

Public Comment Summary for June 2017 Trapping Proposal

Summary of Public Comments

FWP received and reviewed a total of 282 comments and letters.

Close to half the comments had some focus on wolves specifically.

160 comments (57%) identified as being against all trapping, most often describing the activity as “inhumane.” 78% of these were from outside of Montana. About 20% were one of several form letters. Several of these comments included language such as “torture,” “sinful,” “barbaric,” “sadistic,” “ignorant,” and “criminal.” One comment was threatening.

Of these 160 comments where it was clear that the person was against all trapping in general, 80% did not express an opinion on the specific issues in the proposal. Therefore, nearly half the public comment seemed to be an expression of the desire to simply eliminate trapping.

Of those who oppose trapping in general that did express an opinion on proposal specifics, 100% were in favor of a 24-hr check, and 100% were in favor of the proposed Modifications. When an opinion was expressed on the subject, this group was against Mandatory Education by a 4:1 margin. The most frequent reasoning given for opposing Education was that a class that included involvement by the Montana Trapper’s Association would be “unfair to non-consumptive users.” Most of the comments that opposed Mandatory Education appear to have initiated from a form letter by Wolves of the Rockies.

43 comments (15%) were from trappers, all but two from Montana. Of those who identified as trappers, 86% were for Mandatory Education, 83% were against Modifications, and all were against a 24-hr check. Many expressed that Mandatory Education and recommendations by FWP (rather than regulation) was the best way to achieve more the humane treatment of animals that Modifications and a Check-time are targeted toward.

Of those who did not specifically identify as a trapper or as being against all trapping in general, about half were for and half against Mandatory Education, about half were for and half against Modifications. 83% of this group expressed support for a 24-hr trap check.

99.9% of Montanans did not comment on this proposal.

Recommendations:

Mandatory Education

Mandatory trapper education should move forward as outlined. Developing and implementing a world-class program will be a serious and demanding undertaking and should be given high priority during the coming year. When done well, this program will improve many aspects of trapping in Montana for decades, including minimizing capture of non-targets and use of best practices (equipment and checks) that result in humane treatment of captured animals.

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Suggest striking the requirement to take the class again if a person has not purchased a license during the last 5 years. Several questions about exactly who does and does not have to take the class indicates the need to clarify in a succinct manner and via FWP media.

Modifications:

Retain the requirement for swivels as is. This modification is inexpensive and beneficial, and it did not receive any significant opposition. Strike the requirement for offsets and thicknesses. The details of these elements have not been thoroughly discussed and considered. They are expensive and time-consuming to implement, and thus any regulations that may arise regarding these elements should be based on a fully informed and exhaustive discussion prior to requiring specific changes.

It is important to note that the Association of Fish and Wildlife Agencies makes clear that their Best Management Practices were developed to be utilized as recommendations and not as the basis for regulations. If Montana moves to require elements identified as positive in the trapping BMP's, Montana will be moving toward a system that is used in Canadian Provinces where there is a list of approved traps.

Check Time

FWP should have a maximum time allowed legally between trap checks as a means of dealing with the occasional instance of negligence. Such a regulation would allow enforcement to pursue clear cases of negligence and would likely encourage reduced trap check intervals for some who currently check at "too long of an interval."

Of course, "too long of an interval" is subjective and dependent on an individual's judgement of what is ethical. Clearly there are wide and divergent opinions among the public regarding what is ethical or "too long of an interval." For some, any instance of trapping at all is unacceptable and unethical treatment of animals. For others, some of whom are trapping for purposes of reducing impacts of predators on livestock and livelihoods, the intent and need is to kill the animal by whatever means possible. Most who are trapping classified furbearers do not fall into either of the aforementioned categories. Perhaps for most Montanans, a group that did not comment on this proposal, the ethics of how long is too long to have an animal in a trap is a personal and individual decision that varies. An individual's judgement on how long is too long may also depend on situational specifics such as the likelihood of a capture, weather, or personal risk. FWP biologists and the Fish and Wildlife Commission have for many decades seemed to hold this flexible view that depends on personal ethics, having instituted a recommendation for a 48 hour check.

It should also be noted that a check time regulation will be very difficult to enforce. It is simply not feasible for FWP enforcement to "have a stopwatch ticking" on all trap-lines or even many trap-lines. Thus the effectiveness of a check-time toward achieving its desired outcome must be weighed against the pros and cons of other approaches.