

MONTANA FISH, WILDLIFE & PARKS HUNTING SEASON / QUOTA CHANGE SUPPORTING INFORMATION

Species: Furbearers, predators (coyote, weasel, skunk), wolves, fox, badger and racoon.

Region: Statewide

Hunting District: All

Year: 2017

1. Describe the proposed season / quotas changes and provide a summary of prior history (i.e., prior history of permits, season types, etc.).

FWP proposes to:

- 1) Beginning in 2018, establish a **Trapper Education Program and Mandatory Trapper Education requirement** for people trapping furbearers*, predators (coyote, weasel and skunk), wolves, fox, badger and racoon. People required to attend and complete a state-sanctioned trapper education course include those:
 - born after January 1, 1985, or
 - purchasing a Montana trapping license for the first time, or
 - who have not purchased a trapping license during the previous five license years, or
 - convicted of violating FWP trapping regulations

State-sanctioned trapper education courses from other states taken before 2019 meet the education requirement.

To trap wolves in Montana a person must attend and complete either the Idaho or Montana wolf trapping certification class. Montana's trapper education course proposed here will cover wolf trapping and meet this requirement. In the future there would not be a separate wolf trapping course.

Implementation will be phased in. Mandatory trapper education will be required of all first-time trappers to purchase a 2018-19 license and all others meeting the above criteria to purchase a 2019-20 license.

*Furbearers include beaver, otter, muskrat, mink, marten, fisher, wolverine, bobcat, swift fox and lynx.

- 2) By the 2019 trapping season require **Modifications** to ground-set foothold traps set for the above species that include a center swivel, an additional chain swivel, and jaws with minimum offset and thickness.

Persons trapping for purposes of livestock or property protection would be exempt from these requirements.

The proposed changes represent a significant impact to trappers, on the order of \$350,000 - \$2.3 million along with approximately 57,000 hours of time modifying or replacing traps.

Trapping is integral to managing many Montana wildlife populations. It is also a valued economic and recreational activity that is part of an outdoor heritage that defines Montana's culture. FWP reconfirmed trapping's importance to Montana's wildlife management in the recently completed "15 and Forward" initiative. A significant number of Montanans agreed when they rejected a 2016 ballot initiative to ban trapping on public lands. Public support for well-regulated trapping is rooted in Montana's history and culture and the belief that regulations are science-based with broad compliance. The proposed changes to Montana's trapping regulations are intended better articulate and incorporate into Montana's regulations the current ethical standards and practices associated with trapping.

This proposal aligns with the recommendations of the Montana Trappers Advisory Committee. This diverse group of 10 citizens was appointed in 1999 by FWP's then-Director Pat Graham. The Committee worked for 6 months and held public meetings throughout Montana to develop recommendations to minimize conflicts between land-use practices, outdoor recreation, and trapping practices. Many of the committee's recommendations have already been implemented. These include recessed triggers for large ground set conibears, setbacks from trails and campgrounds, break-aways on snares, trap-free areas, and support for the 2004 Preservation of Harvest Heritage amendment to the Montana constitution. Two major recommendations of the TAC – mandatory trapper education and trap modifications – have not been implemented yet, but are addressed in this proposal.

A mandatory trap check time was also considered but rejected in favor of the current recommended 48-hour check as was recommended by the Montana Trappers Advisory Committee.

This proposal only addresses mandatory education and trap modification requirements. FWP may propose other changes to the furbearer and trapping regulations, seasons and quotas in separate proposals.

Montana's Proposed Trapper Education Course

Trapping is an activity with centuries of history and a vast amount of information related to the development of tools and techniques. To trap efficiently and humanely, trappers must understand how to use equipment properly, what techniques will best restrain target species while avoiding others, and how to properly handle harvested animals. Trapping is an art mastered only by those with first-hand knowledge of the habitats, habits, and behaviors of each species. A lifestyle that retains a close association with wild animals and time in the outdoors is a large part of what attracts many to trapping. The skill required to effectively and ethically trap in modern Montana is difficult to acquire

without mentorship. Formal trapper education is a critical tool for fielding trappers who are effective, humane, and capable of avoiding unintentional catches.

At present in Montana, any citizen, regardless of experience, is eligible to purchase a trapping license and set traps. Yet, in today's modern and increasingly urbanized world, many new trappers will not have had the opportunity to accompany an experienced trapper on a trapline and may not have access to the most up-to-date information and equipment. Thus, the knowledge needed to trap effectively and ethically and to avoid social conflicts can be difficult to obtain. This can occasionally result in uninformed and poor choices that lead to unintended captures or unnecessary injury to captured animals. Although these incidents are rare, even single high profile events can diminish public support for regulated trapping. A comprehensive and mandatory trapper education program can give new trappers the skills and ethics that could otherwise take years to acquire, and such education will help avoid mishaps. In addition to practical skills, a trapper education course can teach students to think independently and apply high ethical standards in all situations, even beyond those defined and required by regulation. Lastly, a trapper education course can help pair new trappers with more experienced trappers that are willing to mentor.

Beginning with the 2018 trapping season for first-time trappers, and in 2019 for others, to trap furbearers, predators (coyote, weasel, skunk), wolves, fox, badger, and racoon in Montana a person

- born after January 1, 1985, or
- purchasing a Montana trapping license for the first time, or
- who has not purchased a trapping license during the previous five license years, or
- convicted of violating FWP trapping regulations

must attend and complete a state-sanctioned trapper education course. A state-sanctioned trapper education course taken prior to 2019 from another state will meet this requirement. Persons trapping for purposes of livestock or property protection would be exempt from this requirement.

To trap wolves in Montana a person must attend and complete either the Idaho or Montana wolf trapping certification class. Montana's education course proposed here will also cover wolf trapping and meet this requirement. In the future, there will not be a separate wolf trapping course.

Montana's wolf trapping certification does not cover the full-breadth of information that will be covered in the trapper education course and therefore does not fulfill this proposed trapper education requirement.

Outside of livestock or property protection, persons targeting species that do not require a license (coyote, weasel, skunk, fox, badger and racoon) would be required to have in their possession certification of having successfully completed a trapper education course.

Houndsmen and others who would be hunting, calling and free shooting bobcats, and who will not otherwise be trapping, although required to buy a trapping license, are not required to attend mandatory trapper education.

It is highly recommended that FWP employees that engage with the public on trapping such as biologists and wardens also take the class.

General Structure of Course

Goal: To field ethical trappers who are well-prepared to trap safely, humanely, and effectively.

Timing of Implementation

Given the timing of FWP commission meetings and potential finalization of this requirement no earlier than August 2017, it is not possible to implement a mandatory trapper education program prior to the 2017 license year. We propose implementing the requirement for mandatory trapper education for all first-time trapping license purchasers by the 2018 license year, and for all others required to take the class by the 2019 license year due to the time required to begin implementing the class successfully and the volume of attendees.

Delivery

The proposed course would be delivered in two stages, 1) a “Basics Course” and 2) a “Field Day Course” that focuses on active, hands-on participation and peer-to-peer interactions. Ethics will be emphasized in both stages. The Basics Course would be available either online or hard copy. The Basics Course would require students to read materials and pass a test, and must be completed prior to participating in the Field Day Course. The Basics Course will provide students with a general understanding of all topics so that the instructor’s time and hands-on expertise during the field course can be used more efficiently. The Basics Course could be completed at home at the student’s convenience.

A one-day Field Course would be offered in each FWP region annually, and require the student to travel to a specific location on a weekend. July and August are the targeted dates for field courses, but willing and certified volunteer instructors could offer classes at any time of year. Field Day Courses would be team-taught by at least 2 Certified Volunteer Instructors. Course sign-up would be administered by FWP using an online system. A paper hard copy registration option would be available. Certificates of completion would be issued upon successful completion of the Field Day Course.

Volunteer Instructor Certification Requirements

- Submission of the Trapping Instructor Application Form.
- Adult instructors must be at least 18-years-old; Junior instructors at least 14-years-old.

- Successfully pass a background check (Junior instructors excepted)
- Verification that the applicant has reviewed Trapper Education Program Policy and Procedures Manual.
- Complete an online training course designed to help new instructors learn effective teaching styles and methods. This course typically takes 3-5 hours and can be completed incrementally at the person's own pace. The online course is meant to establish a base knowledge for the volunteer instructor to build instructional skills. Each Instructor will develop a personal teaching style while incorporating the skills and methods from the online training.
- Applicants have one year to complete the online training. However, we recommend this be completed as soon as possible after receiving the initial acceptance letter.
- Complete a trapper education course, apprentice-teach with a certified instructor for at least 2 full trapper education courses and be recommended for certification by that instructor.
- Once certified and to remain so, an instructor must teach or assist in at least one class during any consecutive two-year time period.
- Attend the annual spring workshop like those for hunter/bowhunter instructors hosted by FWP in the area.

Volunteer Instructors

We expect enough qualified volunteer trapper instructors will be available within each FWP region each year (minimum of 14, with 2 from within each FWP region). If at some point there are not enough volunteer instructors, FWP would be obligated to provide classes. This could necessitate FWP personnel be certified with appropriate training, certification, and budget. If faced with an instructor shortage, FWP could be forced to an online-only course.

Trapping Basics Course Elements

The Basics Course and Test will be available on-line or by hard copy and can be completed at the student's convenience.

- Trapping Ethics and Responsibility
- History and Benefits of Trapping
- The Trapper's Role in Wildlife Conservation
- Trapping Equipment
- Montana's Furbearers
- Trapping Sets (Land and Water)
- Humane Treatment of Animals
- Running a Trapline
- Diseases, Parasites, and Safety
- Caring for Fur

- Trapping Regulations
- Trapping Legislation and FWP Commission Processes
- Representing Trappers to the Public

Field Day Course Elements

The Field Day Course will be approximately 8 hours and will be conducted in-person.

- Trapping Ethics and Responsibility
- Furbearer Habitats, Sign and Behaviors
- Trapping Equipment and Use, Humane Standards, Anchors
- Trapping Sets (Land and Water)
- Avoiding Non-target Catches, including dogs
- Checking Traps in a Timely Manner
- Caring for Fur and Fur Sales
- Representing Trappers to the Public

Future Modification of Trapper Education Course

A “Montana Trapper Education Advisory Committee” (MTEAC) would be formed to regularly assess and improve the course. The MTEAC will be made up of 3 active, certified Trapper Instructors and 3 FWP staff. Instructor representatives will be selected by their peer instructors, and FWP representatives will include the Education Program Manager, the Carnivore/Furbearer Coordinator and another Wildlife Division person. The MTEAC will be advisory to FWP, whose staff and director oversee the course. The MTEAC will of course be subject to state statute and FWP Commission rules and will be coordinated by FWP staff.

Funding

Use of Pitman-Robertson funds is permissible for a trapper education program. These federal monies require a match of 1 non-federal dollar to every 3 federal dollars. Volunteer Instructor time qualifies as a non-federal contribution. Therefore, instructors will be required to keep records of time spent on the trapper education program so that their time can be used to match PR funds.

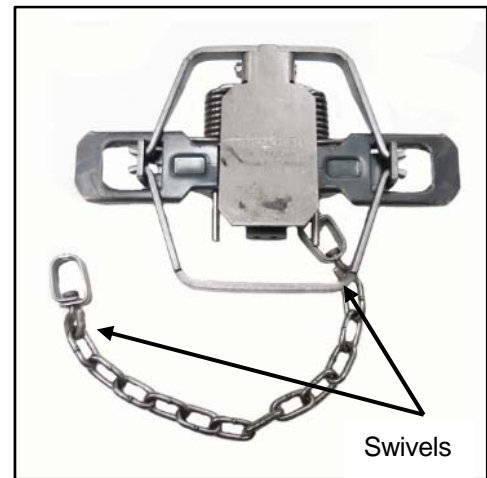
Trap Modifications

Montana currently has few regulations mandating the use of certain trap features that have been scientifically demonstrated to reduce injury while maintaining the trap’s ability to effectively restrain an animal. Recognizing that these modern features maintain trap efficiency and improve animal comfort after capture, many trappers voluntarily update or replace older traps. Because there is at present no mandatory trapper education program discouraging use of substandard equipment, and substandard equipment is legal, widely available, and often less expensive, some use of these traps continues despite the more modern designs’ clear benefits.

Over the last 20 years the Association of Fish and Wildlife Agencies (AFWA), in cooperation with independent researchers, have extensively tested various trap designs and drafted a series of Best Management Practices (BMPs) for trapping equipment. These recommendations include trap designs that are efficient and reduce animal injuries. The various sizes of foothold traps recommended to humanely restrain a wide variety of species shared three important design features: the traps should be fitted with center or near-center swivels and jaws with sufficient thickness and offset (gap). We propose to require that all non-lethal ground-set foothold traps set for furbearers, predators (coyote, weasel and skunk), wolves, fox, badger and racoon be equipped or modified to include these features beginning with the 2019 license year. Rubber padded jaw traps would require swivels and thickness modifications but not offsets.

Minimum of Two Swivels

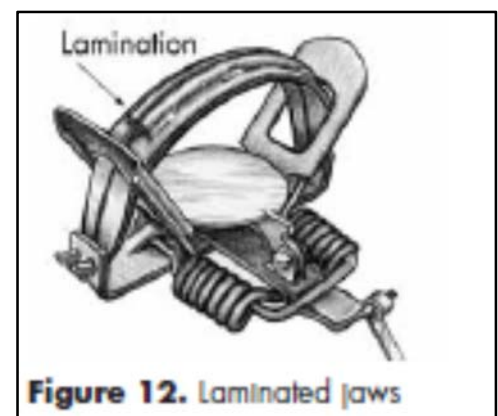
Swivels allow rotation and greatly enhance freedom of movement thereby reducing injury and increasing comfort of trapped animals. Swivels also reduce damage to fur and equipment. At minimum, a trap must be equipped with at least two swivels: 1) a center or base-plate swivel located on the underside of the trap as close to the center as the trap design reasonably allows, and 2) another swivel located near the opposite end of the chain. Quality swivels capable of holding the largest species that might be captured are critical.



While many Montana trappers already incorporate these swivels, adding an attachment point (if one is not present) and swivel on a trap's base plate could cost between \$ 0.35 and \$1.50 per trap and take 10 minutes to install.

Jaw Thickness

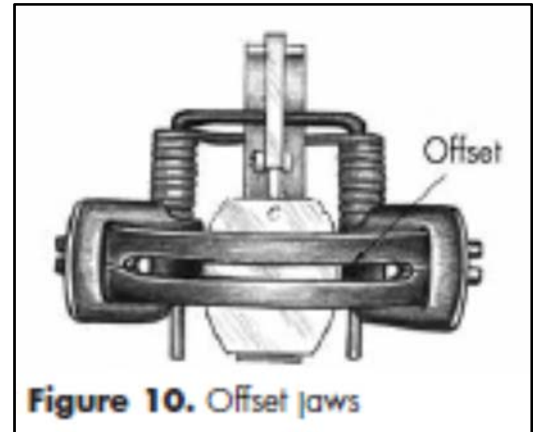
Traps with thick jaws, often referred to as laminated jaws, have an increased surface area where the jaw contacts an animal. Thicker jaws disperse the energy across a larger area when closed, resulting in fewer injuries and increased animal comfort. Traps with thicker jaws also increase capture efficiency. Trap jaws may either be manufactured with the required thickness or later modified by attaching additional strips of metal to the jaws ("laminating").



While many Montana trappers already incorporate appropriate jaw thicknesses or lamination on their traps, modifying existing traps to meet jaw thickness requirements (Table 1) will cost trappers an estimated \$1.00 - \$3.00 and take 15 minutes per trap. Purchasing new traps that meet the requirements will cost significantly more.

Offset Jaws with Rounded Edges

Traps with offset jaws have a gap between the gripping surfaces when the trap is closed. Rounded edges have been lightly filed so that the edges are not sharp. Rounded edges are not a substitute for offset jaws. Recommended offset widths range from 1/8 to 1/4 inch, depending on the trap size (Table 1). When the jaws of a trap are closed on a foot, offset jaws allow the trap’s springs or levers to more fully extend upward, which keeps the animal’s foot more stationary in the trap so that there is less back-and-forth movement which reduces injury. The offset also allows greater blood flow to the captured foot. Commercially produced rubber padded jaw traps do not need offsets.



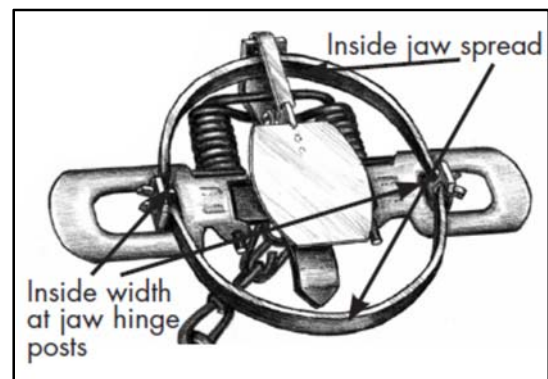
While many Montana trappers already use traps with offset jaws, replacing standard-jaw traps with new, offset-jaw traps could cost \$5 - \$35 per trap, depending on size and specifications (Table 1).

Overall, these regulations would have a significant impact on trappers. While it is not known how many traps Montana trappers own, 5,000 licensed trappers with an average of 20 traps would see an impact of somewhere between \$350,000 and \$2.3 million along with approximately 57,000 hours of time modifying or replacing traps. These figures are based on individuals welding their own traps and could be substantially higher if individuals hire the welding out. Additionally, some trap modifications may require other trap modifications to maintain the trap’s effectiveness. For example, additional jaw thickness may then require additional spring strength.

Table 1. Montana proposed minimum required trap offsets and thickness in inches as supported by Association of Fish and Wildlife Agencies Best Management Practices.

Trap Size*	Minimum Offset	Minimum Thickness
<4½	1/8	1/8
4½ - 6 ⅛	3/16	3/8
≥ 6 1/8"	1/4	3/8

* Inside jaw spread of the open jaws measured perpendicular to the base plate and hinge posts.



Summary of Approach

Overall, the proposed changes of initiating a Mandatory Trapper Education Program and requiring certain Trap Modifications are positive additions to Montana's trapping program. These significant changes are programmatic milestones. We believe these proposed actions will pay off for years to come and will lead to the best overall long-term benefit to the species of concern and to trapping itself. This approach contains significant and positive changes no matter the individual viewpoint on trapping in general. This approach respects the concerns some have over trapping as well as the values and beliefs of trappers that can also help FWP and the resource in other significant ways. This approach, and trappers' support of changes that will cost them between \$350,000 and \$2.3 million along with approximately 57,000 hours of time, is evidence that Montana's trappers are interested in and capable of building a trapping program that is informed and progressive.

2. What is the objective of this proposed change?

The objective of this proposal is to improve Montana's trapping program, reduce non-target captures, improved animal welfare, and increased involvement in and support for trapping in Montana, by requiring mandatory trapper education and improving traps by using the latest scientific information from the Association of Fish and Wildlife Agencies' trapping Best Management Practices. A side benefit will be to better articulate and incorporate into regulation Montana's ethical standards and practices associated with trapping.

3. How will the success of this proposal be measured?

This proposal will be considered successful upon 1) establishment and implementation of a Trapper Education Program that is administered by the state of Montana and supported by volunteer instructors, and 2) implementation of trap modifications by the 2019 trapping season. Long-term success can be measured with numbers of individuals successfully completing trapper education and proportion of individuals checked who are complying with modifications. While difficult to measure, we expect the trap modifications and the education program's emphasis on trapping ethics and Best Management Practices will reduce non-target captures, improve animal welfare, and increase involvement in and support for trapping in Montana.

4. What is the current population's status in relation to the management objectives?

Not applicable.

5. Provide information related to any weather/habitat factors, public or private land use or resident and nonresident hunting opportunity that have relevance to this change (i.e., habitat security, hunter access, vegetation surveys, weather index, snow conditions, and temperature / precipitation information).

These regulations would have a significant impact on trappers. While it is not known how many traps Montana trappers own, 5,000 licensed trappers with an average of 20 traps would see an impact of somewhere between \$350,000 and \$2.3 million along with approximately 57,000 hours of time modifying or replacing traps. These figures are based on individuals welding their own traps and could be substantially higher if individuals hire the welding out. This level of impact to trappers is the reason for requiring the trap modifications by the 2019 season.

6. Briefly describe the contacts you have made with individual sportsmen or landowners, public groups or organizations regarding this proposal and indicate their comments (both pro and con).

We have worked with the Montana Trappers Association and Montana Fur Harvesters over the last six months. These organizations volunteered many hours to provide valuable input on trapping and its practice in Montana and trap details related to this proposal. Both organizations oppose a mandatory trap-check time.

Others of the public have expressed concern over no mandatory trap check time, non-target captures and animal welfare.

Submitted by: Bob Inman, Carnivore/Furbearer Coordinator, May 22, 2017

Modified and Approved by: John Vore, Game Management Bureau Chief, May 22, 2017

Reason for Modification: Other than minor grammar and punctuation changes, the principal modification was in the answer to question 6 to clarify what we have heard from the Montana Trappers Association, the Montana Fur Harvesters, and others in the public.