



FISH AND WILDLIFE COMMISSION
BEFORE THE ~~DEPARTMENT OF FISH, WILDLIFE & PARKS~~
OF THE STATE OF MONTANA

In the matter of the adoption of New Rule) RULEMAKING PETITION
pertaining to the requirement of trappers)
to physically check all traps and snares)
regardless of species pursued every 24)
hours on public lands within the State of)
Montana)

TO: All Concerned Persons

Petitioners:

Footloose Montana, Anja Heister, PhD, Co-founder and Executive Director, PO Box 8884, Missoula, Montana 59807.

Gallatin Wildlife Association Clint Nagel, board trustee and president, P.O. Box 10571, Bozeman, MT 59719.

Founded in 2007, Footloose Montana ("Petitioner") is a Montana-based, nonprofit organization dedicated to ending the cruelty and destruction of recreational trapping on Montana's public lands. We represent supporters throughout Montana and across the United States who value wild animals for their ecological, scientific, educational, recreational, aesthetic, and intrinsic importance. Most of our supporters are Montana residents who regularly recreate on public lands, including wildlife watchers, hikers, skiers, hunters, photographers, veterinarians, scientists, educators, business owners, and citizens concerned about the suffering of wild animals in traps and snares.

Since its founding in 1976, the Gallatin Wildlife Association ("Petitioner") has been dedicated to the preservation and restoration of wildlife, fisheries, habitat and migration corridors in Southwest Montana, the Greater Yellowstone Ecosystem and the northern Rocky Mountains using science-based decision making. GWA recognizes the intense pressures on our wildlife from habitat loss and climate change, and we advocate for science-based management of public lands for diverse public values, including but not limited to hunting and angling.

Petitioners are seeking ways to reduce the suffering, injuries and death of trapped animals, and incidence and frequency of non-target capture of furbearing species, non-game and predators, protected species, ungulates, eagles and other birds, wolves, and domestic dogs. The Montana Constitution guarantees citizens the right to a clean and healthful environment. This includes healthy populations of furbearers, game species, non-game species, and predators. Every species contributes essential benefits to healthy ecosystems. As supporters of all Montana wildlife, the Petitioners are impacted by each 'targeted' and 'non-target' animal's suffering, injury and mortality in traps and snares.

The requested change of rule is needed for the following reasons:

1. **Adoption of a mandatory 24-hour trap-check interval would complete an important reform first advanced more than two decades ago:** In 2005, then Representative Gail Gutsche introduced House Bill 603, which proposed comprehensive modernization of Montana's trapping regulations, including mandatory trapper education and consideration of mandatory trap-check requirements. Although HB 603 was tabled in the FWP House Committee, several reforms proposed in HB 603 have since been implemented, but the recommendation for a uniform, mandatory statewide trap-check standard remains unfulfilled.

Legislature: Following Rep. Gutsche's 2005 HB 603, Rep. Bridget Smith, R-Wolf Point, requested a mandatory 24-hour trap check in 2019. This bill, HB 287, was tabled in the FWP House Committee.

Trapping Advisory Committees (TACs): The need for mandatory trap checks has been an issue of concern and discussed at FWP's Trapping Advisory Committees (TAC) throughout the years. Members of the TAC 2018 identified several guiding principles such as, "traps should be checked regularly," and "... that checking traps could decrease animal capture trauma."¹

Nonprofit organizations: In 2018, the National Resource Defense Council (NRDC) submitted a petition² to FWP and provided resources to the TAC, requesting a 24-hour trap check for all traps and snares regardless of species pursued by trappers. The letter was signed by a long list of organizations, including Footloose Montana and individuals. The Montana Fish & Wildlife Commission ultimately rejected the petition. Organizations such as Footloose Montana have repeatedly urged the Commission to adopt mandatory trap-check requirements through public comments, petitions, educational outreach, and public participation. These efforts have consistently emphasized the need for reducing unnecessary animal suffering, improving protection for all trapped animals (target and non-target animals), and for public safety regulations such as requiring trappers to post Notices in public areas when trapping is active. None of these efforts have been approved either by the legislature or the FWP Commission primarily because of trappers' opposition.

2. **Montana remains one of three states without general trap check requirements.** The other two states are North Dakota and Alaska. Exceptions in MT are a 48-hour mandatory trap check for bobcats in Lynx Protection Zones (LPZs) and wolves. Every other US state that allows recreational trapping requires that traps and snares be regularly inspected.
3. **Daily trap check requirements are common.** Thirty-six states have adopted 24-hour or daily trap inspection requirements³ for at least some types of traps or trapping situations. These include western states like Washington, California, Arizona, New Mexico, and Colorado.
4. **The Scope of Animals caught in traps and snares:**

Every year, Montana trappers *reportedly* kill at least 50,000 wild animals caught in leghold traps, Conibear traps and snares, including neck snares. These are the number of animals reported by a mere one-third of licensed trappers who responded to a voluntary survey. Considering the poor response rate lack of monitoring trapping activities, it is reasonable to assume that the death toll of animals caught in traps is likely three times as high, bringing the total number of trapped animals to an annual 150,000 animals.⁴

Reduce suffering of animal mothers and starvation of dependent young. When mother animals remain trapped for extended periods, dependent offspring may die from starvation, exposure, or predation. A 24-hour trap check would reduce the time a mother is separated from her dependent young.

5. Scope of Non-target Animal Captures:

- A fraction of the number of non-target animals maimed and killed in traps is reported. Trappers refer to nontargets as “trash animals” not worth keeping. The unwanted animals are killed and tossed, and the traps reset. Between 2010 and 2014, the following non-target animals were reported caught, injured and/or killed in traps and snares: 89 mountain lions, 12 black bears, three grizzly bears,* four wolves, 21 bobcats, 31 river otters, four wolverines,* three lynx,* three fishers,* nine deer, one elk, one pronghorn antelope, five raptors,* ten badgers, 58 dogs, among other species.^{5,6} (*An asterisk denotes federally protected species.*)

Between 2012 and 2024, FWP documented 1,191 non-target animals caught in traps, including furbearers, threatened and endangered species, non-game wildlife, deer, moose and elk, raptors, grizzlies, and a high number of mountain lions and domestic dogs.^{7, 8} At least 27 grizzly bears have been reported caught in traps and snares set for wolves and coyotes in Montana (Montana Fish, Wildlife & Parks). Declaration of Ken McDonald, pgs 14-16; State of Montana Defendant’s Response to Plaintiff’s Statement of Facts, page 42 *Flathead-Lolo-Bitterroot Citizen Task Force et al. v. State of Montana. CV 23-101-M-DWM*. These are just the reported incidents.

- In a 2024 letter to the F&W Commission, Christopher Serveheen on behalf of the Montana Wildlife Federation writes that between 2018 and March 2022, FWP has documented “... at least 306 records of non-target captures of animals in foothold traps, snares, and conibear traps. These are likely only a small portion of the actual number of such non-target captures that occurred during this 5-year period ... This information clearly shows that traps and snares are a danger to non-target wildlife and particularly to domestic dogs whose owners take them for walks on public lands along public roads.”⁹ The Non-target Animal Captures included 91 mountain lions, 123 domestic dogs (49 severely injured and 4 had died), 5 fishers, 5 wolverines, 6 bobcats, 9 otters, and 11 deer along with numerous other species like black bears, grizzly bears, bald and golden eagles, moose, and a great horned owl. Two whitetail deer were reported captured in wolf neck snares and both strangled to death. On

average 35% of the non-target captures were reported to be dead and most of those 65% alive were injured in some way.

- Requiring traps to be checked every 24 hours would increase the chances that ESA protected species, game species and domestic animals could be released less seriously injured and alive.

6. Lax reporting requirements, most Non-target Animals not reported:

- Retired government trapper Carter Niemeyer testified that "Based on my conversations with various members of the trapping community, many trappers will not report incidental captures out of fear that these reports will result in increased regulation of trapping activities" (Declaration, p.17; Expert Disclosure, p. 11).

- With respect to wolf trapping alone, a 2022 study concludes that, in part because of a lack of data transparency, and also because some traps may be lost or are not checked, it is hard to quantify the full extent of nontarget animals' deaths that occur in traps set for wolves.¹⁰

- Montana's non-target animals are rarely reported, unless they are endangered species or dogs, which are required to report. FWP records therefore reflect only a fraction of non-target animal captures. FWP acknowledges that this data set "leads to an undercount of the incidents of nontarget captures."¹¹ Yet the agency regularly asserts that annual Non-target Animal Captures do not threaten wildlife populations. This conclusion is unsupported and fails to account for the full ecological and other harms caused by trapping, the extent of which remains unknown. The lack of required reporting of trapped animals undermines scientific wildlife management, forcing FWP to operate on unreliable hearsay.

7. Field Professionals Support 24-hour Trap Check

Dick Randall

In his 1975 statement submitted to Congress, former governmental trapper Dick Randall wrote: "The leg-hold trap ... is probably the most cruel device ever invented by man and is a direct cause of inexcusable destruction and waste of our wildlife.-Even though I was an experienced, professional trapper, my trap victims often included non-target species such as bald and golden eagles, a variety of hawks and other birds, rabbits, sage grouse, pet dogs, deer and antelope, badger, porcupine, sheep and calves....My trapping records show that for each target animal I trapped, about two unwanted individuals were caught. Because of trap injuries, these non-target species usually had to be destroyed."¹²

Bill Randall

Former Maine trapper Bill Randall stated, "...after reading the report by an Maine Inland Fisheries and Wildlife (IF&W) biologist that 70 percent of the neck snared coyotes struggled for up to three days and died only after their brains exploded from blood

abundance—something known as 'jellyheads'—I had to speak out ... It is not unusual to see just a muskrat's foot in a steel trap, even though we knew as trappers that muskrat and beaver traps must be set to ensure quick drowning. I've seen numerous skunks in my land traps that had chewed off a foot. I should mention that a foot was all that was left in the only steel-jawed trap I ever set for a bear."¹³

Randall stated, "I also know that traps and snares are not selective and often times catch non-target animals. Regardless of trapper skills, any trap, foot or killer-type or snares, can and do catch all birds and beasts, wild and domestic."¹⁴

Carter Niemeyer

An expert in trapping and injuries and death suffered by animals as a result of being caught in traps and snares, Carter Niemeyer started trapping wild animals both privately and professionally in 1973. For 25 years he worked as a trapper and supervised trapping activities for the Animal Damage Control program of Wildlife Services, an agency within the U.S. Department of Agriculture. He has been a consultant and private contractor with state fish and game agencies, Indian tribes and non-governmental organizations and provides mentoring, instructional training, and advice in the capture, handling, radio collaring, and tagging of gray wolves. His work includes the use of foothold traps, methods of setting traps, immobilization techniques, and monitoring techniques. He has trapped or snared thousands of animals for fur, control and research purposes including wolves, grizzly bears, black bears, bobcats, coyotes, foxes, muskrats, beavers, mink, racoon, badgers and opossums. He has assembled, disassembled and modified thousands of foothold traps, neck and foot snares. (Declaration of Carter Niemeyer 2023 Pages 1-2; *Flathead-Lolo-Bitterroot Citizen Task Force, et al. v. State of Montana CV 23-101-M-DWM*).

Mr. Niemeyer has observed, skinned, processed, and/or necropsied roughly 6,000 wolves, coyotes, bobcats and foxes for pelt and fur salvage; for the fur market; and for state, federal and tribal agencies. These experiences have made him acutely aware of the lethal and non-lethal effects that traps and snares can deliver. He has observed the often-significant physical effects of different types of traps and snares on animals, and he has performed necropsies to examine animals after they were killed in traps and snares. He was one of the individuals that the U.S. Fish & Wildlife Service asked to review and provide input to help reduce the risk of incidental take of lynx from trapping. Mr. Niemeyer's experience and expertise has found that neck snares are non-selective and indiscriminate by design and will capture, hold, or kill non-target or unintended species. (Declaration of Carter Niemeyer 2023 Pages 1-3; *Flathead-Lolo-Bitterroot Citizen Task Force, et al. v. State of Montana CV 23-101-M-DWM*).

Mr. Niemeyer has testified that injuries caused by foothold traps and neck snares can vary from rapid mortality to injuries that kill or impair the animal after release, as well as lacerations and blunt force trauma. Traps and snares by their very nature and function cause compression or constriction injuries that can damage tissue, restrict vascular flow, and can have harmful effects beyond the extremity that is actually constricted. The

physiological effects of stress, trauma, desperation, and shock can also cause death after release. Toxins can be released into the blood system after traps and snares are removed, resulting in organ damage and death. Other injuries from traps and snares include bone fractures, sprains, dislocations, tooth and gum damage from biting the traps and snares, hypothermia or hyperthermia, and dehydration. Bone fractures to the phalanges and legs can be debilitating and result in death (Declaration of Carter Niemeyer, p. 13; Expert Disclosure of Carter Niemeyer, p. 8, Deposition of Carter Niemeyer, 2023, 2024, *Flathead-Lolo-Bitterroot Citizen Task Force, et al. v. State of Montana CV 23-101-M-DWM*; Expert Disclosure, pgs. 11-12).

Mr. Niemeyer has found significant impacts on animals from trapping or snaring including the loss of digits in paws; neck snare injuries including “waterhead” injuries, meaning catastrophic edema; and neck snare injuries such as snares cutting through flesh, which causes bleeding and leads to eventual death of the animal. (Expert Disclosure, p. 12).



2015: A severed mountain lion paw in a wolf trap reported by Cal Ruark, then president of the Bitterroot Houndsmen Association (Missoulain article). Trapped animals often chew off feet or “wing off” entire limbs to escape the pain and panic, only to die slowly of infection and starvation.

One of the most important factors in determining the extent to which a trapped or snared animal is injured is the amount of time she or he spends in a trap or snare, according to Neimeyer. Skin, blood, and nerve tissue can be damaged the longer an animal is in a trap or snare. Another important factor is ambient temperature. When temperatures are below freezing, traps and snares are more likely to cause severe and irreparable harm to skin, bone, and vascular and nerve tissue at and below the constriction caused by a trap or snare. Upon release, the loss of function in an animal’s extremities will limit their ability to hunt, travel, and escape predation (such as the ability to climb a tree). An animal could also simply freeze to death. For these reasons, in his experience, researchers work hard to

limit the time a bird or animal is restrained in a trap; researchers use frequent trap/snare checks or electronic monitors to minimize injury (Niemeyer Expert Disclosure, p.13).

Animals caught in freezing weather have cold transferred into the foot by metal traps. Constriction injuries cut blood flow into the foot, and the feet will freeze very quickly. Freezing feet is an irreparable injury (Niemeyer, Expert Disclosure, p. 13).

Mr. Niemeyer stated that "Trapping is not selective. My fifty years of experience in the field informs this knowledge. Traps catch whichever animal happens to step in the trap with enough weight to depress the pan and spring the trap" (Expert Disclosure, p. 17).

Mr. Niemeyer testified that best practices dictate that traps should be checked at least every 24 hours to minimize injuries and mortality to grizzly bears. A trapped grizzly must be released within 24 hours or there is a risk of irreparable harm and injury from prolonged restraint, constriction, stress and dehydration leading to death. He testified that Best Management Practices are not being followed when trap check periods exceed 24 hours. "Trappers should be required to check their traps at least once per day, every day." (Expert Disclosure, p. 18).

Dr. Gilbert Proulx

One of the most renowned professional wildlife biologists and trap researchers in Canada, with more than 40 years of field experience, Dr. Gilbert Proulx has argued that traps and snares should be checked every 24 hours and kill traps and snares every 12 hours.

Dr. Proulx writes, "The concept of humane trapping involves more than just developing devices that meet standards. It also entails changes on how trappers carry out their activities. Shortening trap check times and using only trapping devices that can consistently and humanely kill animals, would significantly minimize injuries, pain and suffering for trapped animals."¹⁵

When trap lines are too long, Dr. Proulx recommends subdividing them into smaller sections so that they can be checked every 24 hours, e.g., at sunrise, or even more often.

Proulx reports on the capture of a coyote, who was caught in a kill neck snare and struggled for roughly 15 hours.

He describes the incomprehensible cruelty involved in the use of snares: trail cameras hidden near two snares set according to the standard outlined by the industry. The coyote was caught in the snare at 11:51 am. For the next 14 hours, 16 minutes and 14 seconds, the animal is conscious and violently struggling against the snare that tightens the more the coyote struggles.

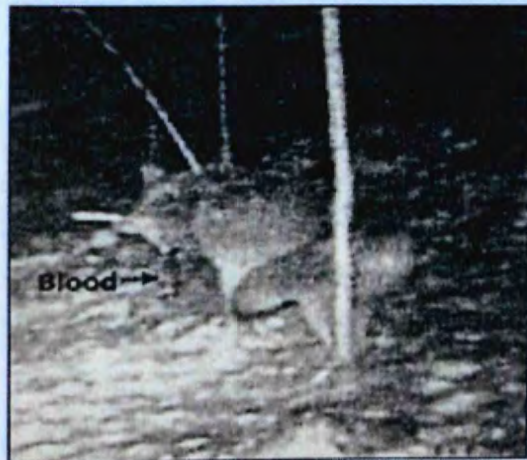
Proulx writes,

“Struggling was intense and frequent at the beginning of the capture period and consisted of strong jumps, twists, falls, and attempts to bite the snare cable.” The coyote struggled until the end. It eventually collapsed, and it lost consciousness 18 minutes later. I estimated time of death at 20:31:05, i.e., 23 minutes 51 seconds after irreversible loss of consciousness.

At time of death, the position of the animal suggested a quick and humane kill. However, the neck snare did not quickly render the coyote and the irreversibly unconscious. It was not a humane kill, based on existing humane criteria.” Gilbert writes that the second trapped animal observed, a wolf, did not fare any better., and concluded that **both animals were tortured before death occurred.**¹⁶



After 3 hours of capture, the animal paced, pulled on the cable, and kept it taut. The snare cable was embedded in its neck, and the animal was still bleeding from the mouth (Photos: Gilbert Proulx©).



After 6 hours, 49 minutes of capture, the animal bled profusely from the mouth (Photo: Gilbert Proulx©).



After being captured for 11 hours, 30 minutes, the coyote continued to pull violently on the snare cable (Photo: Gilbert Proulx©).



After 13 hours, 53 minutes of capture with repeated escape attempts, the animal was weak and shaking, and stood up with difficulty (Photo: Gilbert Proulx©).

The wolf

The wolf was captured early at night, at 03:21. Irreversible loss of consciousness occurred at 07:00 the same day, i.e., 3 hours, 39 minutes later, and was closely followed by death. During this time period, the camera recorded 83 individual 20-second-long videos during which 21.7 minutes of behavioural activities were recorded; during nearly 6 minutes of recording, the animal was outside the camera frame.

The 21.7 minutes of recorded observations consisted of 10.8 minutes (49.8%) of struggling, 10.7 (49.3%) minutes of resting, and 0.2 minutes (0.9%) of chewing on a stick. Struggling was intense and frequent at the beginning of the capture period, but became less frequent and of shorter duration with time.



After 2 hours of capture, the wolf was still struggling to escape. He chewed on the wire and executed a series of dives and somersaults (Photos: Gilbert Proulx ©).

At capture time, for the first 20 seconds, the wolf jumped, rolled on the ground, and twisted its head to reach and chew on the snare cable.

8. Field Professionals Support 24-hour Trap Check

- **Hunter-Ed.com** states: “You must check your traps at least once a day. When you set traps, you make a commitment to check them every day until the traps are removed. This commitment does not change because of bad weather or other inconveniences. You should also check traps early each day to: Release non-target animals as soon as possible.”¹⁷
- **The American Society of Mammalogists** state that, “The number of traps set at a particular time and location should not exceed the ability of the investigator to monitor them at reasonable intervals,” and that “[S]nares or spring foothold traps must be checked frequently (perhaps twice daily or more often depending upon target species and potential for capture of nontarget species).”¹⁸
- The **American Veterinary Medical Association (AVMA)** recommends that “... traps be checked at least once every 24 hours, and that trap alarms are used” (AVMA, Policy).¹⁹
- The **Association of Fish and Wildlife Agencies (AFWA)/Trapper Education Manual** urges trappers to check their traps at least daily. “Make a commitment to check your traps at least once every day...” “trappers must check their sets every day ...” “Regardless of the law, responsible trappers will visit their traps daily. It is good for animal welfare, and it will increase your success,”²⁰ meaning, a 24-hour trap check is necessary in order to reduce suffering, more quickly release non-target animals, and actually improve success by, for example, reducing the chance of predation on an animal caught in a trap.

The AFWA used daily trap checks to develop its Best Management Practices (“BMPs”) for trapping in the U.S.²¹ National Trappers Association recognizes the significance of AFWA consisting of “Experts from all 50 state fish and wildlife agencies and other conservation groups ...”²² FWP promotes these BMPs on its website.²³

9. FWP recommends a mandatory trap-check interval

In 2017, FWP itself states:

“[The agency] 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.”²⁴

10. Scientific evidence supports a mandatory 24 trap-check:

Scientific consensus confirms that traps and snares are not selective, and supports a mandatory 24-trap check, with some professional and most experienced wildlife and trap researchers recommending a 12-hour mandatory trap check, e.g., Proulx 2019. Numerous scientific studies support a 24-hour trap inspection as it would help reduce the severity of injuries inflicted on captured animals.²⁵ These studies conclude that the longer an animal

spends alive in a trap, the more severe her/his injuries can become, and the lower the likelihood that “nontarget” animals will be able to be released alive. Requiring a 24-hour trap check for all trapped animals would help FWP gauge population trends of species as well as reduce unnecessary suffering.

11. Montana has Adjusted Regulations for Best Management Practices in the Past.

Montana requires trapper education (MCA 87-2-127) and has incorporated Best Management Practices into many aspects of trapping. The state has also adopted equipment restrictions and has implemented additional protections for species such as Canada lynx and grizzly bears including limiting the trapping season and a 24-hour trap check requirements for trapping of wolves, and for bobcats within LPZs. Other restrictions include prohibition on the use of snares within LPZs; the requirement to report non-target capture of any animal that cannot be lawfully trapped or snared; capture of domestic dogs; and other provisions including requiring breakaway devices for snares, and limits on size and types of traps. The FWP Commission can also mandate a uniform 24-hour trap check, which would establish equal value for wolves, grizzlies, eagles, owls, wolverines and other critical and ESA-protected species. A mandatory 24-hour trap check would likely reduce “wanton waste.”

12. Trapping and Snaring Offenses (MCA-87-6-601) are Enforceable.

These include waste of furbearers by failure to attend traps (MCA 87-6-603). The addition of a 24-hour trap check assists responsible wildlife management.

ADOPTION:

Pursuant to its rulemaking authority under § 87-1-301, Montana Code Annotated, the Montana Fish and Wildlife Commission has the authority to initiate formal rulemaking establishing a mandatory physical trap-check interval of 24-hours.

The rule as proposed to be adopted would provide as follows:

All persons setting traps and snares shall physically check every trap and snare set on public lands in Montana at least once every 24 hours, regardless of the species pursued.

The department shall make rules to implement this section.

A person who violates this section shall be subject to a written warning or a fine of not less than \$50. A second offense shall be subject to a fine not less than \$100. In addition, at the discretion of the game warden, the person may be subject to forfeiture of any trapping (and any hunting and fishing license) licenses issued by this state for 12 months from the date of the violation.

Persons known to petitioners to have an interest in the proposed agency action are conservation organizations, supporters of wildlife, individual trappers, the Montana Trappers Association, land and wildlife management agencies.

Petitioners request a hearing or oral presentation for expression of petitioner's and other interested person's or organization's views.

WHEREFORE, petitioners request the Department of Fish, Wildlife & Parks and the Fish & Wildlife Commission to initiate rulemaking proceedings in accordance with MAPA, and to adopt the proposed rule set forth in this petition. In accordance with 1.3.308 RULEMAKING, PETITION TO ADOPT, AMEND OR REPEAL RULE, section 3(b) the Department and Commission shall, within 60 days after the date of the submission, either: (i) issue an order denying the petition; or (ii) initiate rulemaking proceedings and must: (a) be in writing; (b) be based on record evidence, including any information submitted by the petitioner, the agency, and interested persons; and (c) include the reasons for the decisions.

On behalf of Footloose Montana and the Gallatin Wildlife Association:

Anja Heister

Anja Heister

[July 27, 2026].

References

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² Strong, Zach and NRDC (2018). Letter/petition to FWP in support of a mandatory 24-hour trap check and resources provided to the Montana Trapping Advisory Committee. https://fwp.mt.gov/binaries/content/assets/fwp/aboutfwp/councils--committees/trapping-advisory-committee/tac_binder_digital_short.pdf?utm_source=chatgpt.com

³ FWP Montana Trapping Advisory Committee (TAC) 2018, p. 6.

⁴ "A 1990 New York State Department of Agriculture study examined the effectiveness and selectivity of coyote depredation control techniques and found that 10.8 non-target animals were trapped for every coyote captured ... Dick Randall, a former government-employed trapper, testified before Congress in 1975 that for every target animal trapped, at least two non-target animals are trapped" (Animal Protection Institute. CULL of the WILD: CONTEMPORARY ANALYSIS of WILDLIFE TRAPPING in the UNITED STATES, 2004, p. 32: https://projectcoyote.org/wp-content/uploads/2015/05/Book-Cull-of-the-Wild.pdf?utm_source=chatgpt.com

⁵ See 2018 NRDC letter, p. 2: https://fwp.mt.gov/binaries/content/assets/fwp/aboutfwp/councils--committees/trapping-advisory-committee/tac_binder_digital_short.pdf

- ⁶ Those species with an asterisk (*) following their name are currently designated as “species of concern” in Montana. From records provided by Montana Fish, Wildlife & Parks, it is not clear which raptors were captured; multiple raptor species are designated as species of concern in the state.
- ⁷ Inman R. 2018. Incidental Captures of Wildlife and Domestic Dogs in Montana, 2012-2017. Montana Fish, Wildlife & Parks. 6p.
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- ⁸ Kluge N. 2025. Furbearer Program Statewide Harvest & Management Report. 2024-2025. Montana Fish, Wildlife & Parks. 64p. <https://fwp.mt.gov/binaries/content/assets/fwps/hunt/trapping/2025-report/2025-furbearer-program-annual-report.pdf>
- ⁹ Servheen Chris, MWF letter to the FWP Commission, 2024:
https://fwp.mt.gov/binaries/content/assets/fwps/commission/2024/oct/wildlife/public-comment/mwf_trapping-setback-comment-november-2024.pdf
- ¹⁰ Kareiva P. et al. (2022). A new era of wolf management demands better data and a more inclusive process. *Conservation Science and Practice*. 2022;e12821. 9p:
<https://onlinelibrary.wiley.com/doi/epdf/10.1111/csp2.12821>
- ¹¹ FWP hunting/trapping, quota supporting information, 2019.
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- ¹² Fox and Papouchis. 20024. Cull of the Wild, pg 32.
<https://www.psychologytoday.com/us/contributors/judith-orloff-md>
- ¹³ AWI Quarterly, 2007: The Truth behind Trapping:
https://media.wix.com/ugd/5073cd_20202f1effcd48feab7fae0c44d424bf.pdf
- ¹⁴ Ibid.
- ¹⁵ Proulx, G. and Dwight Rodka. (2019). "Killing Traps and Snares in North America: The Need for Stricter Checking Time Periods." *Animals* 9(9):570.
<https://pmc.ncbi.nlm.nih.gov/articles/PMC6719131/>
- ¹⁶ Proulx, Gilbert. 2016. *Intolerable Cruelty: The Truth behind killing neck snares and strychnine*, pgs. 13-16.
- ¹⁷ Hunter-ed, is produced by Kalkomey Enterprises, LLC, an official state-delegated provider that provides hunting education courses and certification and publishing hunting safety education materials: https://www.hunter-ed.com/nationaltrapper/studyGuide/Daily-Trap-Checks-Are-Essential/221099_87952/
- ¹⁸ Sikes, RS, and WL Gannon (2011). Guidelines of the American Society of Mammalogists for the use of wild mammals in research. *Journal of Mammalogy*, 92(1):235–253, 2011, p. 242:
<http://www.mammalsociety.org/uploads/Sikes%20et%20al%202011.pdf>
- ¹⁹ American Veterinary Medical Association (AVMA), Policy Statement/Leghold traps:
<https://www.avma.org/resources-tools/avma-policies/trapping-and-steel-jawed-leghold-traps>
- ²⁰ Association of Fish and Wildlife Agencies, Trapper Education Manual (2005), p.97:
https://www.fishwildlife.org/application/files/7915/1977/4541/Student_manual_2005.pdf
- ²¹ AFWA, Best Management Practices in the United States, 2006, p. 4.
https://www.fishwildlife.org/application/files/4716/3846/4836/Introduction_BMP_2021.pdf
- ²² National Trappers Association (NTA): <https://nationaltrappers.com/bmp.html>
- ²³ Montana FWP/ Best Management Practices: <https://fwp.mt.gov/hunt/trapping>
- ²⁴ FWP's response to public comments on Trapping Proposal 2017.
- ²⁵ Studies include: Andelt, W. F., R. L. Phillips, R. H. Schmidt, and R. B. Gill. 1999. Trapping furbearers: an overview of the biological and social issues surrounding a public policy controversy. *Wildlife Society Bulletin* 27(1):53-64; Butterworth, A. (2017). Marine mammal welfare: Human induced change in the marine environment and its impacts on marine mammal welfare. Cham, Switzerland: Springer, p. 553; Cattet, M., J. Boulanger, G. Stenhouse, R. A. Powell, and M. J. Renolds-Hogland, An Evaluation of Long-term Capture Effects in Ursids: Implication for Wildlife Welfare and Research, *Journal of Mammalogy*, 89(4):973-990 (2008); Halstead, T. D., K. S. Gruver,

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