

I hope your panel achieves something worthwhile.

Sincerely,

Eugenie Haight

Mr. John Vore,

A mandatory trap check time in Montana is unworkable for many of our furbearers and conditions. It is not a matter of laziness or disregard for animals it is a fact of life!

Please let me explain: I have trapped in 11 states and was a professional full-time trapper for 18 years. I have trapped as far east as Ney York, West Virginia, Pennsylvania , Ohio and Indian and I have trapped Texas, Colorado, Wyoming and Montana and others. Trapping conditions and situations differ across those areas.

In the densely populated, by both humans and animals, areas of the east a 24-hour check law makes sense. I followed it and it worked and I was always in favor of it. Animal ranges are greatly reduced because of the quality of the habitat. Food supplies are as much as 10 times as dense in the eastern states as they are in the western states.

Animals such as coyotes and bobcats, two very popular western species are new or still very limited in the Eastern States but never the less have much smaller travel ranges in the eastern states than they do in the western states. Human traffic is much, much greater in the east and does not scare off these apex predators as much as it does in the west where humans travel in the habitat these species occupy.

The purpose of trapping in wildlife management is to control the population of species that will cause damage or depredation. Its purpose is not to eliminate it but to manage it at viable levels where the best balance is achieved. When a trapper must check his coyote or bobcat traps every day, he disturbs the area needlessly and keeps a strong human scent in the area warning those animals to move on. The exception is the younger animals. So, what happens is the younger animals are caught while the older animals are not. The older animals are the ones creating the most problems and often when they are removed the problem will stop at least for a period of time.

If we continually remove the young from the echo system what happens when the old ones die?

The same is true of beaver. Beaver live in family units. Usually consisting of adults, two-year old's and young of that year. Much of our beaver trapping occurs under ice. When a trapper cuts holes in the ice to set beaver traps, it disturbs the beaver. They do not travel very far from their lodge. The one exception is they do travel to their food cache which is very near the house. This is their only food supply when the pond is ice covered and they must go to it and cut off a branch and return to the lodge to eat the bark.

A disturbed beaver typically stays disturbed for 3 days, meaning lodge bound. The larger the beaver the further they travel from the house so a smart trapper wanting to manage not wipe out the beaver will set his or her traps at the extreme range from the lodge the beaver are traveling to catch the adult beaver.

The problem with a mandatory check is that the trapper is then forced to set the traps between the lodge and the feed bed. This is a very effective spot to catch a beaver. The problem is chances are great that the smallest beaver will be the ones to get caught. The smaller beaver are more active. Going to and from the feed bed multiple times per day. They do not go far but they do go often. So, under this scenario the smallest beaver are the ones being caught and the larger ones causing the real damage are left to continue creating problems.

In open water I check beaver traps every day. It makes sense to do so but I must have the flexibility to make the trap check time decision.

Its not good wildlife management to remove the young of a species. We do not do that unless we want to drastically reduce the population of that species. You can now see what a mandatory check law goes against all trapping principles.

But let us be fair. Let us look at how a mandatory check law will stop what the anti-trapping groups claim that traps do.

Will it stop the catching of unwanted species? No!

Will it Stop the waste of furbearers by trappers? No and there is no evidence to show trappers waste furbearers nor would common sense tell us that after all the hard work done by a trapper that they would waste an animal.

Will it stop the suffering they say animals go through? No. First because modern traps come in two types. Killers and foot holds. Killer traps kill on contact, the animal is dead it cannot suffer. All the water animals, many coons, most martin all die almost instantly. The ones that are caught in foot holds for the very most part are not harmed. An animal just caught does show distress because they are scared. Something jumped up and grabbed them surprising them and they react by trying to get away. That is going to happen to every animal caught but they soon settle down and often go to sleep or finish eating the bait and then go to sleep.

I transplanted foot hold caught animals for many years as a professional trapper. Caught many more for study. There could be no damage and there was no damage. The wolves that were caught up north and moved to be released in Montana were all caught in foot holds! So, trappers using proper equipment do not cause animals to go through prolonged suffering.

I am an animal lover. I have worked endlessly in education and assistance with Fish and Game departments, universities, land owners, and municipalities to making trapping as humane and as responsible as possible. Do bad things happen? Yes. Animals get hit by cars, they get stuck in fences, they fall into wells they are attacked and eaten by other animals. No one wants that but no law can prevent every instance of it from happening.

I have caught people's pets in my trapping career and never once did that animal go home with a missing foot or need to be put down like the antis claim. They make claims they were walking their dogs and suddenly they were gone, and they could not find them for days. Those are lies. A pet dog caught in a trap sets up to barking immediately! He wants his owner to find and help him. But more importantly most of those dogs' owners were already in violation of the law not having their dogs under control. Allowing their dogs to go out and destroy wildlife nests and young indiscriminately.

I would be happy to discuss this with you in greater detail if you wish. Cell - 406.403.3345

Please do not allow the mandatory check law to pass. Its bad for trapping, its bad for Montana but most importantly it is bad for wildlife!

Sincerely,

Jim Helfrich - Professional Trapper

Name: Harold Johnson

I am really disappointed that the Montana Fish and Game is dragging this Trappers Advisory Committee out to 5 meetings. It was scheduled for 3. Your organization is wasting our fish and game dollars over a 24 hour trap check. We as Montana citizens will fight this to the end. If NRDC is going to sue over it, then let them sue. You WILL NOT put forth unnecessary regulations of the people of Montana to avoid lawsuits from out of state interests.

From: Royce Dake

Sent: Tuesday, April 2, 2019 1:15 PM

To: FWP General <fwpgen@mt.gov>

Subject: Attn: John Vore Mandatory Trap Check

I oppose a mandatory daily trap check. It is not necessary, or doable. A mandatory trap check doesn't take into consideration the weather extremes that we can have. If the weather causes road closures what is a person to do? The recommended 48 Hour trap check that we now have is very reasonable and doable. I am sure that you are getting a lot of comments from the anti-trapping animal rights communities because they solicit comments from their members from all over the country but they have no concept of how the real world actually is. Their ultimate goal is to eliminate all trapping one little piece at a time by making it more difficult for the trappers to comply with their mandates. I strongly urge you to oppose a "Mandatory Trap Check"

Thank you. Royce Dake.
Ulm, MT

I fully support the continuation of trapping in Montana. Ethical trapping is no threat to people and pets that are appropriately trained and controlled.

Please include these comments in the official record as testimony in favor of trapping status quo in Montana.

Sincerely,
Miriam Perry Lyngholm
Missoula, MT

Why Should We Have 24 hr/Daily Trap Checks?

Why is Trapping Reform Necessary?

Trapped animals are exposed to the elements, the bitter cold, risk frostbite, dehydration, unable to escape from potential predation, ie. other animals attacking and feeding on them. Trapped animals commonly suffer from mouth injuries and for some, tooth loss, as was the December 2018 case of the little lost dog trapped overnight in Helena. Animals bite at the trap to try to escape. Some eventually bite off or twist off their trapped paw. Trappers call it wring off.

A wolf trapping study was conducted in Minnesota between April and October, with almost all captures occurring when temperatures were above freezing. The trap tested was a leghold trap Livestock Protection Company #4 with smooth offset jaws. 18% of the captured wolves had dental injuries rated as "moderate" to "severe" and the rest were described as uninjured to having "mild" injuries. **"Serious leg injuries were relatively common; however, compared with different trap types tested in other studies, 63% were scored as having moderate to severe damage including major cutaneous lacerations, tendon damage, and fractures including some to the radius or ulna."**

Sahr, D.P., and Knowlton, F.F., 2000, Evaluation of tranquilizer trap devices (TTDs) for foothold traps used to capture gray wolves: Wildlife Society Bulletin, v. 28, p. 597-605.

The Association of Fish & Wildlife Agencies (AFWA) represents North America's fish and wildlife agencies to advance sound, science-based management and conservation of fish and wildlife and their habitats in the public interest." "The purpose of Association of Fish & Wildlife Agencies (AFWA) Furbearer Management and Best Management Practices for Trapping Program (BMPs) is to improve regulated trapping by evaluating trapping devices and techniques used for the capture of furbearers and educating those who use traps about the most humane, safe, selective, efficient and practical devices. "

Association of Fish and Wildlife Agencies states, "Make a commitment to check your traps at least once every day. When you set out a trapline, you assume responsibilities. Animal welfare is a top priority. Most furbearers are nocturnal so it is best to check your live-restraining traps at first light each morning. If you cannot check them at daylight, check them as early in the day as possible. One important difference between trapping and hunting is your commitment to work your trapline every day until you remove your traps. Hunters can choose the days they want to hunt, but trappers must check their sets every day. Bad weather or other problems should not change your plans. If you cannot personally fulfill your responsibility to wildlife and fellow trappers because of illness have another licensed trapper check your line. "

36 states have 24hr/daily trap checks within their trapping regulations. These include Washington, Colorado, New York, Arizona, Vermont, New Mexico, Minnesota.

The longer an animal is in a trap the greater the damage whether that be to a coyote, a wolf, a mountain lion, a wolverine, an eagle, a lost pet or a working dog.

When the environmental temperature drops below 32° F (0 celsius) blood vessels close to the skin start to narrow and constrict. Frostbite strikes the areas of the body that have the slowest circulation. The death of tissue due to frostbite is actually caused by a lack of blood flow. This is what occurs as an animal lingers in the trap during temperatures below freezing. As frostbitten tissues thaw. they may become red and very painful due to inflammation. The clinical signs of frostbite may take several days to appear. Severely frostbitten areas will become necrotic or die. Animals such as mountain lions highly dependent on those paws have little chance of survival and are believed to eventually succumb to the effects of frostbite after they are released from a trap.

48 mountain lions were reported "accidentally" trapped in a two year time frame 2013-2015 in Montana according to FWP reports. 16 of those were caught in traps set for wolves. 1/3 of those mountain lions in "wolf trap sets" were dead. Recall wolf trap sets require 48 hr check times! 32 mountain lions were caught in traps not set for wolves, ie smaller leghold traps, snares, conibears. 66% were dead! 84% of the reported mountain lions were DEAD OR INJURED! and these are just the ones we know about. 96% were deemed legal trap sets. Over 75% were on public land.

According to the American Medical Veterinary Association, "Limb restraint is likely to cause fear and intermittent collection of animals caught in leg-hold traps means that fear may sometimes be extended as long as 24-hours (with 9 states allowing longer periods). Leghold traps cause injury that sometimes exceeds ISO welfare standards."

Per the FWP "Non-Target Wildlife Captured in Traps (non-wolf traps)" reports in just 15 months from 10/26/13-1/24/15. Montana trappers reported 63 non-targets, i.e. animals they did not mean to trap. These were not traps set for wolves, either. Among the captures were mountain lions, wolverine, grizzly, great horned owl, deer, black bear, goose, eagle and other raptors. 30% were on private property. Only 1 trap was deemed ILLEGAL. 71% of these 63 non-targeted trapped and reported animals were found DEAD. Trappers DO NOT have to report the non-targets, the accidental captures, if they think the animal is unharmed unless they are in wolf traps.

A condition known as capture myopathy occurs when animals overexert themselves (struggling in a trap for example) so much that physiological imbalances develop and result in severe muscle damage. Capture myopathy may result in sudden death, or clinical signs may develop hours, days, or up to two months following capture in which the animal eventually dies from heart failure. Those that work in wildlife rehabilitation can attest to this.

An average of 55,000 animals are trapped and killed annually in Montana according to FWP. Most of these numbers come from trappers completing a voluntary survey. Less than 1/2 of the trappers complete the survey. Non-targets, accidental trappings, are not included in the harvest reports. The collateral damage from those animals that eventually escape with the trap still attached, the trap released that still perish, the orphaned young are also unaccounted for.

104 dogs were reported TRAPPED in Montana in less than 30 months, 9/2012 - 2/2015 according to FWP reports. Over half were with their owners. Some pets get killed. Some never get reported. No records are kept of trapped cats. Some pets are lost and found or freed from traps multiple days later. Most incur vet bills that the owners pay. Some trapped pets never make it home.

Scientists and researchers that want the animal alive and uninjured conduct 24 hour trap checks, at minimum. For most, it is every 12 hours including what is practiced by Montana FWP biologists. Many do not trap in the winter in order to avoid frozen paws. Some scientists also put sensors on traps to signal when an animal has been caught, allowing them to respond quickly.

"The longer that animal is in a trap, the more likely you have foot injury, shoulder sprains, vascular damage, neural damage," said Carter Niemeyer, a retired wildlife biologist who believes traps should be checked daily.

Guidelines from the American Society of Mammalogists state, "Snares or spring foot-hold traps must be checked at suitable frequencies. These observations should be a least daily, but more frequent depending upon target species, the potential for capture of nontarget species, and environmental conditions."

According to the Guidelines from the American Society of Mammalogists, "The number of traps set at a particular time and location should not exceed the ability of the investigator(s) to monitor them at reasonable intervals. Because frequent checking of traps is the most effective means of minimizing mortality or injury to animals in live traps."

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Trap Free Montana Public Lands (TFMPL)
Hamilton, Montana

Betsy Brandborg
Helena

Has had dog trapped several times
Hikes Vigilante, Hellgate & Avalanche
Trappers are not checking their traps there
Wants signage
500" setbacks
All trappers should be licensed and go through trapper ed
Report all animals trapped

Art Compton
MT Chapt Sierra Club

Hunters seen by most Montanans as ethical, trappers are not
Public perception is tht trappers oppose any reasonable regulation
Education program – MTA good start
WAFWA also has ed program
FWP commissioners state they are open to change

Public Comment for Trapping Advisory Committee 4/2/19 Helena

One thing trappers and non-trappers agreed upon was trapper education.

In Miles City, I was asked if Trap Free would support such a bill.

In good faith, we asked Representative Bridget Smith if she would do a trapper education bill.

The same provisions the department and trappers brought forth to the Commissioners in 2017 were included in the bill language. Rep. Smith grabbed the place holder early on. The TAC was notified and provided the rough draft of the bill. Early January, we met with Hank Worsch, FWP legislative liaison. Each member of the TAC in Great Falls was made available a copy of the bill draft language.

We asked Representative Smith to hold off on finalizing the bill language in order to get the TAC's input. When that didn't happen, the language had to go ahead and be finalized and included some of what the TAC had recommended in their discussions, i.e. minimum fee for the class, dispatch methods, how to avoid non-targets, safest trap release and items such as instructor qualifications like in the 2017 proposal.

The main complaint during the hearing testimony was the advisory council was inclusive of other stewards; for example, a veterinarian, a rehabber, a rancher, a hunting dog trainer. The Montana Trappers Association emailed legislators stating it's a bad bill that would allow anti-trapping, anti-conservation groups the potential to determine the curriculum and direction of a Montana trapper education program. I was told directly from a TAC member they wouldn't support the bill because we were involved. To object to the inclusion of non-trappers is an insult to this TAC, their hard work, the department's ability to vet and select council members and a violation of the public trust.

Rep. Smith tried to work with Rep. Doane. His language draft was never seen or apparently even drafted. At the hearing, in order to try to get the bill passed, amendments done by the department were given to the legislative committee to consider instead of the original language. After the hearing, TFMP asked the legislative committee to further amend the bill to 3 sentences, given all the complaints. We asked that it simply permit FWP to again design trapper education with Commissioners oversight and for there to be an advisory council as per statute operating as advisory only. The amendment didn't happen.

Thank you,
KC York
President/Founder
Trap Free Montana Public Lands (TFMPL)



PO Box 1347
Hamilton, MT 59840

Michael McKendrick

1st and 2nd meeting: Ms. Tribe had shut down Mr. Strong on trap check times, so why are we discussing trap check times again? Discussion trap check times is giving someone something they want, which Mx. Tribe said we wouldn't do on this committee.

Trapper Edu. Rep. Smith's bill needed to be killed. Reasons?

1. Backed by Trap Free MT and Wolves of the Rockies. Both Anti-trapping groups.
2. The way it was written and the way it was amended still made it a bad bill.
3. It allows Anti-trapping groups tell Trappers What to do.

What most on this committee don't realize is that we already have a Trapper Ed. Course The MTA

Tim McKendrick

With MTA
FWP should mark "What's New" in the regulations
Snow can make trap height regulations hard to follow
1000' setbacks – "dwellings" is ambiguous

Claire Bioman
Missoula
With Trap Free Montana Public Lands

Make regulations clear and consistent
Some trappers misunderstand/misinterpret regulations
R2 HQ – Trap-free zones
Licensing & Education

Jeff Rader
Livingston

Mandatory trap check not needed
HB 279(?) re: trap checks was tabled
Any mandatory check won't work
Recommended 48-hour works fine

Colleen Crill
American Prairie Reserve biologist

Thank FWP for committee
Thank committee

Michael McKendrick

There should be no trap check whatsoever. If there was 24-hour or daily, check your mouse traps every 24 hrs. or day. You can't do it. I can't do it. Up at the capitol on the hearing of the bill of 24 hr. trap check, Mr. Kujala had answered a question from the committee. Does FWP have enough staff to enforce 24hr. trap check? Mr. Kujala's answer was no. You are hearing it from Game Warden's here. There are only 72 wardens in the State of Montana. FWP does not have enough people in the field to this. So why are we still taling about trap check. That should be off the table.

Bill Roland
Ovando

No trap checks
Many people talk about animal suffering, but trapped animals don't suffer
Causes of natural deaths of wolves: other wolves, injuries, disease
A trapper harvesting a wolf prevents these kinds of deaths
Over 100 wolves in Blackfoot Valley – a high density of wolves

Bob Sheppard
Ovando

Trapping takes a long time to learn
No one wants to be regulated or over regulated
Trapper Ed – MTA worked with FWP to develop FWP's program
Montana is huge and diverse
TAC needs to be careful about what they're doing

Tim McKendrick

MTA has a trapper ed manual – why reinvent the wheel
MTA helped FWP with their manual
There will not be agreement about trap checks
Trappers continue to learn their whole life. Bob Sheppard, aged 68, attended a trapping college at Purdue University

For Trapping Advisory Committee Public Comment 4/2/2019 Helena Montana
Unlike hunting and fishing which are held in high regard in our state, the TAC was formed to help reduce social conflict about trapping. The main objectives to trapping are said to be it is inhumane, indiscriminate, not highly regulated and not science based. For example, only 5 out of roughly 20 legally trapped species have a quota and mandatory reporting.
A question was raised what number of non-targets would be acceptable? I think a better question is how to increase their survivability and reduce injury? With 48 hour trap checks on

wolves, 16 mountain lions were reported caught in the wolf trap sets in 2 years. 1/3 were dead even with the required 48 hour trap check.

Speaking of wolves, on average 85 are reported trapped in Montana annually. This year 130 were reported trapped. 35% of the wolves killed came from Region 1. 90% of hunting units are reported over elk management objectives according to FWP. Elk are reported overall 46,000 over objectives. Even Region 1 is within the low end of objective numbers.

We have 2.6 million cattle. In 2018, 81 livestock kills and 2 dogs were attributed to wolves. I've heard from ranchers using non-lethal preventative methods and having zero losses to predators who don't want predators, wolves, near their ranch killed as it increases the risk of depredation by disrupting or removing packs. SB200 already allows landowners to kill wolves year-round that are deemed a threat.

I've experienced non-target trapped animals, i.e. a lion paw found in a trap set for wolves, a heron dead in a leghold set for beaver, by experienced trappers. This year we paid the medical bills for a lost dog, trapped, missing for 2 days. His leg had to be amputated. Maybe if traps had to be checked daily, the dog would not have lost his leg. Annually, I get calls on escaped trapped animals. How long were they trapped before they managed to escape with the trap? All the findings, science, recommendations and researchers support 24 hour trap checks to reduce suffering, injury and increase survivability, not 48 hours. See handout:

<https://tfmpl.org/featured/why-should-we-have-24-hr-daily-trap-checks> Various attempts to address animal welfare and trapping in Montana, i.e. through daily trap checks, trap modifications, have been shut down by trappers. Undoubtedly, snares and conibears will increase social conflict!

However, some trappers do check traps daily. 36 other states do it. Perhaps they should be asked how they do it, how they manage, how successful they are? Whether law enforcement is limited or not, law abiding citizens follow the laws even if they don't necessarily agree with them. Repeatedly, we heard all will be addressed in education and not necessary through regulation. The trapper education bill was killed because the non-consumptive user, the public majority was not welcomed even in an advisory capacity only as per statute. We continue to support trapper education with the Commissioner's oversight. If the proven methods to address animal welfare continue to be denied or optional at best and the public trust doctrine ignored social conflict will increase and the trappers themselves will be their own demise.

Thank you,

KC York

Trap Free Montana

Trap Free Montana Public Lands

From: Cynthia Speer

Sent: Friday, April 5, 2019 10:06 AM

To: FWP General <fwpgen@mt.gov>

Subject: Proposed trap check legislation

Dear Mr. Vore:

Please understand that no one cares more about checking their traps as frequently as possible than the trapper. These guys don't go to the trouble and expense of trapping and leave traps unchecked. I believe for the most part they are diligent because they care about the animals; but even if the only reason is to make sure they get to that valuable fur as quick as possible, they still check their traps as much as they can. I'm afraid the main goal of the people who are against trapping is simply to stop trapping. I also believe they don't understand the concept of predator control at all. Please don't discourage predator

control by weighing down trappers with unnecessary regulations. Thank you for your consideration,
Cynthia Speer, the wife of a lifelong trapper and Vietnam veteran
