

Director Ed Schriever Idaho Department of Fish and Game 600 S. Walnut, Boise ID 83712

Idaho Fish and Game Commission

March 12, 2020

PETITION FOR ADOPTION OF RULE

Director Schriever and Commissioners,

We the undersigned organizations, on behalf of our members and supporters in Idaho and across the country, hereby petition the Idaho Department of Fish and Game and Idaho Fish and Game Commission to adopt a regulation requiring trappers to place signs at public trailheads and on public trails and campgrounds within 25 feet of traps and snares. These signs should be visible from at least 25 feet to help alert trail users to take action to avoid the injury or loss of a family dog or injury to a child. We request that the Department also place visible signage in active wolf hunting areas from April 1 through August 30 to warn campers and hikers of the increased risks of active hunting in the area to themselves, their families and their dogs during the recently extended wolf hunting season. This petition for the promulgation of a rule is submitted pursuant to Idaho Code 67-5230.

The Issue

The Idaho Department of Fish and Game Commission recently extended wolf hunting seasons from August 30 to March 31 to August 1 to June 30 or year-round on private lands and public lands in units 15, 18, 22, 23, 24, 28, 29, 31, 32, 32A, 33, 36A, 37, 38, 39, 40, 41, 42, 43, 44, 46, 47, 50, 51, 53, 54, 55, 56, 57, 62 and on private lands in units 19, 20A, 25, 26, 27, 34, 35, 45, 48, 49, and 52A. The lands are also used by the public for recreational hiking and camping and who often bring their dogs and children with them. This effectively places hunters in the woods during much or all peak summer camping and hiking seasons increasing the risks that a child or family dog may be accidentally injured or killed. This increases the risk to livestock guardian dogs and herding dogs as well that may be mistaken for a wolf and accidentally killed. It also increases the risk of fires with added ammunition discharges during the summer dry season. Most campers and hikers are not aware of this new rule and will be unprepared for taking appropriate measures to safeguard their pets and family members. The most common wolf trap MB750 requires (for the average person) specialized equipment to release the jaws adding to the importance that people know about the presence of wolf traps. And snares may eliminate a dog's ability to sound an audible distress.

Additionally, the Idaho Department of Fish and Game allows trappers to set leghold and snares only 10 feet from any "maintained unpaved public trail." Trappers can legally "place any ground set incorporating snare, trap, or attached materials just over three hundred (300) feet of any designated public campground, trailhead, paved trail, or picnic area.

Trappers are also allowed to "trap wolves beyond 30 feet of a naturally killed big game species as long as the carcass is left undisturbed." And "To trap wolves beyond 30 feet of a legally-

salvaged road kill.” They often use liquid scent to lure wolves and coyotes to the trap or snare area. These scents are also attractants to dogs.

Ground sets are defined as “any foothold trap, body-gripping trap or snare originally set in or on the land, including any traps elevated up to a maximum of 36 inches above the natural ground level. Snares must be equipped with diverters and either a break-away device or a stop within the snare loop.” And they can use large foot-hold trap up to a nine-inch spread.”

An Uninformed Public

Most Idahoans are unaware that trappers are legally allowed to place traps so close to public trails and campgrounds. They are also unaware of the procedures for safely removing a dog from a leghold or body gripping trap or snare. And while the Idaho Department of Fish and Game suggests that trappers use a sign that they can download from the website, they are not required to do so. The sign contains minimal information for removing a dog from a trap or snare, which most people will be unprepared to do especially if their dog is in pain and struggling to get away. Traps and snares are difficult to spot. And the sign provided by Idaho Department Fish and Game is not easy to read from even from 10 feet away (only “Caution” stands out from that distance) and certainly cannot easily be read from 20 feet or more.

People running or hiking with their dogs have as much right to use the public lands safely as trappers do. If they are unaware that traps or snares are in the area, they may lose sight of their dog and then be unable to rescue it in time to avoid death especially if the snare or foot-hold trap chokes off the dog’s breath. These traps and snares are often scented with a lure that will attract dogs to them. Dogs can detect scents like these from hundreds of feet away or more drawing them away from their owner to the trap or snare. And while the video provided online by the Department offers some good advice, less than 5,000 people have viewed it since 2015.

Idahoans take pride in their love of the outdoors and often enjoy the opportunity to share it with young children and their beloved dogs. We ask you to take action to ensure that our families and our dogs are safe from these risks on our public lands.

Sincerely,

Garrick Dutcher, Living with Wolves, Idaho

Pam Conley, Great Old Broads for Wilderness, Idaho Chapter

Lisa Kauffman, Idaho Director, Humane Society of the United States

Suzanne Stone, Wildlife Conservation and Coexistence Specialist, Idaho

