



March 16, 2017

Vermont Fish & Wildlife Department & Board  
Re: Furbearer rule | trapper surveys

Dear Members of the Fish & Wildlife Department & Board:

I am following up on the recommendations I made to the Department and Board during the public comment period at the last Board meeting concerning the trapper mail survey. As I, and others, have experienced with previous public comment, it's unclear what types of discussions, if any, are had upon receiving public comment. Does the Board compile comments for future discussions and response to members of the public? Mark Scott mentioned that he wrote down my suggestions, but I haven't heard from anyone.

The trapper mail survey in its current form is grossly inadequate and leaves room for error. In the Fish & Wildlife Department's application to ICAR they state that the trapper mail survey can be completed "in only a few minutes", once a year. If the Department's goal is to collect thorough information to be used in furbearer research, how is it possible that a trapper mail survey should only take a few minutes to complete once a year? How does the Department expect to garner useful information from trappers who only dedicate "a few minutes" to this survey and how are trappers supposed to remember trapping details that occurred months prior?

We would like to recommend that for those trappers who use the internet, that a monthly online report is submitted to help ensure more accurate data. For those trappers who do not use the internet, we recommend that a report

Protect Our Wildlife  
PO BOX 3024  
Stowe, VT 05672  
[www.ProtectOurWildlifeVT.org](http://www.ProtectOurWildlifeVT.org)

be submitted at the close of land trapping, by no later than January 15<sup>th</sup>, and for trapping performed under the water/ice, a report be submitted no later than April 15<sup>th</sup>.

We would also like to see the town included, not just WMU, where the trapping took place, along with documentation of non-targeted and incidental takes. Non-targeted take of species represents a significant number of trapped animals, yet their deaths go unreported. The Department has no data on those foxes, beavers, raccoons and others who are trapped outside of the legal trapping season. With respect to incidental takes, if a trapper sets a trap for a coyote in October and traps a bobcat out of season, as we saw last year, why would you not want to capture that data in the survey?

Also, to encourage more thorough and accurate reporting, we recommend including a certification of truth, accuracy and completeness. All stakeholders who care about Vermont's wildlife should be willing to support each and every opportunity to collect the best data possible under the circumstances.

One should also note that currently, the Department requires all volunteer wildlife rehabilitators to submit monthly reports of all animals held under their care. It seems like a similar system should be instituted for trapping, to at the very least submit monthly reports of animals killed.

Lastly, since the Department does not maintain carcasses for the majority of furbearer species, would it be helpful if trappers submitted a tooth or other sample from foxes, beavers and other animals they killed?

Thank you for your attention. We would appreciate an acknowledgement and reply to our comments.

Brenna Galdenzi



POW President

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