

Trapping Best Management Practices Working Group Meeting Minutes (Fourth Meeting)

Tuesday, September 27, 2022

The Trapping Best Management Practices (BMPs) Working Group held a meeting beginning at 5:00 pm on Tuesday, September 27, at the Agency of Natural Resources Annex Building at 190 Junction Road in Berlin.

Members Present: Joanne Bourbeau, Chris Bradley, Senator Christopher Bray, Tom Decker, Brenna Galdenzi, Kevin Lawrence, Bruce Martin, Robert Mullen, Martin Van Buren, Game Warden Michael Scott

Members Present Remotely: Game Warden Lt. Sean Fowler

Absent: Representative Amy Sheldon, Michael Kolsun

Fish and Wildlife Department Staff Present: Director of Wildlife Mark Scott, General Counsel Catherine Gjessing, Working Group Leader Kim Royar, Wildlife Management Program Manager David Sausville, Specialist Chris Saunders, Public Information Officer Joshua Morse, Hunter Education Specialist Nathan LaFont

Fish and Wildlife Department Staff Present Remotely: Wildlife Veterinarian Dr. Walt Cotrell

Agenda Items

- A. 5:00-6:15 Introduction and Presentations
 - 5:00 - 5:10 Opening remarks
 - 5:10 - 5:15 Review of the September 8th minutes
 - 5:15 - 5:35 Trapper Education in Vermont
 - 5:35 - 5:45 Trapper Education Q & A
 - 5:45 - 6:00 VTA presentation
 - 6:00 - 6:15 Dinner

- B. 6:15 - 8:15 Discussions on the remaining 4 consensus points
 - 6:15 - 6:45 Exposed bait
 - 6:45 - 7:15 Killing traps on land
 - 7:15 - 8:00 Setbacks on public trails
 - 8:00 - 8:05 Break
 - 8:05 - 8:15 VTA petition

- C. 8:15-8:30 Closing/points of consensus/next steps

The meeting was called to order at 5:06 pm

AGENDA ITEM A

Royar welcomed participants to the final meeting of the Trapping BMPs Working Group and stated her hope for a productive night. She introduced Hunter Education Program Coordinator Nicole Meier to speak on the department's trapper education program per the legislation's mandate to address this topic.

Meier stated her intention to provide a high-level overview of the department's program, covering the following topics: national, international, and VT standards trapper education standards; how standards are established; core curriculum; who Vermont's trapper education instructors are; who Vermont's trapper education students are; and what happens after trapper education is completed. Her presentation included the following:

- Trapper education standards are established by two international bodies: the International Hunter Ed Association (IHEA) and the Association of Fish and Wildlife Agencies (AFWA). AFWA puts together course materials nationally. AFWA standards are created by biologists, educators, NGOs and volunteers. Standards are reviewed by IHEA and were ratified at a 2020/2021 conference by that organization.
- The IHEA core curriculum stresses safe, legal, responsible trapping. Wildlife ecology and management, personal responsibility, safe trap handling/field practices, wildlife ID, and trapper best management practices. It also emphasizes participation, community support, and membership.
- AFWA standards are written by biologists and environmental educators, in line with the national Project WILD curriculum for K-12. The AFWA trapper education course is publicly available. The core curriculum focuses on preparation, in the field trapping, techniques, and fur, with a focus on safety, legality, and responsibility.
- Vermont Standards: safety, legality, and ethics are the three guiding principles for hunter and trapper ed at the state level. Students must complete the AFWA online course or a comparable experience as homework prior to a 6-8 hour course with VFWD. This is because VFWD believes in person education is essential for trappers. Students must display safety, responsibility, and maturity, and pass a final exam with a 78% or better. VFWD ensures standards are met within our classes by evaluating our courses internally. Instructors peer-review each other's courses with a rubric, staff members also evaluate volunteer instructor courses, and student evaluations survey completed at the end of each class. Peer-review was relaxed during covid.
- Volunteer instructors teach the courses, sometimes with game warden support. VT has 17 active, certified volunteer instructors. In 2022, 11 trapper education courses were taught. Five of these were through Green Mountain Conservation Camp's advanced week.
- Trapper education instructors are certified through a lengthy process: application to VFWD, background check, interview with law enforcement, a full day in person training with hunter education program staff, and a full day in person apprentice teaching experience. This usually takes a year to complete. Instructors must also do continuing education as a VFWD professional development course every other year and teach a

course every year to remain in the program. This ensures instructors are up to date with the department and regulations. VFWD sends out regular communications.

- Trapper education courses are open to everyone. In 2022, a total of 123 students graduated, a plurality were between 11-15, mostly kids with family at courses and kids at GMCC; next largest chunk between 16-20. Of the 123 students 77% were male identifying, 23% female identifying, none were nonbinary identifying; 59 students passed the course at GMCC. 64 students passed the course outside of camps.
- Once trapper education is complete, students are eligible to trap in Vermont. Meier stressed that the end of the course is not the end of a trapper's education process. They still need to stay up to speed on laws and regulations, remain active in the community, and seek mentorship as needed.

Bourbeau asked Meier about nuisance wildlife control operators (NWCOS): does VFWD provide any instruction on humane exclusion devices (one-way doors, etc) as alternatives to [lethal] traps. Meier clarified that NWCOS need to take Vermont trapper education, and that the class's main focus is safety, responsibility, and legality. Royar added that a manual is being developed by the department to address NWCO protocols. Bourbeau stated that there is at least one NWCO in Vermont and she would like to see alternatives to lethal methods mentioned in the [VFWD trapper education] course. Meier clarified that [nonlethal] alternatives are also detailed in the online section.

Galdenzi asked whether there is any testing or renewal process after trappers pass the course. Meier explained that there is not a testing/recertification for hunter or trapper education, similar to how there is no continuing testing/recertification for driver education. Meier explained that VFWD sends trapper/furbearer newsletter to all licensed trappers to help them remain up to date. Lawrence added that it is common for trappers to retake the course to reup their skills. Warden Scott added that there is a yearly trappers gathering, and mentioned the advanced trapper's education course.

Galdenzi asked whether a trapper who received their license out of state has reciprocity in Vermont or in other states. Meier explained that it is at the discretion of the commissioner. In general, Meier clarified that VFWD would accept reciprocity but that there are some cases that might require commissioner approval. Mullen shared that his fishing license in Alaska also came with a hunting/trapping license, and asked whether this would make him eligible to trap in VT. Meier explains that because to purchase a VT license you must show proof of having taken trapper ed, Mullen's Alaska example might be a case of commissioner approval in VT.

Bray asked how many licensed trappers are in Vermont. Royar answered that there are about 500 active trappers currently and that license numbers vary and have had a recent high of 3000. Not all license holders are active trappers.

Galdenzi asked if the May 2022 wanton waste law has been communicated in the trapper education and hunter education curricula because she has not seen it on VFWD's social media or on the department website. Meier explained that trapper and hunter education instructors receive a guide on new laws and new laws are mentioned in the laws and ethics section of the curriculum. Mark Scott added that the new laws will be in the 2023 hunting and trapping

lawbook. Morse added that these were shared on VFWD's website and in an email blast to license holders. Galdenzi stated that social media is a free and effective platform and not publicizing the new laws there is a missed opportunity [for the department]. Royar added this [the efficacy of social media as an outreach tool] may not be true for the trapping community.

Bray asked whether humane dispatch is mentioned in trapper education. Meier clarified that humane dispatch is taught: the quickest and cleanest way is often a .22 shot, but circumstances may require other methods. The standard for selecting this is based on safety to the trapper, other hunters, the public, and the animal.

Decker asked how many non-resident trappers are in the state; Royar clarified that the trapping population is mostly resident.

Bourbeau asked if the information [summarized in Meier's presentation] is available online, Meier confirmed that the AFWA manual is available on the AFWA website and that this is the manual that the department uses. Meier added that the department can also make these materials available. Galdenzi asked how the topic of methods of killing trapped animals is discussed in the manual/the curricula that trapper education instructors would use. Meier says this is left up to the instructors to determine in their courses and that AFWA/IHEA prescribe the topics.

Royar then shifted to the next item on the agenda and reminded the group that if they have not yet reviewed the minutes from 9-8 to please do so and send any comments to Morse by EOD Friday.

Martin asked Morse to check what the original HSUS/POW recommendation for body gripping traps at the last meeting was in the 9-8 minutes. Royar, Bourbeau, Galdenzi reviewed what is currently on the easel for this topic. For body gripping traps, the easel read: "body gripping traps fully submerged, none on land or partially submerged, [and to] prohibit the drowning of animals in body gripping traps."

Galdenzi asked how trapper educators teach best practices for killing animals that are caught in drowning traps but resurface. Decker clarified that this depends on trap type. Galdenzi returned to partially submerged body gripping kill traps, and expressed concern that partially submerged kill traps may catch some animals but not kill them.

Morse asked whether the easel accurately reflected HSUS/POW's position on body gripping kill traps from 9-8 per Martin's question. Bourbeau confirmed that it does. Martin confirmed that his question is answered.

Royar then shifted to the next agenda item and handed out the VTA position statement [that was solicited in the homework for the 9-8 meeting] and handed out copies of the HSUS/POW/VWC position statement covered in the 9-8 meeting as well. She gave the group a chance to review these prior to inviting Martin to present on the VTA points per the 9-8 meeting agenda.

Martin summarized the following positions from the VTA, which are further detailed in their position document submitted for the 9-27 working group meeting:

- Setbacks: No trap set within 10 ft from a trail, except under bridges and waterways. He stated there is no data showing risk to the public near parks, etc
- Bait: meat-based baits should be covered at the time a trap is set
- Body gripping traps: no meat-based baited body gripping traps shall be set on the ground
- Cable restraints: VTA recommends cable restraints be allowed in the state of Vermont with prior VFWD certification for users
- Recommendation to increase the number of game wardens
- Recommendation that the trapper education curriculum include any new regulations

Royar shifted the group to a dinner break, and asked participants to consider each proposal and to take the dinner window to ask questions of each other. She prefaced the next portion of the meeting with an invitation for us to focus on finding areas of alignment between the two proposals: “the goal is to find some places where we overlap.”

The group broke for dinner at 5:53 pm

AGENDA ITEM B

The group resumed at 6:18 pm.

Royar stated that she can see areas of alignment in these two position papers [submitted by the HSUS/POW/VWC and VTA participants). She asked the group to identify areas where there is agreement, starting with covered bait:

- Bourbeau asked how water would be a covering for bait. Lawrence clarified that some folks use fish as bait, and water would cover bait in an underwater trap.
- Galdenzi stated [HSUS/POW/VWC] will need time to talk with their boards based on the VTA position document. She expressed that Maine considers many things bait and the VTA position document just says meat-based baits.

Royar again asked the group to look for areas of alignment. Morse reminded the group that this is a two-way street and asked the VTA and other trapping constituents to look for areas of alignment in the position document from HSUS/POW/VWC.

- Lawrence identified that meat-based bait being covered is a point of agreement. Royar asks if [meat-based] covered bait is something we can all see as a point of agreement. No dissent is voiced.
- Bray asked whether [any list of areas of agreement generated in the current discussion] will be treated as the working group’s recommendation from the commissioner to the legislature, or simply a list of areas of agreement. Royar explained that this list of aligned topics will not be the full recommendation from the commissioner to the legislature; that the dept and commissioner are looking for agreement between the two groups and will want to build on that in crafting a final recommendation.
- Galdenzi stated that she believes that meat should be covered, but so should all other animal derived products [used to bait traps]. Royar stated that this is clear from HSUS’s proposal and reiterated that the current task is to look for points of agreement between the two position documents. Bourbeau confirmed that covered meat-based bait is a lowest

common denominator, but also the only thing [HSUS] can agree with [from the VTA covered bait position].

Morse encouraged the VTA/trapping constituency representatives and HSUS/POW/VWC participants to ask questions of each other and identify other possible areas of agreement, while recognizing that the working group participants are not in a place to commit to updates to the language in their position papers.

- Mullen and Royar developed a question for VTA/trapping constituency: why did they not recommend baits be covered and invisible from the air? Lawrence explained that covered bait that are visible but covered under mesh would exclude raptors. He stated that you can make an exclusion around a set that would prevent access for non-target animals.
- Galdenzi asked the trappers in the room to consider that other states have recommendations in place to reduce incidental take of species like raptors (e.g. Maine). She asked whether the trappers have reached out to colleagues in those states, mentioning that USFWS is [likely] going to increase regulation on this: “have you talked to anybody in Maine”. Lawrence explained he had been on the trap line in Maine for pine marten, and that a cage cover with visible but inaccessible-to-raptors bait was legal in that state. Galdenzi re-read Maine’s requirements, and stated that VT has no such measures in place. Lawrence stated that traps off the ground are required in some cases; the two further discussed. Martin clarified that the VTA petition would cover all meat-based baits on the ground. Galdenzi expressed concern that non-meat based baits would not be protected.

Royar brought the discussion to a close, stating that when the working group participants cannot find consensus it will become the department’s responsibility to craft the final recommendation for the commissioner and legislature to review.

Royar then transitioned the group to the next point: killing traps on land. She read the HSUS position and VTA position and asked the group to consider areas of alignment.

- Galdenzi brought up the case of a black bear caught in a body gripping kill trap last year, to support the HSUS/POW/VWC recommendation not to have any such traps on the ground. Lawrence asked for data on bear capture in body gripping kill traps. Decker confirmed this is an anomaly and the VT case last year is one of the very few cases he has heard of in years; in contrast he has heard of three bears getting their heads caught in milk jugs in the past year.
- Galdenzi mentioned that with climate change bears may be out on the landscape more during body gripping kill trap season. She asked the group to look at the animals currently being caught in these traps, and whether other kinds of traps could allow for the same harvests. She stated the benefit of body gripping kill traps do not justify all of the potential suffering coming from these traps. She stated that she is not asking trappers not to trap anymore, just that she is asking that kill traps be restricted to underwater.

Royar redirected the conversation, stating that we understand this distinction between the proposals and that this is either this the place the working group will need to end the discussion or can there be discussion of areas of commonality around the two positions on kill traps.

- Galdenzi asked about non-meat baits on kill traps that could be set on the ground. Lawrence explained why other kinds of lures (scent, etc) on the ground make sense. He stated that removing body gripping kill traps from land is a non-starter for the VTA.

Royar concluded this is a divisiveness point and stated that the group will move on to the next topic: trap setbacks on public lands.

- Martin reminded the group of the VTA's 75 foot starting point stating that this had since been reduced, referencing the 0 ft offset mentioned previously. Royar asked if there is potential to negotiate.
- Morse noted that the conversation is becoming more heated and suggested a break to refocus on common ground; Bradley and Bourbeau state this is not needed, the group proceeded.
- Royar asked whether there is willingness [in the group] for a conversation bringing the two different positions on trail setbacks closer together, acknowledging that the group is presented with two very distant positions at this time.
- Galdenzi asked the group to look at the legislative mandate beyond state land excluding WMAs: "any other public locations where persons may be reasonably expected to recreate." Galdenzi suggested the group is far from [considering the full mandate] and stuck on where these trap setbacks are going to happen. She reiterated that the legislative mandate covers more than state lands. Galdenzi stated [this larger scope] is what [POW's members and coalition members] thought the working group was considering per Act 159, and that she will need to go back to her board to discuss further.

Royar asked Gjessing to present on trail definitions.

- As Gjessing prepared, Bradley brought up state parks as a place where people can be expected to recreate. He noted the regulations on pets in day use areas in state parks is based on a 10 ft leash law or safe confinement of pets on FPR lands. He reiterated [his understanding] of the issue [before the working group] as pets, not people, getting caught in traps.
- Bourbeau asked whether Lawrence is suggesting nobody ever strays off the path, and whether a 10 ft rule would accommodate that. She stated that 10 ft might not cover a scenario of people stepping off the path to examine a flower, let another person pass, etc. Lawrence reiterated his suggestion from a prior meeting that "based on 19 VSA 702 the right of way for each highway/trail will be 3 rods wide... 24.75 ft... If we were to comport to statute [based on the] minimum right of way [it would be 24.75 ft from the middle of the trail outward]... this would easily handle the 10 ft exception."
- Mullen stated that in State Parks, Lawrence's point makes sense, but outside of State Parks where no leash law is required, this suggestion is less adequate. He stated that a 10 ft setback is inadequate and that VWC is willing to discuss a 500 ft setback. He described that VWC put up the 30-yard setback in the Bolton town forest, and this has worked well. Martin countered that the group is discussing state land; town and municipal land is private and that trappers need to get permission to trap there which overrides the need for a setback. Mullen countered that federal land should also be discussed. He pointed out that state land is a very minimal amount of land covered by the long trail for example. Lawrence asked whether trappers on operating on the Long Trail; Mullen replied that if

no one is trapping there and setbacks are a good idea generally, then there should be no objection [to a setback there].

Royar asked Gjessing to provide a definition of a public trail. Gjessing stated she is not prepared to provide a definition for Vermont. She explained that some states have definitions focused on facilitating recreation. Gjessing stated the best definitions are those that help define trails where a map or organization has not already identified them. She stated that depending on the direction this conversation goes (e.g. to cover federal land, trails on private land, etc), she would need to check with other organizations to learn if their trail systems are designated. She stated that the language in the statute—“other public locations where persons may reasonably be expected to recreate”—talks about public trails but does not define them.

- Bray stated: “There is an agreement to have setbacks”, and “there is an agreement to better define the scope of the application of any rule” and “we need to better define the definitions that trigger this—for instance, what precisely from a legal point of view does ‘other public locations where persons may be reasonably expected to recreate’ mean?” He stated that “everyone is agreeing that we need to do more, and this can help us decide what the ‘more’ we need to address is.”

Gjessing asked the group to talk about why certain distances would be justified (for instance, Bradley’s 25-foot recommendation).

- Galdenzi stated she brought this topic to the board in 2009, requesting 150 ft setbacks from public trails, 500 ft from trailheads, and 1000 ft from campgrounds on public land. She stated conference calls with leaders in other states informed her and her board to select these distances. Royar and Warden Scott asked what these setbacks are trying to accomplish. Galdenzi stated they would be trying to prevent events like a dog on a trail sniffing out a deer leg [used to bait a trap] and getting trapped.
- Royar then asked about the origin of the current 500 ft setback being proposed by HSUS/POW/VWC. Galdenzi stated that if the regulation applies to all public lands, these groups suggest a single setback that would be easier to enforce. Bourbeau added that the 1000 from campgrounds went down to 500, the 150 went up to 500 in response to Act 159. Galdenzi stated that VTA’s recommendation of 10 ft is much less than [the setbacks in place in] other states.

Royar reiterated that Senator Bray gave a sense of where we need to go from here, and it may be up to the department/commissioner to do research on final distances.

Lawrence stated that [the BMP study drew on] 1 million trap nights of data/30,000 trap nights of data in Vermont, and that trappers without guidance on setbacks did not create problems. He stated that “this is a solution in search of a problem,” and reiterated that he believes the legislative intent is to identify safe distance [for trap setbacks from trails] and that the group has done so.

Mullen asked to go to the underlying data of 30,000 trap nights and pointed out that since dogs would not be reported prior to 2018 there is a data gap. He noted that [trapper] Bruce Barrario is quoted in Seven Days as saying he catches dogs all the time, and suggested a possible under-reporting of these incidents. He suggested that [capture of dogs] does happen, and that it may not

be as rare as “we would like to believe it is,” and concluded that the [BMP study] data is based on possibly spotty reporting.

Lawrence asked Decker if the AFWA BMP study data is solid. Decker stated that it is, and that the AFWA data shows that dogs are caught 1.5% of the time in this dataset and that no dogs caught during the study required veterinary treatment. Royar agreed that Mullen is right dogs get caught occasionally.

Martin returned to Act 159, stating that the recommendations be based on research conducted by scientists. Martin stated that the data and research suggests a recommendation of “no change” could be viable.

Galdenzi agreed with Mullen, and stated she wishes we would not refer to dogs/cats not getting caught in traps. She reiterated the 2018 reporting threshold and noted that even prior records show that dogs and cats have been caught in traps. She stated that diminishing the reality that is has happened and will happen again in the future does not sit well.

Galdenzi stated she is not focused on what happened during the BMP study fieldwork. Decker/Royar clarified that AFWA data was collected in VT; Galdenzi stated that her organization has concerns about the data collection process used in that study, and also stated that there is a public concern evidenced by annual calls she receives asking for places to hike without the risk of encountering traps.

Galdenzi acknowledged that the working group may need to let the commissioner make the decision given the disparate positions under consideration.

Fowler agreed that there was no reporting of trapped dogs/cats prior to 2018. Fowler asked whether we have data on whether trapped dogs were on leash or off and noted that unleashed dogs are a danger to wildlife.

Decker stated he is concerned with some definitions of public lands and trails. Decker drew an example with a town line and a private landowner, adjacent to a school’s parcel. He explained that the two towns debated whether a trail on the school land along the private boundary would affect the private owner’s ability to trap on their land. He made the point that there will be significant complexity [for trappers] based on what is decided.

Warden Scott noted that law enforcement uses reasonable actors as a litmus in many decisions, and that reasonable actors are aware of and responsible for the risks of their own decisions. He stated that whatever decision the commissioner comes to will need to be based on reasonability. He added that law enforcement can assure people reasonable safety in public places close to trails, but cannot guarantee safety beyond reasonable distances in public places. He stated when people take a dog off leash they are increasing their risk, and it is not the job of the state to assure peoples’ safety in all places against all degrees of privately assumed risks.

Bray returned to the question “what is the definition of a trail,” and asked the group to consider “other public locations” and asked “Can the state law [override] a private landowner’s decision

making about trapping?” Bray stated [the legislature is] asking [the working group] to anticipate the decisions the commissioner will have to navigate [in making its recommendations].

Gjessing noted that federal law trumps state law which trumps municipal law. Gjessing noted that some municipal lands have trapping permitted, and these have been challenged and upheld. Gjessing stated a law that covers trails could apply to municipal lands if that was what was decided. Bray followed up with a question to Warden Scott about whether the warden service receives calls to enforce regulations on both private and public land; Warden Scott confirms this is the case.

Warden Fowler responded to Galdenzi’s request for information about of where people can walk without worrying about trapping, with the offer of a training to show [POW’s membership] how to release a dog caught in a trap.

Galdenzi stated her appreciation, and that she has a 100 lbs pit bull cross whose paws she cannot touch, thus that she would not be able to help her dog in this situation [even with such a training]. She stated it would be good for people to know, and will likely take Warden Fowler up on his offer, but noted that she does not want this situation [dogs being caught in traps] to happen in the first place. She stated agreement with Warden Scott on publicly assumed risk but also stated that 10 ft off the trail is “nowhere close to where we need to be.”

Mullen asked about the hierarchy of setback laws: if [Vermont] passed a setback law, would it be shot up the line to the National Forest/Federal land? Gjessing stated she believes it would – depending on if there are federal laws that would preempt it. She confirms that if it did not conflict with federal law, then it would: “people who hunt on federal land in VT have to follow VT regulations, but also specific federal regulations.”

Decker stated he would be willing to help with Fowler’s proposal to teach trap removal. Royar asked to highlight this recommendation in the minutes.

Bourbeau asked whether the VTA has had any discussion around federal lands; Lawrence stated that [the discussion at the VTA] was about state lands since that is what was brought to members.

Galdenzi stated that she and Bourbeau approached Royar and Morse after the last meeting to say they did not agree to limit the working group’s recommendation to state lands only. Bourbeau added that they saw [a setback on state lands] as low hanging fruit but want setbacks on all lands.

Mullen agreed with Warden Scott’s point about private responsibility. He stated that Vermont does not have a leash law, but does have a free running law under which dogs must be under voice control. He stated that one can be cited if dogs are not under control, and this is mimicked in most town ordinances. Mullen asked the group to agree on the point of removing dogs from a trap – a seminar on that is not the solution he sees the working group as dedicated to reaching, but as an independent idea it is a very good one we can all get behind.

Royar asked if there is more to discuss here, or if the dept/commissioner should go forward to make a rec.

Mullen asked whether the working group looked at AllTrails for trail definitions. Royar confirmed this is something the department is aware of.

Royar asked whether the working group is comfortable ending discussion of key topics at this point. Martin and Lawrence began to ask about followup processes, and Royar transitioned to next steps.

AGENDA ITEM C

Royar stated that final recommendations [on the points discussed by the working group] to the legislature will be developed by the commissioner, and then this group will have a chance to weigh in on that recommendation through several further rounds of process. She outlined the following tentative schedule:

- 1) October or November public meeting with draft recommendations by the dept informed by discussion by this group
- 2) Recommendations made to the commissioner based on public meeting feedback
- 3) Commissioner's report to the legislature due January 15 2023
- 4) Final recommendations to Fish and Wildlife Board in Jan or Feb 2023
- 5) Final regulations approved through standard Board process Dec 2023

Martin asked why there is so much time between now, the commissioner's recommendations, and final approval of the regulations. Royar explained that this is to allow public feedback to be included in the process/recommendations.

Bourbeau asked whether all materials the working group has gone through will be available for the public record. Saunders explained the department typically has a web page for materials for the public record [in similar public comment processes], and that the department will likely include supporting docs, videos, minutes on such a page. Royar promised to send a link with all supporting materials to working members, Bourbeau asked if working group members would be able to add materials if the department list did not capture them; Royar confirmed this.

Decker raised the question of funding, stating that he believes the costs of trap updates for 400 trappers would be more or less \$192,000, and another \$192,000 for exclusionary devices to improve traps for roughly 400 trappers per these likely recommendations – roughly in total \$400,000. Bray noted that 80% of Vermont trappers are already using BMP style trappers and asked if this is accounted for Decker's the figure? Decker explained these are back of the envelope numbers to frame a ballpark.

Decker also stated he knows the department is making recommendations to the commissioner. He states that he hopes the department will recommend use of BMP traps for all trapping even if they are not regulated or legislated – similar to the department's hunter orange recommendation.

Galdenzi stated that thinking about future funding for newer traps, trappers in VT pay \$23 dollars for a trapping license but the average trapping license in other states is \$35. She suggested the department raise the trapping license fee to be in line with other states and that excess could be put towards trap replacement.

Bray replied to Galdenzi that fees are just supposed to cover operating costs. Fees are not designed to be money-making. Galdenzi stated there is not data on the costs of “the trapping program”. Royar clarifies that the department has a furbearer conservation program, of which managing trapping is a small part.

Bourbeau brought up landowners, asking whether there is an agreement that landowners would be subject to the same regulations as trappers. Royar noted this was a parking lot issue. Bourbeau stated that she is aware this would require a change in statute. Royar stated the department will make sure it is in the minutes.

Royar thanked the group for their hard work and stated that the group rose to the challenge before it.

The meeting was adjourned at 7:40 pm.
