

Fish and Wildlife Board Meeting Agenda

Wednesday, August 17, 2022

The Vermont Fish and Wildlife Board will hold an in-person meeting at 5:00 p.m. on Wednesday, August 17, 2022, at the National Life Dewey Conference Room in Montpelier.

To attend the meeting virtually via Microsoft Teams, click on the following link:

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Or call in (audio only)

[+1 802-828-7667,,754705903#](#) United States, Montpelier

Phone Conference ID: 754 705 903#

Agenda:

- 1) Approval of Previous Meeting Minutes.
 - May 18, 2022
- 2) Petition to change Trapping Rule, S. 201 (VT Wildlife Coalition)
- 3) Trapping BMP Update
- 4) Coyote Petition and Hunting Management Update
- 5) Bear Management Overview
- 6) Commissioner's Update

The mission of the Vermont Fish and Wildlife Department is the conservation of all species of fish, wildlife and plants and their habitats for the people of Vermont.

May 16, 2022

Re: Trapping rule changes per S.201



To Chairman Beibel, members of the Vermont Fish & Wildlife Board, and Commissioner Herrick:

VWC did not support or oppose this bill. Our general support of hunting does not extend to trapping in Vermont because trapping is almost unavoidably cruel and, in our view, has little if any ecological or societal benefit here. While the AFWA's BMPs and efforts coming out of this new law to make trapping *more* humane may make marginal improvements in animal welfare, it is hard to imagine how body-gripping, drowning, and foothold traps can ever be made simply humane as directed in Section 1 a. (2): "*criteria for adjusting or maintaining trapping devices so that they operate correctly and humanely;*"

Obviously, eliminating all cruelty is not possible, life is commonly cruel, and trapping can have specific and narrow applications in conservation, research, and public safety. However, we cannot countenance the cruelties of trapping when, as is often the case in Vermont, it amounts to little more than a hobby, thin rationalizations of how it serves conservation etc. notwithstanding.

From VWC's perspective, the goal of making trapping humane is well-intentioned but most likely doomed to frustration (*see attached 2, pages 8 -14, times to unconsciousness for various species in different traps, none of which even approach humane*). Others doubtlessly have other objections to S.201. However, all varied reservations aside, S.201 is what we all must work with. To that end, in the spirit of more humane treatment, VWC respectfully asks that you consider:

1. **Eliminating drowning sets.** Possibly the most evidence-backed, proven inhumane death is drowning. Ironic since drowning has often been (and still is) used as "euthanasia," but the common and rationalizing myth of a peaceful death by carbon dioxide narcosis was thoroughly debunked in Ludders et. al. 1999. In brief, the CO² concentration in the blood does not rise to the level necessary for narcosis until well after the animals (beavers, dogs, mink, otter etc.) become unconscious from hypoxia (oxygen depletion) – after a few to many minutes of suffering. As the authors wrote in their summary,

"... the concept of euthanasia is independent of traditions and convenience ... any technique that requires minutes rather than seconds to produce death can not be considered euthanasia." Nor would VWC contend, humane.

2. **Restore the exclusion of traps within 10 feet of beaver lodge entrances.** Prior to 2018, this exclusion was sometimes cited as an example of trappers' concern and respect for beavers. It has also been contended that the adult, parent beavers were at less risk from traps than inexperienced juveniles. With those contentions in mind, it was surprising to

read not only that the rule had been abolished, but the celebratory tone to the announcement from the FWD project leader in the 2018 Furbearers Newsletter. Given the previously touted merits of the exclusion and that a conibear 330 in the entrance of a beaver lodge puts all residents of the lodge at high risk, regardless of their age or experience (rather like shooting fish in a barrel), we ask you to restore the exclusion of traps within 10 feet of a lodge entrance.

3. **Return the end of the otter trapping season to February 28.** None of the rationales for the season extension have borne out. The principal reason given in 2017 by the then Commissioner was animal welfare. It was contended that offsetting the triggers on Conibear 330s to lessen the chances of otters being caught during March while the beaver season continued past the end of the otter season, caused the traps to sometimes fire late and not catch beavers properly, causing them to drown. It was claimed by the Commissioner at the time (not Commissioner Herrick), that properly caught, beavers died of carbon dioxide narcosis. This claim has been debunked for over 20 years. They nearly all drown or asphyxiate. The Department's estimate of the number of extra otters that would be killed in March was off by an order of magnitude. These points were not addressed when we petitioned the Board on this same issue last year. Instead, our concerns were dismissed with the assurance that the otter population was not threatened by the extended season. That the original stated reasons for the season extension turned out to not be true were treated as irrelevant.

Thank you,

A handwritten signature in black ink that reads "Rob Mullen". The signature is written in a cursive, flowing style.

Robert Mullen

Board Chair, Vermont Wildlife Coalition

Attached:

1. Ludders et. al. 1999
2. IAFWA research summary on trap performance for developing BMPs to maximize animal welfare.