



IN REPLY REFER TO:

United States Department of the Interior

FISH AND WILDLIFE SERVICE

Minnesota Valley National Wildlife Refuge
4101 East 80th Street
Bloomington, MN 55420



November 2, 1987

Memorandum

To: Regional Refuge Supervisor (RF1)
From: Refuge Manager, Minnesota Valley NWR
Subject: Amendment to the Interim Trapping Plan

Attached is an amendment to the current Minnesota Valley National Wildlife Refuge Interim Trapping Plan. Approval for this amendment and the following listed changes to the 1987 Trapping Proposal dated October 9, 1987 is requested. Please return an approved copy of this page to our office.

- Special permit conditions of the 1987 Trapping Proposal should be expanded as follows:

E. Special Permit Conditions

4. Only beaver, raccoon, muskrat, and mink may be trapped. Each trapper shall provide a record of all animals taken within their unit and submit this report as directed by the refuge manager.
5. Trapping season shall be from December 1, 1987 to February 29, 1988. Hours for checking and setting traps are 5:00 am to 7:00 pm and traps must be checked every 24 hours.

Edward S. Crozier

Attachments

Approved: 

Date: 11/16/87

Disapproved: _____

Date: _____

AMENDMENT TO THE INTERIM TRAPPING PLAN
October 30, 1987

Minnesota Valley National Wildlife Refuge
Bloomington, Minnesota

This amendment provides for changes to the Minnesota Valley National Wildlife Refuge Interim Trapping Plan dated July 1981. The changes, deletions, or additions are listed below.

- The first paragraph under Section II.C. should be changed to read as follows:

The recommended alternative provides for the trapping of mink, muskrats, raccoons, and beaver in wetland environments. The program will be a wildlife management, recreation and educational type program.

- The following information should be included at the end of Section II.C. as an additional species listing.

Beaver - Beaver are expert dam builders which provide benefits and detriments to refuge wetlands. Beaver build dams that provide greater open water areas for wildlife, but the beaver can also plug water control structures and culverts which may cause flooding. Beaver populations shall be reduced by trapping when their activities are a continual nuisance to refuge operations.

- The first sentence of the first paragraph under Section II.C.2. should be read as follows:

All furbearers other than muskrat, beaver, mink, and raccoon will be released unharmed where possible or turned over to the refuge manager where injuries preclude their release.

- Under Section II.C.5.b., the first paragraph should be changed to read as follows:

Method of permittee selection - Selection of trappers will be by lottery. Applications for the trapping season and conduction of the drawing will be done at times determined by the refuge manager, but within 90 days prior to the opening of the season. Selectees will be notified by mail within one week. Alternates will be selected in case a selected trapper could not participate. Selected trappers will be eligible year after year.

- Also under Section II.C.5.b. eliminate the third listed condition which states:

The trappers, both experienced and novice, will be required to take the trapper education course developed by the Minnesota Department of Natural Resources.

- Under Section II.C.7. the last sentence of the second paragraph should read as follows:

The refuge trapping season will begin and end within the framework of the state trapping season.

INTERIM
TRAPPING PLAN

MINNESOTA VALLEY NATIONAL WILDLIFE REFUGE
BLOOMINGTON, MINNESOTA

July 1981

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I. PURPOSE AND NEED FOR ACTION

The U. S. Fish and Wildlife Service permits the trapping of furbearing animals on national wildlife refuges where it may contribute to, or be compatible with and not be inconsistent with, the management objectives of the refuge. Refuges will NOT be managed, however, primarily to produce furbearing animals for trapping purposes.

Service trapping policy is based on the premise that, given habitat conditions capable of supporting viable wildlife populations, harvestable surpluses are usually available and constitute a renewable natural resource. Regulated consumptive use has no adverse effect, and may have beneficial effects, on the long-term well-being of the wildlife populations and their habitats.

The Service recognizes trapping as an effective tool of wildlife population management and a legitimate recreational activity.

The Minnesota Valley National Wildlife Refuge will have several thousand acres of extensive marshes. These produce large populations of muskrats, mink, and raccoons. Other furbearers found on the refuge include beaver, red fox, gray fox, skunks, badgers and weasels.

These animals have been trapped extensively in the past, both legally and illegally. There is a desire of many trappers to continue the tradition of legal trapping on the refuge. But there is also a need to eliminate illegal and unethical trapping. This can be accomplished through regulation and trapper education.

At times there may also be a need to regulate muskrat populations to maintain appropriate ratios of emergent vegetation to water. A controlled trapping program can help fill that need.

There may be occasional need to remove nuisance animals. Beaver can cause severe water management problems and raccoons do bother some urban neighbors. ~~Some~~^{Star} means is necessary to allow either harvesting or live-trapping and transplanting these animals.

There is a need to expose more people to the refuge and its wildlife dynamics. The effects of trapping versus natural regulation would be a valuable educational topic. An educational trapping program can aid in this exposure.

Relationship of the Trapping Program to Refuge Objectives

Final refuge objectives have not yet been set but will be when the Master Plan is completed. This interim trapping plan will be adapted as needed to fit those objectives. However, several directives are present in the authorizing legislation and all development and management will be aimed at complying with these directives. Some of these directives are:

"Such methods and procedures may include...all activities associated with scientific resource management, ...and education."

"The Secretary shall develop and administer...in accordance with the National Wildlife Refuge System Administration Act of 1966..."

"...may also exercise...conservation and management of wildlife and natural resources, ...wildlife interpretation, and environmental education."

These are all very clear, concise statements that the refuge will integrate wildlife management into interpretive and educational programs. Trapping nuisance animals and a harvestable surplus of muskrats, mink and raccoons is an accepted recreational pursuit and management practice, although poorly understood by much of the public. As such, it is in need of being interpreted properly through an educational program.

Undoubtedly an important objective of the refuge will be to enhance habitat conditions for migrating and breeding waterfowl. The present aquatic habitat is valuable to waterfowl in that there is a diversity of aquatic plant species (submergent and emergent). Muskrats can assist in creating a proper interspersed vegetation and open water through their use of emergent aquatics for food and shelter. Excessive population levels, however, can eliminate broad expanses of vegetation, resulting in a decrease of food and cover for waterfowl. In addition to the destruction of habitat, excessive aquatic furbearer populations can cause structural damage to facilities such as roads, dikes, culverts, etc. Trapping is an established method for maintaining populations at a level which helps reduce damage to habitat and/or facilities.

A public trapping program would satisfy another potential refuge objective-- that of public recreation. There is a high demand for trapping on the refuge by the local public and ^(U.S. Forest Service) has always been considered as a legitimate recreational activity throughout the planning of the refuge.

Trapping is addressed in the Final Environmental Statement on Operation of the National Wildlife Refuge System. An excerpt follows:

"Management of furbearers by trapping is a traditional and widely accepted wildlife management practice. Trapping is, therefore, permitted on units of the National Wildlife Refuge System where it contributes to, or is compatible with, the purposes for which the refuge was established. Management programs may consist of one or a combination of the following related objectives.

"Primary objectives furthering wildlife management goals are:

1. To manage furbearer populations at levels compatible with or contributing to other refuge objectives, i.e., muskrat/marsh/waterfowl use relationships,

2. To maintain furbearer populations at levels compatible with the habitat,
3. To prevent damage to physical facilities (dikes and water control structures) and manipulate habitat (trees and aquatic plants), and
4. To manage furbearers adversely affecting special wildlife projects such as endangered species recovery or restoration projects for trumpeter swans, Canada geese or wood ducks.

"Secondary objectives relating to socio-economic and scientific aspects are:

5. To provide quality wildlife-oriented experiences and educational opportunities consistent with custom^s and traditions in various geographic areas,
6. To provide the public the opportunity to utilize a renewable natural resource,
7. To provide for the harvest of furbearers where it is a traditional and necessary means of support and furbearer populations are not jeopardized, and
8. To provide specimens, both live and dead, for scientific studies.

Trapping was also addressed in "Final Recommendations on the Management of the National Wildlife Refuge System, April 1979. In that publication the Director of the USFWS stated that:

- 1) Service policy continues to be based upon the idea that public hunting, fishing or trapping is a legitimate recreational activity;
- 2) Service policy continues to be based upon the premise that hunting or fishing or trapping need not be engaged in only when populations of species exist in "excessive" numbers, but rather that Service policy be based upon the concept that sound wildlife management produces populations sufficiently healthy to withstand properly limited consumption;

Author

The preparation of this interim plan was coordinated by L. Paul Schneider, Assistant Refuge Manager, Wildlife. He has B.S. and M.S. Degrees in Wildlife Management from South Dakota State University and has worked with the U. S. Bureau of Reclamation and U. S. Fish and Wildlife Service as a biologist and environmental specialist for five years.

Edward S. Crozier, Refuge Manager, Minnesota Valley NWR, 4101 East 78th Street, Bloomington, Minnesota also assisted in the preparation of this plan. Mr. Crozier has a B.S. in Wildlife Management and 25 years of experience in wildlife refuge administration, management and planning. He has been a manager of national wildlife refuges including hunting areas in Wisconsin, Illinois, Iowa and North Dakota and has coordinated planning projects on wildlife refuges through the United States, including Alaska and Hawaii.

II. ALTERNATIVES INCLUDING THE PROPOSED ACTION

Three major program alternatives have been examined. In addition, alternative methods of controlling trapping pressure were considered. No alternatives could begin prior to our control of a marsh by ownership of all contiguous land. Following is a list of the alternatives:

- A. No Action or No Trapping
- B. Open to all Trapping
- C. Muskrat, Mink, Raccoon and Nuisance Animal Trapping
- D. Other Alternatives

A. No Action or No Trapping

This alternative would allow furbearing animals in large areas where there is no outside influence to self-regulate their populations by such natural means as disease, predation, and modified birth rates. Resulting populations would be expected to fluctuate severely in response to weather and habitat changes. This alternative appears to be acceptable from a biological standpoint but would do nothing to continue the trapping tradition, to encourage trapper education, or expose more people to the refuge itself. This alternative would also preclude use of a renewable natural resource. Injury and killing of non-target animals with leghold traps would not occur. We feel that this alternative is needlessly restrictive and not appropriate on the refuge marsh areas where there are so many uncontrollable factors affecting wildlife populations.

B. Open to All Trapping

This alternative would open the refuge to all trappers seeking any legal animal and regulated by State laws. Many of the areas in the refuge have been trapped in this manner in the past. Some

advantages of this system, depending on your perspective, would be low administration cost, high harvest of furbearers, and opportunity for more people to participate. However, a few high pressure trappers could dominate.

The disadvantages include the capture of non-target animals which could be high, and is felt unacceptable in this urban setting. Trapper education would not occur. Strife between trappers could be serious. We feel that this alternative is not suitable for a national wildlife refuge. It is contrary to USFWS goals for environmental education and high quality experiences.

C. Muskrat, Mink, Raccoon and Nuisance Animal Trapping

The recommended alternative provides for the trapping of mink, muskrats and raccoons in the large marsh areas and the removal of nuisance animals elsewhere. The program will be a wildlife management, recreation and educational type program.

The specific species of furbearing mammals that will be trapped in any one year may vary depending on the current assessed population for each species that year. The following is a list of furbearers that have the potential for being trapped on the Minnesota Valley NWR.

Muskrats - Muskrats create openings in dense stands of emergent vegetation and their lodges and feeding platforms provide waterfowl feeding and nesting sites. Muskrat populations shall be maintained at a level that provides optimum benefits for waterfowl by creating openings but below that where excessive vegetation removal and overcrowding and disease occurs.

Mink - It is recommended that this species be harvested through trapping to remove part of the annual surplus and provide some additional opportunity for recreational trapping.

Raccoon - Raccoons are found throughout the refuge in both upland and marsh habitat. Harvest of raccoons by trappers will be permitted in marsh areas during the muskrat and mink season.

1. Determination of Trapping Needs

The trapping of furbearers on Minnesota Valley NWR shall be determined by observing and assessing the impact of each species on the ecology and management of the habitat it occupies. There is no habitat management planned specifically for furbearers, although they will benefit from improvements and development for other species. Actual management activities directly involving furbearers are limited to population surveys and prescribed trapping of a particular species when determined necessary. Removal of furbearers from refuge lands will be recommended in an annual trapping plan after assessing the following factors:

- a. whether the total number of furbearing animals is in excess of the breeding stock required to maintain a population size consistent with refuge objectives, i.e., whether a harvestable surplus is available;
- b. whether there is a public interest in trapping;
- c. whether a high furbearer population (muskrats) is desirable as it influences the abundance and distribution of emergent marsh vegetation.

- d. whether there is excessive predation, competition, or other interaction among furbearing populations and other wildlife species, such as, waterfowl;
- e. whether furbearing animals are responsible for damage to habitat or property on or adjacent to the refuge;
- f. whether population densities are such that they have the potential to transmit contagious diseases among furbearer populations, other wildlife species, domestic animals or man;
- g. whether trapping would have any detrimental effects on the future of any species on the refuge.

Following the assessment of these factors, an estimate will be made as to the level of desirable trapping pressure which will determine the number of trapping permits issued. A specific number of permits will be issued for each trapping area. This number may vary from year to year depending upon the annual conditions.

2. Non-Target Species

All furbearers other than muskrat, mink and raccoon will be released unharmed where possible or turned over to the refuge manager where injuries preclude their release. Instructions for handling birds accidentally caught in traps are covered under paragraph 4. "Special Permit Conditions". The restriction on use of exposed bait is intended to minimize the likelihood of catching eagles and other raptors. Injured raptors will be sent to the University of Minnesota Raptor Rehabilitation Center.

The only threatened species which may possibly be affected by trapping is the northern bald eagle which is present occasionally during late fall and early winter in the Black Dog Lake area. The effects of the trapping program on bald eagles are expected to be non-existent.

3. Methods of Trapping Furbearers

Except where further restrictions are specified under "Special Permit Conditions", all trapping will be done according to State law. One important feature is that all traps must be checked every 24 hours. Inspection may be waived only under extreme or unusual circumstances and with approval of the refuge manager. In case of illness, the permittee will be required to contact the refuge to arrange for someone else to check the traps. Trappers will be encouraged to use drowning sets, "stop-loss" traps and other techniques to assure quick dispatch of trapped animals where possible.

4. Special Permit Conditions

The following special conditions will apply when trapping with a refuge trapping permit on Minnesota Valley NWR, in addition to those listed on the reverse side of Form 3-1726, Refuge Trapping Permit. (Figure 1).

- a. Snowmobile and all-terrain vehicles are prohibited. Outboard motors will be permitted only when authorized in writing by the refuge manager.
- b. Each trapper will be allowed to have one helper who will be authorized to operate the trapline alone only with permission of the refuge manager.

- c. No animals or their parts shall be disposed of on the Minnesota Valley NWR.
- d. All traps, boats and other necessary equipment will be furnished by the trapper and removed from the refuge premises within three days after the close of the season.
- e. Trappers may use only roads and boat launching areas designated for general public use or approved by the refuge manager.
- f. The use of exposed meat or fish baits or animal carcasses in making sets will not be permitted.
- g. All raptors or water birds accidentally trapped shall be turned over to designated refuge personnel on a daily basis.
- h. Each trapper shall provide a record of all animals taken within their unit and submit this report as directed by the refuge manager.

5. Permit Processing Information

- a. Method of program announcements - The trapping program and deadline information will be announced through newspaper releases, notices in public places, personal contacts and other methods at least 30 days prior to trapper selection. This announcement will contain all relevant information needed by those interested in trapping a particular unit in either system.

- b. Method of permittee selection - Selection of trappers will be by lottery. Applications for the lottery will be accepted between September 1 and September 30. Selectees would be notified by mail within about one week. Alternates would be selected in case a selected trapper could not participate. Selected trappers will be eligible year after year.

The number of trapping permits to be issued will be set by the refuge staff in the Annual Trapping Program each August.

The following conditions must be met before an applicant will be eligible to participate in the trapping program:

- The applicant must have had at least two seasons of active trapping experience.
- If the trapper is a novice, he may act as a helper to an authorized trapper.
- The trappers, both experienced and novice, will be required to take the trapper education course developed by the Minnesota Department of Natural Resources.
- The trapper must attend a refuge orientation prior to the issuing of the trapping permit. This orientation will be a brief explanation of the rules, regulations and procedures for the trapping activity. Refuge staff will conduct the orientation sessions.

6. Youth Trapping

Certain trapping units will be designated as youth trapping units and will initially be available only to trappers between age 12 and 18. These units will be selected based on size, accessibility and ease of trapping. Youths will be selected by drawing as previously described. Permittees will be charged a fixed fee payable in cash or check.

7. Methods of Control and Enforcement

The refuge manager and his assistant will oversee the field portion of the trapping program and will enforce all laws pertaining to trapping on the refuge. Minnesota Conservation Officers will assist in enforcing state trapping laws.

The trapping regulations will follow those of Title 50, Code of Federal Regulations, the State of Minnesota, and the special refuge conditions. We will also seek local government concurrence. Trapping will begin the same day as the State season.

8. Fee Charging

There will be a fixed fee that will vary between refuge units and change in price each year according to current fair values and inflation. The fee is to recover the government's cost of administering the trapping program. It will be based on a percentage of the estimated total take not to exceed 10% of the take. During the first year it will vary between \$15 on the smallest units to \$100 on the largest and be adjusted in subsequent years after the refuge knows more about the expected take.

9. Nuisance Animal Trapping

Nuisance animal sets will be closely controlled by individual permit to help avoid capture of non-target animals. Such control could require live trapping and either killing or transplanting the animal. Nuisance trapping would be aimed at specific individuals. Trapper education may be waived on an individual basis for nuisance animal permits. Local government approvals may be required.

10. Trapping Units

Trapping will be restricted to the large marsh areas of the refuge. The purpose of this is to reduce the incidental capture of non-target animals and reduce the interface between trapping activities and the non-trapping public that will be using other portions of the refuge, particularly the uplands and the smaller wetlands and streams.

The marsh areas of the Minnesota Valley NWR will be divided into 6 units for the purpose of trapping furbearing mammals during the fall season. (Figure 2). Units 2 and 5 will initially be designated as youth trapping units. If an insufficient number of youth trappers apply, the youth units may be redesignated as adult units. The designation of these units as to identification are subject to change if desired for administrative purposes, and size and boundary locations could change to insure an adequate harvest. Any such changes will be included in the annual trapping plan. Trapping unit locations are described in the attached maps.

D. Other Alternatives

Several other sub-alternatives were considered. A brief discussion of each follows:

- A fur-share provision was rejected because of difficulties in determining equitable shares. The share system would also have required fur storage facilities.
- A trap-tag system was proposed and rejected. It may have offered slightly better enforcement capability, but would have been more difficult to administer and acceptance by trappers would have been poor. The objective was, as with the current plan, to trap the marshes at a desired level using several trappers rather than a few. More people would then be exposed to the refuge.
- Trapping of other furbearers was rejected for several reasons. Land sets and sets near and in creeks would tend to capture many non-target animals in an urban setting. Use of kill traps away from interior marshes would be unacceptable for the same reason. Enforcement would be very difficult. We also feel it is desirable to allow undisturbed populations of these other animals to exist for the public to see the animals or evidence of their presence.

ALTERNATIVE'S EFFECTS MATRIX

<u>Effects</u>	<u>Alternative A (No Action)</u>	<u>Alternative B (Open)</u>	<u>Alternative C (Muskrat, Mink, Raccoon)</u>
Education	No	No	Yes
Economic Return to Govt.	No	No	Yes
Enforceability	Good	Good	Fair
Population Manipulation	No	No	Fair
Rate of non-target Capture	None	High	Low
Public Acceptance			
Pro-trapping	Poor	Excellent	Fair
Anti-trapping	Excellent	Poor	Fair

III. AFFECTED ENVIRONMENT

The Minnesota Valley NWR encompasses approximately 9,500 acres on the Minnesota River floodplain. It is dominated by numerous spring-fed marshes that were formed by natural levees built up by the river. The vast marsh complexes support abundant and diverse wildlife typical of this area. Adjacent habitats include floodplain hardwoods, wet meadows, bluff hardwoods, native prairies and agricultural lands. Much of the refuge is adjacent to heavily developed urban areas. Figure 2 shows the refuge and the marshes we propose to allow trapping on. A more complete description of the environment can be found in the Minnesota Valley NWR EIS.

The marshes in the Minnesota Valley have been heavily trapped in historical times. Fur trapping was one of the first incentives for European exploration of the valley. Most of the marshes are heavily trapped even now since the refuge does not control them. According to Wingren (1979), adult female muskrats in the Minnesota Valley can be expected to produce about 22 young per year. Trapping mortality rates in the valley are calculated at about 32% of the pre-trapping populations. Other mortality factors can reduce the post-trapping, pre-breeding populations up to 50%. Records for Grass Lake in the Upgrala Unit indicate that the average annual harvest is about 1250-1400 animals. This represents 50-55% of the fall population. Such a harvest has been sustained over many years and appears to be compatible with, probably even complimentary to, waterfowl management which has been the primary management thrust of the Upgrala Holding Company. Rice Lake, in Savage, Minnesota, is open to public trapping and received extremely high, uncontrolled pressure. Yet, muskrat populations remain excellent from year to year.

Muskrats in the Minnesota Valley are very prolific and rapidly fill available habitats, thus providing an annually renewed, harvestable resource. Natural population controls tend to keep them in check but artificial controls such as trapping and water level manipulation are also acceptable. Such man-imposed controls can help stabilize the populations over the long term as opposed to the drastic ups and downs of natural controls.

Minnesota Valley marshes are subject to flooding from the Minnesota River which seems to affect muskrat populations only temporarily. The record flood year, 1979 left good populations of muskrats unharmed, and 1980 populations appear high. Less is known about the specific mink and raccoon populations in the Minnesota Valley, but it is known that the same general population dynamics concepts apply to these populations also.

IV. ENVIRONMENTAL CONSEQUENCES

The proposed trapping plan has many consequences. These are both negative and positive and differ depending on the viewpoint of the person. A listing of impacts follows:

- About 3,000-4,000 muskrats and 100 mink will be trapped and killed each year. Some raccoon captures are also expected.
- About 15 to 40 trappers will be intimately exposed to the refuge and its wildlife, as will their companions. They will also be instructed on proper trapping methods and ethics.
- We will be able to control, to some degree, muskrat populations and their effects on marsh vegetation.
- The government will realize some economic return to help defray the cost of the refuge trapping program. We estimate this to be roughly \$1,500 per year provided all of the large areas in the proposed refuge are trapped.
- Waterfowl remaining on the trapping areas will be disturbed by trappers.
- Trapping as proposed would not detrimentally affect the future of any species. No threatened or endangered species would be affected.
- Law enforcement efforts will need to be stepped up and tailored to trapping enforcement.
- Socially, people may be offended that trapping is occurring on a national wildlife refuge which many feel should be synonymous with sanctuary.

V. CONSULTATION AND COORDINATION

A sincere effort has been made to seek many varying viewpoints on trapping on the refuge. The urban nature of this refuge dictated that intensive public involvement be utilized. This plan was first drafted in November 1980 and made available for public review. This review included agency reviews, presentations at two public meetings in Bloomington and Shakopee in December 1980. A great deal of opposition was expressed by pro-trapping interests.

On January 14, 1981, we met with a group of these people and discussed their concerns. As a result, we removed the age restriction of 20 years old and under², opened the season 14 days sooner and allowed trappers to trap mink and raccoon along with muskrats in the large marsh areas and rejected fur sharing.

On January 16, 1981, we met with representatives from several groups opposed to leg-hold trapping and/or trapping in general, including FATE, Fund for Animals, and the Defenders of Wildlife. As a result of that meeting, we considered language modifications such as using "kill" versus "dispatch", established a minimum age of 12 years old and have continued to emphasize education.

We have also actively solicited comments from numerous others including USFWS staff, Minnesota DNR staff, the Minnesota State Trappers Association and various other concerned individuals and groups. The comments from these groups resulted in adding mink and raccoon trapping and making the program more consistent with the State DNR policies and procedures.

The second draft was made available for a 30-day public review period in January-February 1981. The second draft was distributed to and reviewed by over 100 people with widely differing viewpoints. All comments were considered and incorporated as appropriate. Letters of comment are attached.



United States Department of the Interior

FISH AND WILDLIFE SERVICE

IN REPLY REFER TO:

Minnesota Valley National Wildlife Refuge
4101 East 78th Street
Bloomington, Minnesota 55420

January 29, 1981

Dear Friend:

In November of 1980 draft proposals for hunting and trapping on the Minnesota Valley National Wildlife Refuge were prepared and made available for a 60-day public review period.

As a result of the excellent comments received during the review period, new proposals have been drafted and provided for your review. These drafts will be available for public review and comment until March 2, 1981. At that time final proposals will be prepared and submitted to the U. S. Fish and Wildlife Service Area Manager, Regional Director and the Director in Washington, D. C.

We appreciate your interest in the Minnesota Valley National Wildlife Refuge and are looking forward to your comments on these proposals.

Sincerely yours,

Edward S. Crozier
Refuge Manager

Enclosure

DRAFT Hunting Plan
DRAFT Trapping Plan

(Copies sent to those on attached list)

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Janet Williams
Shakopee Public Library
428 S. Holmes
Shakopee, MN 55379

John Miller
MN Dept. of Education
Capitol Square Blvd.
St. Paul, MN 55101

John D. Pidgeon, City Mgr.
City of Bloomington
2215 W. Old Shakopee Road
Bloomington, MN 55431

Roweena Lauterbach
Carver County Library
Jonathan Village Center
Box 421
Chaska, MN 55318

Int. Ecology Society
Richard Kramer
1471 Barclay Street
St. Paul, MN 55106

Glen Northrop, City Mgr.
City of Burnsville
1310 E. Hwy 13
Burnsville, MN 55337

Gloria Barry
Penn Lake Library
8800 Penn Ave. So.
Bloomington, MN 55431

Bob Waligora
2427 10th Avenue South
Mpls., MN 55404

Brandt Ball
City Manager
City Hall
Carver, MN 55315

Oxboro Library
8801 Portland Ave. So.
Bloomington, MN 55420
(Sent to Gloria Barry @
above address)

John Helland
House Research Dept.
Room 17, State Capitol
St. Paul, MN 55155

Thomas Hedges, City Adm.
City of Eagan
3795 Pilto Knob Road
Eagan, MN 55122

Elizabeth Zdon
Dakota County Library
1101 W. Co. Rd. 42
Burnsville, MN 55337

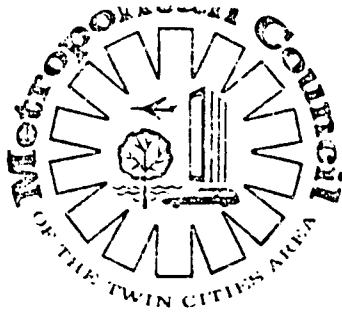
Donald J. Link
511 W. 6th Avenue
Shakopee, MN 55379

Roger Ulstad, City Mgr.
City of Eden Prairie
8950 Eden Prairie Road
Eden Prairie, MN 55343

Barb Hegfors
Savage Public Library
4809 W. 123rd Street
Savage, MN 55378

FWS Offices - TCAO, ARW-PL, I&R,
MB, AE-LWR, FA, LE, SPFO,
LE (St. Paul)

Jim Dustrude
MN Valley Planner - MN DNR
Box 10 Centennial Bldg.
St. Paul, MN 55155



300 Metro Square Building, 7th Street and Robert Street, Saint Paul, Minnesota 55101 Area 612, 291-6359 V 50

February 2, 1981

Edward S. Crozier, Refuge Manager
Minnesota Valley National Wildlife Refuge
4101 East 78th Street
Bloomington, Minnesota 55420

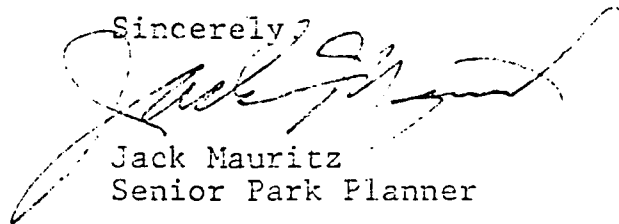
Dear Ed:

We have received and read with interest the draft Hunting and Trapping Plans for the Minnesota Valley National Wildlife Refuge and appreciate the opportunity to review them.

Our only comment is that the plans, especially the Hunting Plan, appear to be realistic and workmanlike approaches to managing a very difficult area. We can imagine the spectrum of interests who have represented their points of view and believe you have synthesized a fair and innovative program to provide a wide range of recreational opportunities in the area for which you hold responsibility.

Stay with it and continue your good communications.

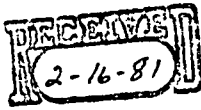
Sincerely,



Jack Mauritz
Senior Park Planner

JM/dlmp

Copy: ARW-PL
2-4-81



Paul Schneider
Assistant Refuge Manager
Minnesota Valley National Wildlife Refuge
4101 E 73th St
Bloomington, Mn

Re: Proposed trapping regulations

Sir:

I had the opportunity to review the above documents and would like to submit some comments.

The first issue I would like to address is the emphasis placed in your proposed regulations on the humaneness of trapping. It seems to me that some of the statements contained in the documents editorialize the emotions of anti-trapping interests. The statements I refer to are as follows:

"There is also a need to inform prospective trappers that leg-hold traps are cruel and cause suffering."

"We recognize that animals do have feelings and that leg-hold traps are cruel!"

Why do statements such as these appear at all? Nature itself is probably the most cruel of all forces when it comes to animal life. The deaths that result from starvation, disease, and lack of habitat due to animal overpopulation are certainly as cruel as any that are inflicted on the animals by trappers. However you make statements that establish the trapper as a cruel and heartless person.

If you must include statements concerning cruelty and suffering, then I suppose we should expect future regulations on killing of insects within the refuge because certainly the people so concerned about animal treatment are just as interested in the welfare of all animals (insects included) as they are about the cute furry ones. Not to be so concerned seems to me to be hypocritical. In summary I feel that the emotions of the anti-trapping movement should not enter into the regulations at all. As you say on page 13, "The morality of trapping is a personal issue."

The second issue I would like to comment on is the proposed method of allocating the permits. The basic system seems to make sense, however I do have concern on a couple of items. 1. What is to prevent anti-trapping individuals from applying for and being selected for a permit and then not using it? Given only a limited number of permits, this would prevent active trappers from obtaining a permit, and also result in under harvest of the game populations. I feel a method must be established to make certain the permits go to bonafide trappers. 2. Why the two year limitation for the lifetime of an individual trapper? Given the limited number of active trappers in close proximity to this area, it is probable that within a few years there would not be enough trappers to fill the available permits. Of course this would certainly please the anti-trapping people. Instead I suggest the restriction be that no one individual may have a permit in more than two out of any five consecutive years.

Thank you for allowing me to express my concern to the proposed regulations.

Sincerely,

Paul W. Schneider 522 Michigan St. Duran, Ia 52113

copy: PL 81

February 13, 1981

228 West 5th Ave.
Shakopee, Mn. 55379

Mr. Ed Crozier, Refuge Manager
Minnesota Valley National Wildlife Refuge
4101 East 78th St.
Bloomington, Mn. 55420

Dear Ed:

Thank you for sending copies of the second draft of the proposed hunting and trapping plan for the refuge. I have read the plans and I am very encouraged by the response to the public input that is evident in the second draft. You and your staff should be commended for your patience as I know you ended up as the middle men between many opposing views. Compromises that have developed seem to me to be reasonable under the circumstances. I feel I am losing some rights or freedoms I previously had but I am quite sure some people with other interests feel the same way. I think that is evidence of a true compromise.

There are a few points I would like to comment on and/or have clarified. In section I of the trapper plan "Purpose and Need for Action", third paragraph the first sentence says: "There is also a need to inform prospective trappers that leg-hold traps are cruel and cause suffering." This is stated here as a fact when actually it is the opinion of some anti-trapping groups. I think it would be better stated that leg-hold traps CAN be cruel and CAN cause suffering if improperly used. A similar sentence appears on page 7 in the last paragraph that could be corrected in the same way.

My next comment concerns three sentences that I would like to look at in total. The first one appears in the fourth paragraph of page 6, the other two appear in the fourth paragraph of page 8. "Muskrat sets must be drowning sets. Land sets and sets near and in creeks would tend to capture many non-target animals in an urban setting. Use of kill traps would be unacceptable for the same reason." As these are written I would interpret them to mean there will be no trapping in creeks, no use of killer traps, and no use of stop-loss traps where making drowning sets would be difficult.

If there is to be no trapping along creeks then you might as well not have trapping in Louisville Swamp as Sand Creek flows right through the middle of it. You don't see many houses along the creek because the muskrats live mostly in the banks. I can assure you there is a very good population of muskrats along the creek. This area should be open for trapping.

The small size killer traps commonly referred to as the 110 is, in my opinion, the most effective and humane trap there is for muskrats. This trap, when set in water, will not take non-target animals, except an occasional mink, as it is too small for coon or beaver or dogs and cats to get into. It is also a very effective trap to use under the ice. Without this trap, a trapper would be severely limited after there is ice.

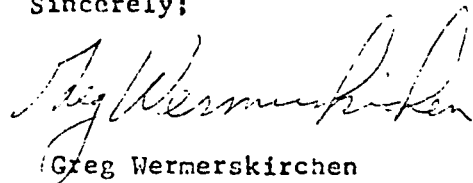
On any trapline there are many good sets that do not lend themselves very well to drowning type construction. An experienced trapper will use a stop-loss trap in these situations. This trap is a leg-hold type with an additional spring loaded arm similar to a mouse trap. When the arm is released it either kills the muskrat on impact or holds him down preventing him from

twisting around in the trap and sometimes drowning him in the shallow water.

In the Hunting Plan it is not clear to me if waterfowl hunting will be allowed in the Louisville Swamp area. I don't hunt waterfowl anymore but when I was younger, that area provided me with some very memorable hunts. I think the area would be a natural for a quality hunt as many of the ponds are a considerable distance from the present accesses which would naturally limit the number of hunters wishing to use the area. It is away from roads and houses and gives a true wild setting. The many small ponds in and around the swamp could provide several isolated blinds for a real quality hunt including a good hike in and out.

There are a number of other points I could discuss but in the interest of compromise I am going to let it rest here on what I have said. Again, I want to thank you and your staff for listening and reacting to the public input. If I can be of assistance in any way in aiding the development of the refuge I would be very pleased to do so. Just give me a call.

Sincerely;



Greg Wermerskirchen

2/19/81

Dear Sirs -

I looked through your folder in the Burnside Library yesterday. The one a beautiful proposal for the refuge for this year.

I'm afraid that the changes maybe in favor of those against hunting and trapping.

If hunting and trapping would be banned on the refuge that would be like passing an ordinance against it.

There was so much material in the folder that should not have been there. Someone must have put it there without the library knowing it. There is a magazine in there by FATE on how trapping causes pain and suffering for the animals. On how the

regarding the animals. There are many articles and pictures on how bad hunting & trapping is for the animals.

There's a letter by some one who likes to take his family outdoors but hates to be disturbed by shots and snowmobiles. Now we must keep them out, too.

There is a mailing list in there that had one "anti" on it. I recognized his name.

Your proposals for the refuge is lost in all this other material. Take a look at it.

Thank you very much.

Paul R. Nielsen
2109 Manor Dr.
Burnsville, Minn.
55337

FATE

2-25-81

FRIENDS OF ANIMALS AND THEIR ENVIRONMENT

P.O. BOX 7283, MPLS., MN. 55407

February 21, 1981

Mr. Edward Crozier
Refuge Manager
U. S. Fish and Wildlife Service
Minnesota Valley National Wildlife Refuge
4101 E. 78th St.
Bloomington, MN. 55420

Dear Mr. Crozier,

On behalf of Friends of Animals and Their Environment (FATE), I would like to comment on the draft trapping plan for the MVNWR. FATE is a Minnesota organization concerned with the protection of wildlife. Thank you for the opportunity to express our views on this plan.

At the outset, I want to make clear that FATE opposes commercial trapping on MVNWR or any other Refuge, unless such trapping demonstratively benefits the particular wildlife population. Pelt trapping runs counter to the concept of a refuge in our view, and the National Wildlife Refuge System was not established with trapping as a prescribed activity. Concerning the educational benefits of a trapping program, the Service should be in the business of teaching people about wildlife, not how to kill wildlife.

If trapping is to be allowed, however, the proposed trapping plan is a good one. Several features of the plan are noteworthy:

- Trapping is restricted to muskrats and to nuisance control.
- A mandatory course, including a presentation by those concerned about trapping, will be required of all trappers.
- The draft recognizes cruelty as an important social concern.
- Steel-jaw traps will not be allowed on land because of their cruelty and non-selectivity.

Copy ALW-PL
2-25-81

WE NEED A BOUNDLESS ETHICS WHICH WILL INCLUDE ANIMALS ALSO. Albert Schweitzer

- Strict regulations on the amount of trapping proposed, as well as tagging to determine numbers taken.

FATE offers the following suggestions:

- FATE is not an 'anti-trapping' organization as stated on page 13. We are working, however, to make this activity meet conservation, humane, and public interest needs.
- Use of one-way slide locks should be required for all drowning sets (page 6). These devices shorten the amount of time required for muskrats to drown.
- The feasibility of river otter reintroduction should be thoroughly explored. This native mammal, once fairly common on the Minnesota River, was extirpated by trapping. Otters have recently been reintroduced by the Department of Natural Resources to the Lac Qui Parle Wildlife Management Area. Muskrat trapping should not be allowed to interfere with the chances of success of such a reintroduction.

As a final comment, I want to thank you and the other Refuge staff for meeting with myself and others on this matter. Your sensitivity to our concerns is both refreshing and appreciated.

Sincerely,

Robert Waligora
Issues Coordinator

1034 Cleveland Avenue South • St. Paul, Minnesota 55116 • (A.C. 612) 690-0599

[illegible]

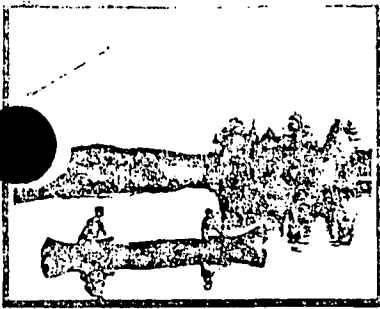
Dear Mr. Schneider,

In your draft proposal for public hunting on the Minnesota Valley Refuge, dated January 1981, I was pleased to note that there is provision for public hunting and that programs which support hunter-education are stressed. Since this area is adjacent to a large urban population and the Minnesota Valley Wildlife Refuge could not possibly support a hunting opportunity for every person in the Metropolitan area that liked to hunt, it appears to be a valuable and useful policy to support both youth and adult hunter education programs as persons who have benefited by this educational experience should be able to relate to the problems of hunting in a fairly constrained area and offer better cooperation with the Refuge personnel and with other hunters utilizing the same area.

Sincerely,

rely,
H. C. Price

Hugh C. Price
Vice President



2-25-81

MINNESOTA CONSERVATION FEDERATION

PUBLISHERS OF "MINNESOTA OUT-OF-DOORS"

1034
ROOM 218C 790 CLEVELAND AVENUE SOUTH • ST. PAUL, MINNESOTA 55116
PHONE [612] 690-3077

February 24, 1981

Mr. Paul Schneider, Assistant Refuge Manager
Minnesota Valley National Wildlife Refuge
4101 E. 78th St.
Bloomington, Minnesota 55420

Dear Mr. Schneider:

The following are comments on your Draft Trapping Plan dated January, 1981 for the Minnesota Valley National Wildlife Refuge.

In general the plan is degrading to the trapper and is a vendetta against trapping. It is dominated by anti-trapping interests.

Specifically our comments follow:

Page 1, paragraph 3 states, "There is also a need to inform the prospective trapper that leg-hold traps are cruel and cause suffering". Strong arguments can be made that trapping is no more cruel than the cruel natural death the animal will suffer if it isn't trapped. This sentence serves no purpose except to inflame uninformed people about the nature of trapping.

Page 1, paragraph 3, second sentence states, "A trapper education program will help trappers see both sides of the trapping issue". If this is true then we should also institute an anti-trapper education program to help them also see, "both sides of the issue".

Page 5, second paragraph under C states, "---and to give an opportunity to the anti-trapping interests to discuss their position". We are amazed at the lengths this document goes to to inject the anti-trapper position into the plan. Everyone has had ample opportunity to provide input into the plan. The document now wants the anti-trapper to have additional input after the decisions have been made. Incredible.

Page 7, second paragraph under B. Again the anti-trapping sentiment is encouraged. There is a perfectly valid reason why MDNR did not a

AFFILIATED WITH THE NATIONAL WILDLIFE FEDERATION

LEONARD D. HOCKERT
President
Minneapolis, Minnesota

KEN HIEMENZ
First Vice President
St. Joseph, Minnesota

KEN BONNEMA
Second Vice President
Redwood Falls, Minnesota

JOHN OELKERS
Secretary
Red Wing, Minnesota

JEFF COLE
Treasurer
Red Wing, Minnesota

MS
30 FILED-PL
2-25-81

Page 2

"block of anti-trapping sentiment". That's because it doesn't belong there.

We could cite a few more examples but the above should suffice.

We ask that you eliminate every part of the draft that is either anti or pro trapping and we ask that you eliminate special opportunities for any group to provide their particular brand of morality to the decision making or educational process.

Sincerely,

Al Farnes

Al Farnes,
Member of the Executive Committee
Minnesota Conservation Federation

AF/cr

cc. Len Hockert, President MCF
MCF Executive Committee.

Defenders OF WILDLIFE

March 1, 1981

Manager	SL
Admin. /Tech.	X
Const. /Maint.	
Public Use	
Wildlife	B

Edward S. Crozier
Refuge Manager
Minnesota Valley National Wildlife Refuge
4101 E. 78th St.
Bloomington, MN 55420

Dear Mr. Crozier,

We appreciate the opportunity to submit comments on the Draft Trapping Plan for the Minnesota Valley National Wildlife Refuge in Bloomington, MN.

Defenders has had a long standing interest and concern for Refuge management. You may be aware that our Executive Vice President, John W. Grandy, was a member of the Wildlife Refuge Task Force that in April 1979 submitted the report of recommendations on management of the National Wildlife Refuge System. Defenders believes that activities should not be allowed on NWR's unless they are beneficial to wildlife, or at the very least, demonstrably neutral in their effect. Further, we believe that the proponents of such activities on Refuges should have the burden of proving that the activities meet the above standards before the activities are allowed. We believe that activities such as hunting and trapping are unjustified on the basis of wildlife benefits and therefore degrade Refuges and violate the public's sense of what a true refuge for wildlife is.

However, we are aware that the USF&WS does not agree with our position and instead finds hunting and trapping to be consistent with good Refuge management. Therefore, we find the Draft Plan as presented to be well within the USF&WS guidelines for Refuge management. We strongly support the objectives of the Refuge as laid out in PL 94-466 to preserve the wildlife habitat and to provide opportunities for the study and enjoyment of wildlife in its natural habitat thru the establishment of a wildlife interpretation and education center.

If the recommended alternative of Muskrat and Nuisance Animal Trapping is adopted and the above goals are to be met, we feel strongly that this should be a true educational program. Clearly, the Trapper Education Course developed by the Minnesota Department of Natural Resources and the Minnesota Trappers' Association is a biased presentation favoring trapping. Since the Refuge and the resident wildlife belongs to all citizens, we believe that the non-trappers have the right to expect that the trappers who will benefit from the trapping program be exposed to another viewpoint and thus receive a true educational experience. We would be pleased to cooperate in whatever manner necessary to develop such an orientation program.

We commend you for your willingness to meet with us and discuss this plan. It is this type of spontaneous effort by the USF&WS that is much appreciated by the general public and does much to create understanding between your agency and the interest groups.

Sincerely yours,

Harriet Lykken
Harriet Lykken

Field Representative, Great Lakes Region
4600 Emerson Av. S. Mpls. MN 55409

1244 NINETEENTH STREET, NW • WASHINGTON, DC 20036 • (202) 659-9510



Minnesota Waterfowl Association, INC.

P.O. Box 346 Minneapolis, Minnesota 55440 (612) 379-1654

March 2, 1981

Edward S. Crozier, Refuge Manager
Minnesota Valley National Wildlife Refuge
4101 East 78th Street
Bloomington, MN 55420

Dear Ed:

I have only a few comments on the Draft Trapping Plan (dated January, 1981) for the Minnesota Valley National Wildlife Refuge.

On page 1, paragraph 3, the first sentence, "There is also a need to inform prospective trappers that leg-hold traps are cruel and cause suffering" is very misleading. Leg-hold traps are not necessarily cruel, although they may have the potential for being so. I suggest your staff refer to the Final Environmental Statement - Operation of the National Wildlife Refuge System, page III - 31, paragraph 2, for a more plausible description of trapping.

In the same paragraph, and also on page 2, paragraph 4; page 5, paragraph 3; page 7, paragraph 5; and page 13, paragraph 3, references are made to a proposed education program for trappers. The program would include presentations by anti-trapping groups. Quite frankly, this proposal illustrates either complete ignorance of or intentional disregard for the basic concepts of recreation education and the purposes of the national wildlife refuge system.

Developing education programs in conjunction with providing recreational opportunities is an admirable goal. The educational component, when properly developed, will increase the refuge user's appreciation of the natural resources of the

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3-6-81

Edward S. Crozier, Refuge Manager
Page 2
March 2, 1981

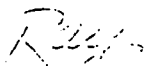
refuge and help mitigate any adverse impacts of the recreational use. I fail to see how exposing potential trappers to the philosophy of groups whose stated goals are not in line with the objectives of the National Wildlife Refuge System will benefit the refuge, the resource, or the recreational user.

In fact, providing a platform for the espousing of any private group's philosophy concerning our wildlife resources sets a dangerous precedent and clearly runs counter to the stated objectives of the refuge system (Final Environmental Statement - Operation of the National Wildlife System, page I - 15).

The Minnesota Waterfowl Association is very interested in coordinating our efforts in education and habitat restoration with the National Wildlife Refuge System where such coordination furthers the objectives of the refuge system. We do not presume, however, that the promotion of our philosophy should be forced on any user of the refuge. Nor should any other group. To allow otherwise compromises the integrity of the entire National Wildlife Refuge System.

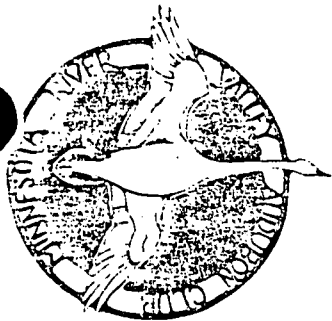
Thank you for this opportunity to comment on the draft plan.

Sincerely, for the resource,



Ray Norrgard
Executive Director

RAN:mcv



MINNESOTA RIVER VALLEY AUDUBON CLUB
Box 20400, Bloomington, Minnesota 55420

Manager	26
Admin./Tech.	
Const./Maint	
Public Use	
Wildlife	✓

March 11, 1981

Mr. John Tietz
Head, Planning Team - Mn. Valley
National Wildlife Refuge and
Recreation Area
Region 3, U.S. Fish and Wildlife Service
Federal Building, Fort Snelling
Minneapolis, Minnesota 55111

and

Mr. Otto Christianson
State Trail Planning
State of Minnesota
Department of Natural Resources
Centennial Office Building
St. Paul, Mn. 55155

Subject: Review and Comment on the Revised Hunting and Trapping Plans for
the Minnesota Valley National Wildlife Refuge and Recreation area.

The Minnesota River Valley Audubon Club (MRVAC) previously reviewed the initial
Hunting and Trapping plans and comments were included in a January 19, 1981
letter to the U.S. Fish and Wildlife Service (US FWS) and the Minnesota
Department of Natural Resources (MN DNR). Since revisions have been made in these
documents, we would like to provide additional comments and recommendations.

In our letter of January 19, we stated our position on this issue:

"It is recommended that hunting and trapping should be used as a
management tool only and limited to that which is necessary to
protect the habitat in the refuge. Consequently, it should be
limited to resident furbearers such as deer and rabbits. We feel
that hunting of migratory waterfowl is not necessary for habitat
management and doesn't fit the purpose of the refuge. Any hunting
and trapping activity must respect existing local city ordinances.
Because this project was funded from Federal Land and Water Conservation
funds, emphasis should be on environmental education."

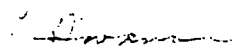
Although we feel very strongly that hunting and trapping should be limited to habitat management, we also acknowledge that this is a very sensitive issue and that much support for hunting and trapping activity has been generated by the public (especially in the more rural western portion of the refuge/recreation area). Consequently, we feel constrained to provide additional comment. Although the current draft revisions are more conservative (appropriately) than the plans initially proposed, we would like to present the following recommendations and comments:

1. Hunting and Trapping Education We would support hunting and trapping education (for all ages) prior to issuance of a permit.
2. Steel Shot Steel shot has been proposed for waterfowl hunting, and we would like to see this same policy extended to upland game as well.
3. Uniform Policies We urge the MN DNR and other agencies/municipalities to coordinate their management practices and permit issuance with the US FWS to provide uniformity and to minimize confusion to the public (including hunting, fishing, trapping, camping, etc.).
4. Refuge Area Expansion To provide optimal management efficiency and consistency of policies and procedures, we recommend transfer of jurisdiction to the US FWS, wherever feasible.
5. Enforcement of Regulations Since enforcement of hunting, trapping and other regulations is essential (with potentially significant risk to the officer), we feel strongly that an adequate enough staff be provided to allow a minimum of two conservation officers on patrolling assignments. (Consideration should also be provided for an equestrian patrol.) We would like to commend the US FWS for their effective monitoring of illegal activities in the river valley and would urge all other agencies/municipalities to work with the US FWS to achieve a safer area for all users of the river valley.
6. Initiation and Review We would like to recommend that hunting and trapping activities be initiated on an incremental basis, starting with a small well controlled area. This could provide ample opportunity for careful review of the impact on the area. We would also like to propose that as the area surrounding the refuge/recreation area becomes more intensely urbanized, consideration be given to phasing out public hunting and trapping activities.

The foregoing comments and recommendations have been endorsed by the Board of Directors of the MRVAC. We would like to reiterate that we have not changed our position as originally stated. We have only sought to provide input should hunting and trapping be implemented. We consider the revised plans to be a more reasonable approach and support the strengthening of controls apparent in this revision. We appreciate the more conservative approach of this revision, as safety for all trail users throughout the year (including the hunting season) is a concern.

This was a genuinely difficult issue for us to address, and we most sincerely appreciated the responsiveness of the refuge manager and his staff in openly and thoughtfully discussing the concepts of the hunting and trapping plans with us. These are very sensitive issues and consequently evoke a broad spectrum of public sentiment. We commend the planning team for their courage in inviting public comment on these issues; we truly value having the opportunity to respond.

Sincerely,


Clarence Swanson, President
Minnesota River Valley Audubon Club

copies:

George Bekeris, Area Manager
U.S. Fish and Wildlife Service
Twin Cities Area Office
530 Federal Bldg. & U.S. Courthouse
316 North Robert Street
St. Paul, Mn. 55101

Harvey K. Nelson, Regional Director
Region III, U.S. Fish and Wildlife Service
Federal Building, Fort Snelling
Twin Cities, Mn. 55111

Edward Crozier, Refuge Manager
Minnesota Valley National Wildlife Refuge
and Recreation Area
4101 East 78th Street
Bloomington, Mn. 55420

Roger Holmes
Chief, Section of Wildlife
Mn. Department of Natural Resources
Box 7
Centennial Building
St. Paul, Mn. 55155



STATE OF
MINNESOTA
DEPARTMENT OF NATURAL RESOURCES

March 9, 1981

Mr. Paul Schneider, Assistant Refuge Manager
Minnesota Valley National Wildlife Refuge
4101 East 78th Street
Bloomington, MN. 55420

Dear Mr. Schneider:

As we discussed at our meeting on Friday, February 27, 1981, I am offering the following comments concerning the draft trapping plan for the Minnesota Valley National Wildlife Refuge. I have opt to put my comments in writing, rather than on the draft, because of space limitations.

Page one.

Paragraph one. If healthy populations of muskrat, mink, beaver, and raccoon exist on the refuge, then a trapping season should be provided.

Paragraph two. Should be rewritten in a positive manner.

Paragraph three. Who says leg-hold traps are cruel and cause suffering? Most natural deaths are also slow and painful. Before the anti trapping faction is allowed to present their emotional side of trapping, they should be educated as to the benefits derived by both human and wildlife populations from trapping.

Page two.

Paragraph four. Every year there are surplus animals in most furbearer populations. I would expect that a harvest by trapping or hunting is an accepted management practice.

Page four'.

Paragraph two-A. No action or no trapping-would be acceptable only in areas where there is no outside influence.

Paragraph three-B. Open to all trapping - would be acceptable if the number of trappers are limited.

cont'd.

Page five.

Paragraph one. Harvest is regulated by a number factors, economic and environmental. However, habitat condition regulate the size and health of a population.

Our experience at the Carlos Avery Wildlife Management Area has been that a high capture rate of non-target animals does not occur.

This alternative would not have an effect on "sound" resource management since State laws would be in effect.

Paragraph two-C. Muskrat and nuisance animal trapping - trapping program should involve all furbearers in the Minnesota Valley.

Paragraph three. There is already some anti-trapping discussion in the trapping classes which point out that the anti's emotional approach is not environmentally sound.

Does the Refuge belong to the Fish & Wildlife Service and anti-trapping organization, or does it belong to everyone? (The word our.)

Page six.

Paragraph one. Adequate harvests to prevent disease will not be accomplished with twenty-four traps. Recommend no limit on the number of traps, especially if specific areas are to be assigned to each trapper. Also suggest that trap tags not be used.

Paragraph two. Should use thirty-six hour trap check regulation. Trappers would still have to check traps every day.

Paragraph three. Restrictive regulations should be used only in areas where local ordinance prohibits trapping. Also, the last sentence should read setting traps inside muskrat houses or feeders.

Paragraph four. Dogs and cats do not have a place in the Refuge except for those dogs used for hunting, and should any dog be caught the hunter can remove the animal with little or no problem or damage.

Should also allow the use of small (5½ x 5½) killer traps as dry sets and larger killer traps in water.

Page seven.

Paragraph one. How many years will a trapper be ineligible?

Paragraph two. There are many other benefits derived from harvesting surplus animals and should be mentioned.

Paragraph three. Does the Fish & Wildlife Service feel leg-hold traps are cruel? Do you really think a anti-trapping sentiment has a place in the trapper education course? This whole paragraph should be eliminated.

Page eight.

Paragraph three. Stay away from inference that people are dishonest.

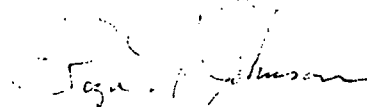
Paragraph four. How do you know there will be a lot of non-traget animals caught? Population size (numbers) will be a function of habitat conditions, not harvest.

Page thirteen.

Paragraph two. Most deaths are painful, you should be concerned with the quality of life rather than the quality of death.

In conclusion, I would like to say I agree that education of trappers, young and old, to proper trapping techniques, and wildlife management principles will foster a better understanding and appreciation of our wildlife resource. I think in a plan such as this, you have an excellent opportunity to express the legitimacy of trapping and to explain why it is desirable for other than recreation experiences. I would hope in future drafts a positive attitude would prevail.

Sincerely,



Roger N. Johnson,
Regional Wildlife Supervisor
Carlos Avery Game Farm
Forest Lake, MN. 55025
Phone 464-5200

RNJ:to

cc: Roger Holmes
Dick Toltzman
Karen Loechler
Edward Crosier

The third draft was prepared in consultation with personnel of the USFWS Twin Cities Area Office and submitted in July 1981.

The primary comments on the second draft were objections to statements on cruelty to animals. These statements were therefore clarified to conform to FWS policies. Pro-trapping interests in general felt the plan to be too restrictive.

On the other hand, many individuals and groups expressed the feelings that trapping was an inappropriate activity on this refuge. This final plan may not please anyone on the radical ends of the interest spectrum, but it does appear satisfactory to the majority of the public. Implementation of this plan is not expected before Fall 1982 because of incomplete land acquisition.

SIGNATURE PAGE

Submitted by:

Edward S. Crozier

Edward S. Crozier
Refuge Manager

7-10-81
Date

Approved:

[Signature]
Area Manager, TCAO

10-13-81
Date

James C. Lutman
Regional Director

NOV 9 1981
Date

LITERATURE CITED

Wingren, M.D. 1979. Emergent vegetation consumed by muskrats of the Minnesota River Valley: a semi-quantitative analysis. Rept. to the U. S. Fish and Wildlife Service. 54 pp.

U.S. FISH AND WILDLIFE SERVICE
REFUGE MANUAL

DRAFT

POPULATIONS MANAGEMENT

8 RM 17 (Exhibit 1)

Form 3-1726, Refuge Trapping Permit



UNITED STATES DEPARTMENT OF THE INTERIOR
U.S. Fish and Wildlife Service

National Wildlife Refuge

TRAPPING PERMIT

PERMITTEE - Name, address and phone no. Trapping License No: _____ State: _____ PARTNER, - Name, address, phone no. PARENT or GUARDIAN (Circle One)		Permit number																			
		Date issued																			
		Area or unit where trapping is permitted																			
		Period of use From _____ 19____ Through _____ 19____																			
		Payment received (if applicable):																			
		Tags (if applicable): <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <th style="width:50%;">No. issued</th> <th style="width:50%;">Serial numbers</th> </tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> </table>		No. issued	Serial numbers																
No. issued	Serial numbers																				
Trapping License No: _____ State: _____ FILL OUT ALL APPLICABLE SECTIONS																					
Species authorized (all others prohibited)	Quota	Season	<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <th colspan="2">Division of Pelts</th> </tr> <tr> <th style="width:50%;">Permittee</th> <th style="width:50%;">Government</th> </tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> </table>	Division of Pelts		Permittee	Government														
Division of Pelts																					
Permittee	Government																				

NOTE: THE TRAPPING CONDITIONS SUPPLIED HERewith ARE PART OF THIS PERMIT
 This permit is issued by the U.S. Fish and Wildlife Service and accepted by the undersigned, subject to the terms, obligations, and provisions expressed or implied herein and to the trapping conditions supplied herewith.

Permittee's Signature	Date	Issuing Officer's Signature	
Partner (Parent or Guardian) Signature	Date	Title	Date
Assistant(s) _____			

Form 3-1726, a Special Use Permit for trapping
March 1980

Release:

NATIONAL WILDLIFE REFUGE SYSTEM

REFUGE MANUAL

POPULATIONS MANAGEMENT

8 RM 17 (Exhibit 1)

Form 3-1726, Refuge Trapping Permit - Reverse Side

Page 2

Pursuant to the Code of Federal Regulations, Title 50, Section 31.16, the following conditions apply to the trapping of furbearing animals on National Wildlife Refuges.

1. State and Federal requirements. Trapping will be done in compliance with State game laws and regulations, and may be further restricted by general and special conditions of the refuge Trapping Permit. Permittees will also comply with all other regulations and conditions affecting access and use of the National Wildlife Refuge.

2. Trapping permits - Any person exercising the privilege of trapping furbearing animals within National Wildlife Refuge boundaries must possess a valid State trapping license and a Refuge Trapping Permit issued by the refuge manager. Trappers will carry such State trapping license and refuge trapping permit while trapping, and, when requested to do so, will exhibit them to any Federal or State agent authorized to enforce the game and fish laws of the State and of the United States. Permits are not transferable.

The refuge manager may at any time, before or during the trapping season, halt or limit trapping on the refuge or any portion thereof. Conditions of the permit may be modified as needed. Any changes will be made by an addendum (signed by both the issuing officer and the permittee) which should be attached to, and becomes a part of, the permit.

3. Approved traps, trap inspection and removal - Furbearing animals authorized to be taken on the refuge may be taken only by methods approved by the refuge manager.

Trap types, sizes, sets, baits, scents and locations will be selected to minimize the taking of non-target species.

All leghold traps with jaw spread greater than 5 1/2 inches will be of the "off-set-jaw" type (jaws with an opening of not less than 3/16" when closed). Steel leghold traps having teeth, spiked, or serrated jaws, whether attached or as part of the trap, are prohibited. Conibear traps size 110 or larger are prohibited for land use. Use in water sets for beaver or otter is acceptable.

In order to reduce the accidental trapping of birds of prey, the use of sight-exposed bait is prohibited. Sight-exposed bait means any visible animal part or facsimile thereof (excluding dry skeletal items from which the skin, hair, feathers and flesh have been removed) used to visually attract an animal to a trap or traps.

The possession or use within the boundaries of the refuge of any trap or captive device that does not comply with State and refuge requirements is prohibited. Any such illegal traps or devices found on the refuge may be seized and retained by the refuge manager.

Permittees are required to visit and inspect each trap set at least once every 24 hours, unless specifically waived by the refuge manager.

Inspection shall occur between one-half hour before sunrise and one-half hour after sunset, unless otherwise specified by State or refuge permit provisions. At the close of the trapping season the permittee shall remove all traps and equipment from the refuge. This will be done within a time frame designated by the refuge manager.

4. Use of vegetation - The permittee may cut on the refuge for use in trap sets only such species and amounts of brush or timber as the refuge manager shall designate.

5. Tending another person's traps - No person may attend another person's traps or trap line unless specifically authorized by the refuge manager.

6. Non-target species - Every effort will be made to prevent the capture of nontarget species. However, if an unauthorized animal is found alive and in satisfactory condition in a trap, it shall be immediately released. Animals found dead or seriously injured in the traps shall be disposed of as designated by the refuge manager.

7. Reports - Permittees shall submit a report (or reports) of traptake, of both target and non-target species, as required by refuge special conditions. The capture of all non-target species, regardless of condition, will be reported. (The permittee will not be prosecuted for reporting accidental take). Trappers should also promptly report the presence of diseased animals to the refuge manager.

If refuge trapping conditions permit the mailing of trap-take reports, such reports must be sent by certified mail with the permittee retaining the signed receipt as proof of submission.

8. Penalties - Failure of a permittee to comply with any of the trapping provisions or with any applicable Federal or State law or regulation may be sufficient cause for refusal of future permits to trap on the refuge or for refusal of any other use or privilege on the refuge for which a permit may be required.

The permit may be revoked or suspended by the issuing officer for just cause, such as violation, non-compliance with permit conditions, or nonuse (Title 50 CFR 25.43).

Permittees who wish to appeal adverse decisions should follow the appeals procedures designated in Title 50 CFR section 25.44 as amended (42 FR64120, December 22, 1977).

9. Damages - The United States shall not be responsible for any loss or damage to property, including but not limited to, animals and equipment; for injury to the permittee, partner(s) or assistant(s); or for damages or interference caused by wildlife or employees or representatives of the government carrying out their official responsibilities.

U.S. FISH AND WILDLIFE SERVICE
REFUGE MANUAL

DRAFT

POPULATIONS MANAGEMENT

8 RM 17 (Exhibit 2)

Form 3-2001, Application for Refuge Fur Trapping Permit



DEPARTMENT OF THE INTERIOR
U.S. FISH AND WILDLIFE SERVICE



APPLICATION FOR REFUGE FUR TRAPPING PERMIT

Notice:

In accordance with the Privacy Act of 1974, 5 U.S.C. 552a, please be advised that:

1. The permitting of trapping on lands of the National Wildlife Refuge System is authorized by the National Wildlife Refuge System Administration Act (16 U.S.C. 668dd-66eee) and the Refuge Recreation Act, 16 U.S.C. 460k-3; implemented by regulations in 43 CFR 24.3 and 50 CFR 31.15.
2. The application form will be used by Service personnel to evaluate the qualifications and conclude the eligibility of each applicant.
3. Routine use disclosures may also be made (1) to the U.S. Department of Justice when related to litigation or anticipated litigation; (2) of information indicating a violation or potential violation of a statute, regulation, rule, order or license, to appropriate Federal, State, local or foreign agencies responsible for investigating or prosecuting the violation or for enforcing or implementing the statute, rule, regulation, order or license; (3) from the record of an individual in response to an inquiry from a Congressional office made at the request of that individual (42 FR 19083; April 11, 1977).
4. The information requested in this application form is purely voluntary, but failure to answer questions may jeopardize the eligibility of individuals to receive permits.

Refuge name, address and telephone number:

TO BE COMPLETED BY APPLICANT

NAME _____ AGE _____

*Applicant must have obtained the age of majority in the State in which trapping will occur.

ADDRESS: STREET/BOX _____ CITY _____

STATE _____ ZIP CODE _____ TELEPHONE _____

NAME OF PARTNER _____

(Note: Partnerships must be authorized by the Refuge Manager, and each partner must complete an application.)

THIS SECTION APPLIES ONLY TO CERTAIN REFUGES REQUIRING FINANCIAL COMMITMENT OR REMITTANCE AT THE TIME OF APPLICATION

- A. Indicate amount of bid or fee for each unit or area you wish to trap. (Note: There may be restrictions on the number of units an individual may trap. Certain units may also have special restrictions. See special conditions.)

unit/area	bid/fee	unit/area	bid/fee	unit/area	bid/fee
_____	\$ _____	_____	\$ _____	_____	\$ _____
_____	\$ _____	_____	\$ _____	_____	\$ _____
_____	\$ _____	_____	\$ _____	_____	\$ _____
_____	\$ _____	_____	\$ _____	_____	\$ _____

- B. My deposit or payment of \$ _____ is enclosed. (Payment shall be by cashier's check, or bank or postal money order payable to "U.S. Fish and Wildlife Service." If you do not qualify or are not selected, payment will be returned.)

Form 3-2001
Date 1978

Form Approved OMB No. 042-R1523

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NATIONAL WILDLIFE REFUGE SYSTEM

U.S. FISH AND WILDLIFE SERVICE
REFUGE MANUAL

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POPULATIONS MANAGEMENT

8 RM 17 (Exhibit 2)

Form 3-2001, Appl. for Refuge Fur Trapping Permit - Reverse Side

Page 2

TO BE COMPLETED BY APPLICANT

Previous trapping experience:

- A. Species, and estimated number of each, trapped previously (average per year for most recent 5 years of trapping, e.g. muskrat-200, fox-25, etc.): _____
- B. Trap system (trap types and sets etc.) used previously: _____
- C. Location(s) (county and State) and dates of previous trapping experience: _____
- D. Please list one person (not related to you and other than your partner) who has knowledge of your trapping experience and qualifications. (Include name, address, and telephone number). _____

If you have a current State trapping license for the State(s) in which refuge trapping will be done, please provide license number(s). (Give State and number.)

Note: A State license will be required prior to issuance of permit.

Do you have, or can you obtain, the necessary equipment specified in the special refuge trapping conditions? _____

Have you participated in any class or other trapper orientation or training program?

_____ If so, give date and location. _____

If selected, are you willing to attend such a program if required? _____

I certify that I have read and understand the general and specific conditions and regulations contained in the trapping permit and supplied herewith, and agree to abide by these provisions. I certify that all of the statements made in this application are true, complete and correct to the best of my knowledge and belief, and are made in good faith. I understand I may be disqualified if any information on this application is found to be false.

Signature of Applicant _____ Date _____

Form 3-2001
Date 1978

To Be Completed by Refuge Manager:

QUALIFIED	UNQUALIFIED*	DATE & INITIALS
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*Reasons for rating to be attached

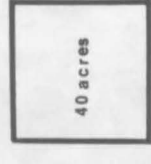
Release:

NATIONAL WILDLIFE REFUGE SYSTEM

Figure 2.c



CHASKA LAKE and LOUISVILLE SWAMP UNITS



MINNESOTA VALLEY
NATIONAL WILDLIFE REFUGE
U.S. FISH AND WILDLIFE SERVICE
DEPARTMENT OF THE INTERIOR





MINNESOTA VALLEY
NATIONAL WILDLIFE REFUGE
 U.S. FISH AND WILDLIFE SERVICE
 DEPARTMENT OF THE INTERIOR



Minnesota Valley
 National Wildlife Refuge
 4101 East 78th Street
 Bloomington, MN 55420



LONG MEADOW LAKE UNIT
BLACK DOG LAKE UNIT

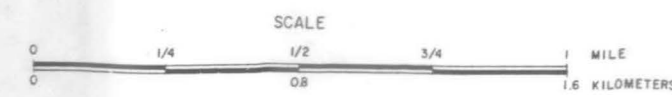
Figure 2.6.



MINNESOTA VALLEY

NATIONAL WILDLIFE REFUGE

U.S. FISH AND WILDLIFE SERVICE
DEPARTMENT OF THE INTERIOR



UPGRALA UNIT