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REPORT TO THE JOINT STANDING COMMITTEE ON INLAND FISHERIES AND WILDLIFE

120TH LEGISLATURE

Review of Animal Damage Control Program and Associated Policies

AS REQUIRED BY L.D. 229; RESOLVE 2001 CHAPTER 8

RESOLVE, DIRECTING THE DEPARTMENT OF INLAND FISHERIES
AND WILDLIFE TO SUBMIT A PROPOSAL TO
ENCOURAGE THE HARVEST OF COYOTES

Prepared by the Department of Inland Fisheries and Wildlife Wildlife Division January, 2002

APPROVED CHAPTER

MAY 02'01 8

BY GOVERNOR RESOLVES

STATE OF MAINE

IN THE YEAR OF OUR LORD TWO THOUSAND AND ONE

H.P. 199 - L.D. 229

Resolve, Directing the Department of Inland Fisheries and Wildlife to Submit a Proposal to Encourage the Harvest of Coyotes

Sec. 1. Department of Inland Fisheries and Wildlife to submit a proposal to encourage the harvest of coyotes. Resolved: That the Department of Inland Fisheries and Wildlife shall undertake a review of its animal damage control program and associated policies as they relate to the deployment of trappers to snare coyotes from deer yards during the winter months and other related matters. Program accomplishments, shortfalls, concerns and opportunities must be identified in consultation with regional coyote snaring steering committees already established by the department. The department shall present a report of the review to the Joint Standing Committee on Inland Fisheries and Wildlife by October 1, 2001, along with specific plans describing the nature of the program that the department will implement during the winter of 2001-02 in areas where predation by coyotes is posing a threat to deer.

Report to the Legislative Joint Standing Committee on Fisheries and Wildlife

By The Department of Inland Fisheries and Wildlife Coyote Control Program 2001-2002

Background -

The Department of Inland Fisheries and Wildlife was directed to establish and maintain a coyote control program in 1985. The 117th Maine Legislature (1995) mandated, through LD 793, that the Department of Inland Fisheries and Wildlife "conduct a study to determine the impacts that coyotes have on deer, and to propose recommendations to encourage the harvest of coyotes". The report, authored by deer biologist Gerald Lavigne, assembled published information and department observations to estimate the impact of coyotes on Maine's deer population and provided recommendations to focus the coyote ADC program and enhance wintering habitat conservation efforts. This report serves as the basis for our current coyote snaring program. The 120th Legislature Joint Standing Committee on Fisheries and Wildlife asked the Department of Inland Fisheries and Wildlife to seek comments from regional snaring committees and review its Coyote Control Program, take input from the public, and consider changes for the 2001-2002 winter snaring season (Title 12 MRSA §7035) that would improve program effectiveness and enhance public participation. Some background information from 1995 report is pertinent to the current evaluation of the coyote snaring program and is included as the following section verbatim.

From "A Study of Eastern Coyotes and Their Impact on White-Tailed Deer in Maine" Submitted to the Legislature pursuant to LD 793: 1995

Coyote predation on deer may be of sufficient magnitude in some parts of the state to contribute to population declines and/or impede deer population recovery. Effects of coyote predation are the most damaging in parts of the state in which: 1. Wintering habitat quality has been severely reduced; 2. Winters tend to be severe; and 3. Alternate prey is less available. In northern, western, and eastern sections of Maine, inadequate wintering habitat is the primary factor limiting deer populations. There, high predation rates by coyotes are the symptoms, not the cause of deer population problems. In central and southern sections of Maine, habitat quality is better, and we have been able to sustain adequate deer populations despite predation losses to coyotes. In all parts of Maine, allowable harvest to hunters has been reduced (using the Any-Deer permit system), in part, to accommodate losses to coyotes and a host of other mortality factors.

Maine offers the most liberal recreational trapping and hunting opportunities for coyote of any state/province in eastern North America. Coyotes may be hunted year-round and they may be night-hunted from January through April. There is a 14-day early trapping season, followed by a 64-day regular trapping season. Coyotes may be snared in December through March in Maine's unorganized towns under IFW direction. Finally, IFW may direct qualified cooperators to remove coyotes by trapping, snaring, or hunting in any town as part of the Animal Damage Control (ADC) program.

Since coyotes do impact deer populations to varying degrees in Maine, the idea of reducing coyote populations to increase deer is popular among deer hunters. Aside from the ethical considerations surrounding the killing of one species to favor another, long-term suppression of coyote populations over large areas is not biologically achievable using traditional hunting and trapping techniques. The coyote evolved with a high and changeable reproductive rate as well as the ability to quickly fill vacant territories by dispersal of juveniles. Both are superb strategies that evolved among coyotes to counter the effects of high mortality rates.

Suppression of coyote populations in Maine would require an annual removal in excess of 70% of the peak autumn population. In the first year, that would require a human-induced mortality of more than 7,000 to 11,000 coyotes. This level of coyote removal has never been achieved in the open rangelands of the western United States, even when poisons were legal for coyote control. In heavily forested Maine, our annual harvests of less than 2,000 coyotes are a far cry from the harvest level that is required to cause coyote numbers to decline.

Major alterations in harvest strategies for coyote which increase IFW's financial and manpower commitments, or which divert these resources from other necessary functions while also failing to provide long-term suppression of coyote populations, cannot be reasonably justified. Therefore, bounty systems, however popular among some members of the public, cannot be recommended as a viable option to increase either the deer population or hunter harvests of deer in Maine.

It may, however, be feasible to intensively remove enough coyotes from small areas to temporarily reduce their impact on deer. In fact, some of our ADC cooperators who snare coyotes in winter may temporarily reduce coyote predation in some individual deer wintering areas. However, these small locations appear to be quickly repopulated with coyotes, since there are usually as many coyotes available for capture during the next yarding season. Therefore, any positive effects of coyote removal remains localized within a small area and are temporary at best.

The following recommendations were offered for consideration in the report to the Maine Legislature in 1995 in response to LD 793:

- 1. Inland Fisheries and Wildlife's Animal Damage Control (ADC) program should be examined relative to removal of coyotes in winter. Currently (1995), IFW expends 10-15% of its annual ADC budget directly on coyote control efforts. This includes contracts with trained ADC trappers that snare during winter months in deer yards, and hourly wages and mileage reimbursements for ADC trappers responding to local or temporary deer yard impacts by coyotes. These coyote control efforts now total approximately \$5,000 to \$15,000 annually, depending on the severity of the winter, the identification of areas with higher coyote impacts, and the availability of ADC trappers trained in the use of snares. It may be desirable to focus ADC efforts away from areas where the deer population is already thriving or away from areas where depleted wintering habitat cannot support higher deer numbers. Coyote control efforts should also be avoided in areas where deer cannot be hunted. Therefore, effort could be directed at areas most likely to see a benefit. Inland Fisheries and Wildlife is currently working towards redirecting the funded portion of our snaring program (as opposed to the opportunities for recreational snaring) towards areas where deer may benefit most from local, temporary reductions in covote numbers.
- 2. Recognize that the real obstacle to attaining a higher deer population in more than half the state is the declining quality and quantity of wintering habitat for deer. A real

opportunity exists to improve long-term carrying capacity for deer if we can find an efficient way to protect and enhance a minimum of 1.5 million acres of deer wintering habitat statewide. Committing state funds and effort towards habitat conservation would, in the long run, be far more cost-effective than in engaging in widespread coyote killing campaigns. Currently, the Wildlife Division is working with large industrial landowners to plan, on a landscape or watershed basis, for maintaining and enhancing deer wintering cover. This approach allows a cooperative management philosophy that will provide for deer and other wildlife in areas many times larger than traditionally zoned deer yards. IFW will continue to expand its efforts for cooperative management arrangements on a landscape basis with all willing landowners.

3. Coyote bounties are not a viable option for achieving higher deer populations. Unless a bounty system can remove more than 70% of the coyote population annually, and prevent rapid recolonization from surrounding states and provinces, real suppression of coyote populations can never be achieved. Also, bounties are not directed and do not remove the animal that may be causing the greatest impact. Animal damage control efforts are always most effective when the specific problem animals are targeted

The Department has been following these recommendations and priorities given to the legislature in 1995 in its efforts to protect deer in critical yards through winter ADC snaring, and by entering landowner agreements for protecting deer wintering habitat. The Department has allocated \$20,000 - \$25,000/year to finance the program.

Continuing concern by some people for protecting wintering deer in areas of the state where populations are low led to recommendations to the 120th Legislature in 2001 to enhance the take of coyotes through the winter snaring program. The Legislature responded to this public request by asking the Department to gather public recommendations for improving the effectiveness of the winter snaring program to encourage the take of coyotes by participants in the program.

The Department met with all regional snaring committees (committees made up of the Regional Wildlife Biologist, a Warden, and a trapper/snarer member of the public) and also with other interested snarers to gather recommendations for improving the snaring program. Notes and documents from the Regional Snaring Committee meetings and Regional Wildlife staff pertaining to the Department's snaring operations and public snaring activities were distributed to an ad hoc statewide Committee assembled for the purpose of consolidating input and making recommendations to the Department for changes to the snaring program. This Committee met in Bangor on September 23, 2001 to make recommendations. This report contains the recommendations of that Committee and the Department's response to the recommendations for improvements to the efficiency and effectiveness of the snaring program.

Participating in the discussion were Norman Trask (representing the Maine Trappers Association), George Smith (representing the Sportsmens' Alliance of Maine), Jennifer Burns (representing Maine Audubon Society), Don Dudley of Patton, Max Yates of Farmington, Jerry McLaughlin of New Sweden, Leo Keiffer of Caribou and Eldon McLean of Madison (several active snarers), and Mark McCollough from the Department. Ken Elowe from the Department led the discussion. Ron Joseph, representing the USFWS, was unable to attend, but the USFWS has reviewed the program independently.

The Committee's input was organized according to 6 general areas of concern and notes for each topic were taken and reviewed by Wildlife Division staff throughout the State. Department Administrative staff developed the final response to recommendations based on all input.

Following is a brief summary of those issues. The recommendation provided by the Committee is shown in bold, and the Department's response and recommendations follow.

Issue I: Training:

1. Increase the number of training courses, especially prior to December 1, with more than 2 venues per region each year.

IFW Discussion

Since 1984 the number of seminars or training sessions provided each year has been determined by interest and need, and the requirement for re-certification. This has varied with the number of inquiries, the nature of changes in policy, and number of snarers who needed biannual certification. At least three seminars have been held each year (in Ashland, Milo, and in Washington County) reflecting the regions with most active snaring activity. Training is of two types: 1) explanation of the policy, purpose and reasons for procedural requirements and limits; and 2) a demonstration of how to snare effectively, selectively, and safely. These can be, and have been, combined in some seminars, while in others only the updated policy discussion was necessary for re-certification. While we agree that there should be adequate opportunity to learn the skills of trapping, there is no need to provide lengthy "how to" sessions in each region.

Timing of the snare seminars has varied according to other needs and priorities of the regions, and around trapping season, moose and deer hunting, and bear guiding activities, in which coyote snarers are generally involved. It should be remembered that the Department has been criticized for spending its limited funds on extensive training, instead of on payments to snarers for operations. Clearly there must be a balance, and to fully accommodate new snarers, more training should be offered.

IFW Recommendation: Each of 5 regions will hold at least one annual seminar with an opportunity to learn basic snaring techniques. There will be at least 3 daytime seminars in the future for those individuals who need or want more intensive "hands-on" training in the use of snares. These training sessions will be scheduled as follows:

Region C – Alternate between Princeton area and Jonesboro area

Region D – Alternate between Farmington and Rangeley (daytime next year if needed).

Region E - Jackman

Region F - Milo (daytime)

Region G- Alternate between Ashland and Fort Kent (daytime)

Additional multiple sessions will be held if need or interest is sufficient. The respective regions may make a determination based on the request of at least 10 snarers if they call the Regional Office number provided. In the future these training sessions will be held between September and early December.

The certification/re-certification seminars will fully explain and update the policy and procedures, new devices, technology, and techniques, and any issues relating to snaring (such as lynx or eagle

issues) and will satisfy the requirements to be certified or re-certified to snare coyotes. The daytime training sessions will include that information as well as a full demonstration and more extensive opportunity to set snares and learn techniques. Instructors for all sessions will include willing, fully certified snarers selected from the roster and will be paid \$50.00 plus .30 /mile.

2. Use Certified Maine snarers for instructors

IFW Discussion

The Department has traditionally used the most expert Maine snarers to serve as trainers. Periodically an expert from a different state or province is invited to provide new ideas and experience. However, each region has at least one snarer who has the expertise to provide such training and is willing to do so. The Department pays instructors for their time and mileage.

<u>IFW Recommendation</u>: MDIFW will provide the highest level of training using the most experienced and skilled snarers available. Maine snarers will be used whenever available at regional training sessions (see #1 above). The Department will continue to invite "outside" experts to provide new ideas and insights, or as new technology becomes available.

3. More hands-on training.

IFW Discussion

Snaring is considered a form of trapping, and the general skills are developed through trapper training courses and experience in the field. New snarers must accompany an experienced snarer before snaring independently.

<u>IFW Recommendation</u>: Continue to emphasize the importance of procedures and rules and provide statewide opportunity for hands-on training (see #1 above).

4. Encourage involvement of new people in the snaring program.

IFW Discussion

It is possible that there are some individuals who would become more involved in snaring if there is additional promotion by the Department.

IFW Recommendation: In addition to the usual notification of all snarers on the Department Roster of active snarers, notice of seminars and meetings will be sent to SAM, MTA, The Maine Sportsman, and I&E media for more public dissemination of news relating to coyote snaring. Snarers will be encouraged to bring or invite others to attend. These notifications will include a general statement of the purpose and objectives of coyote snaring.

- 5. Establish or re-examine the requirements for becoming fully certified for snaring. It was suggested that novice snarers accompany 2 or 3 certified snarers for 1-3 days; and to be fully certified they must have more than 1 season of experience and training.
- 6. Regional snaring committees that make certification decisions should have a common set of requirements.

IFW Discussion

The purpose of Full Certification is to delineate the more skilled and experienced snarers from those who are less experienced, less sensitive to Department objectives, less active, or less effective or selective in catching coyotes. The full certification is also used as criteria for deployment, payment, and degree of independence (type of waivers) granted. In the past Department staff made that determination based on somewhat subjective criteria that were subject to some inconsistency between regions. The snaring committees were established, in part, to bring about more objectivity to the process - but did not adequately reduce the inconsistencies.

IFW Recommendation: Any snarer who is not fully certified must accompany a fully certified snarer for at least two days before operating alone. A conditional snarer may then become fully certified upon meeting the following specific criteria:

- 1. Satisfactorily complete a snaring education course within 2 years.
- 2. Complete two seasons of active snaring as a "conditional" snarer.
- 3. Demonstrate proficiency by successfully capturing a minimum of 5 coyotes by snare during that period.
- 4. Demonstrate selectivity and compliance with the snaring policy and fish and wildlife laws and rules.

7. Continue/update education of existing snarers.

IFW Discussion:

Currently all snarers must attend a snaring seminar once every two years.

<u>IFW Recommendation</u>: Continue to require attendance at a coyote snaring training seminar on a two-year schedule. Specific changes in policy will be disseminated to all registered snarers as they occur. The Regional Biologist or other approved trainer may provide individual training.

8. Use Regional Biologists to disseminate information.

IFW Discussion

Regional biologists are responsible for explaining and carrying out the policies of the Department. Sometimes these policies have been changed, or undergo an evolution of change as a result of political or legal events, making it difficult for regional staff to keep pace with those events. The committee commented that they felt that there have been inconsistencies in the interpretation of these policies by the various regions.

<u>IFW Recommendation</u>: The Department will ensure that all regional personnel are familiar with the policy and that they relay that information consistently.

Issue II: Deployment/ Notification

9.Inconsistency in implementing deployment policy by Regional Wildlife staff. The Committee feels there have been inconsistencies between regions as to where and when snarers would be allowed to snare.

IFW Discussion

Snaring can be carried out by snarers without being deployed – or without a specific request or directive by a department official. Such snaring must be in compliance with the snaring policy. "Non-deployed" snaring generally occurs without an explicit Department request, but requires notification.

Deployment is the explicit request by the Department that a snarer operates in a given area or under special conditions.

The procedures and criteria used previously to deploy snarers and provide waivers often vary between regions, usually because of differences in circumstances (snow conditions, wintering deer activity, etc), and different approaches to predation issues by Department staff. However, the intention of the Department is the same throughout the State and should be emphasized consistently throughout the snaring regions. The Regional Snaring Committees were established specifically to resolve any problems that might have developed over these issues.

<u>IFW Recommendation</u>: As stated above, the Department will ensure that all personnel are familiar with the policy and relay that information consistently. Also, no conditional or fully certified snarer will be denied the opportunity to snare within the guidelines of the snaring policy. The Department will pay any deployed snarer if he/she requests it.

10. Wardens are out of the loop, and should have more authority because they are more available than biologists.

IFW Discussion

It is not the intention for the wardens to be out of the loop of information regarding the snaring operations in their areas. It is expected that all district wardens be familiar with the snaring activity in their district, by communicating with the regional/division office, the designated warden serving on the snaring committee, and by attending training sessions. It is important, however, that deployment of any snarer be coordinated closely with the regional biologist. Sensitive areas, such as habitats frequented by bobcat, eagles and lynx are the responsibility of the Regional Biologists. Any expectation of payment MUST be approved by the regional biologist to ensure that proper reports and payment schedules are maintained.

IFW Recommendation: District Wardens will not deploy snarers. To avoid any delays, such as a weekend when the biologist may not be available, snarers should take the opportunity early in the season to meet with them, discuss where and how they want to snare, and reach agreement on preliminary plans to operate in those areas they select. This will avoid delays if the biologist can't be reached immediately.

In addition, all Department personnel involved with snaring will be well versed in the intent and implementation of the snaring policy. Each of the regional biologists will organize at least one joint meeting between wildlife staff and district wardens to discuss the policy and reach a common understanding of that intent. The trapper representative on the regional snaring committee will participate in that meeting.

11. Lack of support for snaring throughout MDIFW.

IFW Discussion

The maintenance of a coyote control program to remove coyotes from deer yards in winter is required by state law, and will be implemented in a professional manner.

IFW Recommendation: The Department will facilitate and encourage coyote snaring among the public, to be carried out by volunteer and paid individuals without reluctance by any Department personnel. All Regional staff will provide the necessary support to snarers (logistical support such as deployment, identification of lynx areas, etc.), participate in training programs, and carry out deployment and certification procedures according to simplified criteria contained in this report. All individuals who wish to set snares and take coyotes during the winter months will be given the opportunity to snare coyotes within the procedures in the snaring policy. Department personnel will make approvals a high priority, but are not expected to expend additional time themselves that would detract significantly from more critical management and enforcement efforts.

12. Need checks/balances if biologist or warden not cooperative.

IFW Discussion

It has been the intention that the Regional Snaring Committee be used to resolve regional snaring issues among wardens, wildlife staff, and snarers. If that committee fails to do so, the issues have been referred to the ADC coordinator for action at higher administrative levels.

<u>IFW Recommendation</u>: Whenever the regional biologist or the regional snaring committee cannot resolve an issue relating to coyote snaring, it will be brought to the attention of the Wildlife Management Section Supervisor in Augusta, who will seek a resolution of the matter in concert with the Warden Service and Wildlife Division Director, or others as necessary.

13. Need program to be more proactive vs. reactive – all yards should be protected

IFW Discussion

It is recognized that local, short-term benefits to wintering deer survival may result from focused coyote removals by snaring where predation is severe. The early onset of winter conditions in some years in northern Maine has justified December snaring in that region. The degree to which the Department has directed snaring has depended on local weather (snow depth, crust conditions, temperature, etc.) and snaring conditions and has largely been a reactive response. However,

some regions have identified known, recurring sites of heavy predation, and snaring is deployed accordingly.

IFW Recommendation: The Department will direct all staff to encourage snaring in historical or known predation areas and as requested or recommended by snarers. As in # 9 and # 11 above, no conditional or fully certified snarer will be denied the opportunity to snare within the guidelines of the snaring policy, and all individuals who wish to set snares and take coyotes during the winter months will be given that opportunity.

- 14. Snaring should start early (December) in yards containing deer and documented predation.
- 15. March and December season allow/deploy fully certified snarers treat like January and February.

IFW Discussion

The onset of severe winter conditions, usually in December, begins a process of deer yarding, and presents unique opportunities to snare coyotes during a period of relative predator abundance in the population cycle.

The spring months beginning in March are considered particularly effective predator control periods, but non-target animals are more vulnerable because of their increased activity during breeding season. Deployments have routinely been approved in March if the snarer is well qualified. However, deployment during these months has not been consistent.

<u>IFW Recommendation</u>: All snarers will be allowed to set snares for coyotes in December consistent with the policy (notification, etc.). Only Fully Certified snarers may operate in March to ensure the highest level of protection for non-target species. Deployed snarers may be paid.

16. Should be able to snare without being paid.

IFW Discussion

There has never been a requirement that only those being paid could set snares. It has been the practice by some personnel that snaring be allowed only if justified by high predation in deer yards, and in that case snaring would be paid for by the Department. It is difficult to define a predation "problem" and it has, therefore been highly contentious.

<u>IFW Recommendation</u>: As discussed elsewhere, fully certified snarers who request it will be paid for snaring coyotes when deployed by Department staff. Otherwise, anyone meeting the qualifications and conditions of the policy may set snares without being paid.

Issue III: Tending rules

17. Why are number of snares limited?

IFW Discussion

The limit on the number of snares was set in the initial years of snaring to ensure that sets would not be lost, left, or untended so they damaged other wildlife. In the past, a warden or biologist often waived the limit. Among good snarers, it has not been a significant issue, and therefore fully certified snarers should have no limit, so long as they are able to keep track of all snares set and are able to tend them effectively.

<u>IFW Recommendation</u>: Fully certified snarers have no limit on the number of snares or areas in which they may set. Conditional snarers must observe a limit of 30 snares and two areas as in the policy. All snarers must be able to account for all snares at any time (existing policy).

18. Snares should be tended at least twice per week, or no less frequently than 4 days.

IFW Discussion

The pros and cons of snare tending intervals are difficult to accurately determine. Shorter tending limits may improve the chance for non-targets to be released unharmed. Longer limits would reduce the time and effort required to maintain remote sets. But shorter limits — with more frequent disturbance of the tending — may also reduce coyote catches. Snares are intended to be "killing" sets, justifying longer tends. In mid-winter, survival of trapped animals over 24 hours is unlikely. However, there is a social concern about not tending traps frequently. Overall there seems to be good reason to tend traps at least every 3 days.

IFW Recommendation: Snares must be tended at least once every 3 days (72 hours).

19. Waiver of up to 7 days should be available for entire season from Department.

IFW Discussion

Because of the lethal nature of coyote snares, and the benefits to snarers of less frequent tending requirements, a relaxation of the tending rules is sometimes beneficial, and has been granted when a snarer has a good reason for it. This leads to favoritism and inconsistencies. A more standardized approach is desired.

<u>IFW Recommendation</u>: Fully certified snarers may be issued a tending waiver of up to 7 days by the Regional Wildlife biologists in writing for a specified time, or up to an entire season, in certain areas if; 1) the snarer is operating at a remote site, or otherwise has difficult access to snare sites; and 2) prevailing snow conditions or weather patterns do not increase the chances of catching non-targets or particularly vulnerable species, or conflict with other public activities.

Issue IV: Bait/Snare Stops/Breakaway Devices.

20. Snares must be set more than 50 feet from bait and more than 5 yards from edge of the opening (reduced from 50 <u>yards</u> and 10 yards (in the woods – no snare in the opening to avoid eagle catch).

IFW Discussion

The early policy on bait placement was to "hide" bait from over-flying eagles. The change to avoid eagle catches by placement of bait in the open while snares are set back into the woods 150 feet (50 yards) from any snares, was an important policy decision made over 10 years ago in response to the unfortunate capture of 2 eagles at that time. This policy change essentially eliminated the temptation for eagles to walk through the woods to reach bait and get caught in snares. While it may be possible to reduce this distance of bait from snares, the argument to do so is not compelling. Furthermore, eagles are increasing in abundance statewide, and this policy is providing more snaring opportunity. Reducing the setbacks from bait at this time may increase the vulnerability of eagles.

IFW Recommendation: The policy will not be changed.

21. No requirement to bury bait.

IFW Discussion

This question arose over the suggestion that, if bait were buried, it would not attract eagles and other non-targets, and the setback from bait could be waived. Buried bait can be found by predators/scavengers under many conditions and then be disturbed and exposed by them. Since eagles may be an issue statewide, bait should be separated from snares by at least 150 feet (50 yards) – whether buried or on the surface.

<u>IFW Recommendation</u>: There is no requirement to bury bait, and the set back and other requirements remain in place for all bait situations.

- 22. Stops should be used in sensitive areas (and tend every 3 days, and >3 inches for lynx, \sim 3 inches for eagles).
- 23. Stops and breakaways okay as written, but need to ensure consistent requirements statewide.

IFW Discussion

Snare "stops" to restrict snare closure have been used to reduce the chance of inadvertently holding eagles, deer and other furbearers. Their success in reducing risk to eagles has never been demonstrated and the placement of bait away from snares has been the critical factor in avoiding eagles. Historically, unintended lynx captures have not been an issue in the snaring program. While the use of "stops" may seem to be justified to reduce the risk to non-targets, there is evidence to suggest they may be inhumane by preventing snares from killing coyotes quickly. Breakaways have been effective in allowing deer to escape if caught by the foot, although less so if caught by the neck or head. In any case, the use of breakaway devices to release deer inadvertently caught in snares is considered a better alternative to snare stops.

<u>IFW Recommendation</u>: Snare stops will not be required and the tending period will remain at 3 days. Deer breakaways are required on all snares set within deer concentration areas.

Issue V: Non-targets/lynx considerations.

24. Lynx areas to be demarcated by well-documented and verified lynx sightings.

IFW Discussion

The criteria for delineating sensitive lynx areas are not standardized among regions. However the regional wildlife biologists have used their professional judgment to identify the most credible and well-documented evidence from a variety of sources (Department sightings, track surveys, USFWS information and reports from credible observers) to designate lynx areas.

<u>IFW Recommendation</u>: While the department will review lynx areas and other types of delineation, the current system employed by the wildlife division will be used until another system is developed. History demonstrates that winter coyote snaring is an extremely small risk to lynx; however, the Department has a responsibility to protect lynx and will make every effort to protect lynx as new information allows us to determine the best way to avoid conflicts.

Issue VI: Other

25. Conflicts with houndsmen.

IFW Discussion

The conflict between houndsmen and snarers has increased in recent years. Houndsmen may take large numbers of coyotes in a very selective way, reducing impact on non-target species. The conflict is essentially one of hazard to dogs from snares. As with snarers, the Department is supportive of houndsmen because of their success and selectivity.

<u>IFW Recommendation</u>: Regional biologists and wardens will make every effort to facilitate communication between snarers and houndsmen who are active in the same area. We also expect these groups to communicate with one another on their own. In special circumstances the Department may deploy houndsmen and, if requested, pay them for their coyote removal effort.