



**THE HUMANE SOCIETY  
OF THE UNITED STATES**

April 10, 2024

Vermont House Environment and Energy Committee

RE: Support for S. 258

Dear Chair Sheldon and members of the committee,

On behalf of the Humane Society of the United States and our members and supporters in Vermont, I respectfully urge you to pass S. 258. This important bill would diversify membership on the Fish and Wildlife Board ("Board"), which has been long overdue, and would also prohibit the hounding of coyotes and hunting coyotes over bait.

Currently, although the Board is responsible for setting policy on wildlife management, there is no requirement for members to have even a fundamental knowledge in areas such as wildlife biology, biodiversity, ecosystems, and conservation science. Under S. 258, members will receive training from the Vermont Fish and Wildlife Department on "wildlife biology, coexistence with wildlife, ethics, the reduction of conflict between humans and wildlife, and the impacts of climate change on fish and wildlife."

Including a requirement for both consumptive users and non-consumptive users (i.e. those who do not hunt or trap, such as wildlife watchers and hikers) to sit on the Fish and Wildlife Board is another much-needed step towards creating an accurate representation of the public. Historically, members of the Board who are hunters or trappers have been responsible for creating policy that govern their own activities, and have lacked diversity in multiple areas, failing to adequately represent the wide range of interests and values held by Vermont residents.

For example, in 2023, less than 10% of Vermont residents held a paid hunting license, and despite the overall population increasing, the number of paid license holders has decreased by an astonishing 55% in the last 50 years.<sup>1</sup> Yet every current member of the Board either hunts, fishes, and/or traps. The wildlife of Vermont is held in the public trust, to be managed for the benefit of all residents—not just the small percentage who seek to kill them.

It's only right that non-consumptive users – whose numbers continue to grow – get a seat at the table as well. According to the U.S. Fish and Wildlife Service, wildlife watchers and those who participate in non-consumptive outdoor recreation now outnumber and outspend hunters and trappers by a wide margin.<sup>2</sup>

Additionally, tourists in Vermont spend millions of dollars in local economies to view wildlife and enjoy outdoor spaces. The National Park Service reports, "In 2022, 64.0 thousand park visitors spent an estimated \$4.2 million in local gateway regions while visiting National Park Service lands in Vermont. These expenditures supported a total of 54 jobs, \$1.9 million in labor income, \$3.2 million in value added, and \$5.6 million in economic output in the Vermont economy."<sup>3</sup>

And according to the Bureau of Economic Analysis in the U.S. Dept. of Commerce, outdoor recreation in Vermont generated nearly \$1.9 billion for the state's economy in 2022. Of that figure, hunting and

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<sup>1</sup> [https://us-east-1.quicksight.aws.amazon.com/sn/accounts/329180516311/dashboards/48b2aa9c-43a9-4ea6-887e-5465bd70140b?directory\\_alias=tracs-quicksight](https://us-east-1.quicksight.aws.amazon.com/sn/accounts/329180516311/dashboards/48b2aa9c-43a9-4ea6-887e-5465bd70140b?directory_alias=tracs-quicksight)

<sup>2</sup> The U.S. Fish & Wildlife Service: 2022 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation at <https://digitalmedia.fws.gov/digital/collection/document/id/2321/rec/1>

<sup>3</sup> National Park Service, "2022 National Park Service Visitor Spending Effects Report," <https://www.nps.gov/subjects/socialscience/vse.htm>

trapping generated only 0.43%. Participants in snow activities spent more than 30 times that much, and people spent more than 109 times as much on travel and tourism in Vermont (Fig. 1).<sup>4</sup>

Fig. 1

Outdoor recreation spending in Vermont (2022) From: U.S. Bureau of Economic Analysis		
Sample outdoor activities	Spending [in thousands of dollars]	% of total
Hunting and trapping	7,942	0.43
RVing	109,462	5.9
Snow activities	243,933	13
Travel and tourism	871,857	46.9
<b>Total outdoor recreation</b>	<b>1,859,515</b>	<b>100.00</b>

In addition to the welcome changes S. 258 brings to the Board, it would also prohibit the cruel and unnecessary activity of coyote hounding and shooting coyotes over bait. Hounding, which is the use of packs of dogs to find and pursue coyotes and other wildlife, is considered unsporting even among many hunters because it gives unfair advantage to the hunter.<sup>5</sup> Hounders may attach GPS collars to their dogs, who then run miles ahead and are not under control by their owners. While pursuing coyotes and other target species, hounds chase, startle, panic and kill non-target wildlife, including deer.<sup>6</sup> They may even chase coyotes into roadways, where oncoming vehicles could strike either. And hounds invariably trespass on lands—whether on private land or on special refuges such as national parks where hounds are not permitted. This creates strife between landowners and hunters.<sup>7</sup> If the hounding is conducted in the late winter or spring, dependent coyote pups may be orphaned and left to die of starvation or exposure, or may be killed by other carnivores.

Equally troubling is the practice of baiting, which offers hunters even more of an unfair advantage. Bait sites concentrate wildlife of different species and thus increase the potential for disease and parasite

<sup>4</sup> Dept. of Commerce, Bureau of Economic Analysis: Outdoor Recreation Satellite Account, U.S. and States, 2022 at <https://www.bea.gov/data/special-topics/outdoor-recreation>.

<sup>5</sup> C.W. Ryan, J.W. Edwards, and M.D. Duda, "West Virginia Residents: Attitudes and Opinions toward American Black Bear Hunting," *Ursus* 2 (2009); T. L. Teel, R. S. Krannich, and R. H. Schmidt, "Utah Stakeholders' Attitudes toward Selected Cougar and Black Bear Management Practices," *Wildlife Society Bulletin* 30, no. 1 (2002).

<sup>6</sup> Hristienko and McDonald, "Going in the 21st Century: A Perspective on Trends and Controversies in the Management of the Black Bear." Stefano Grignolio et al., "Effects of Hunting with Hounds on a Non-Target Species Living on the Edge of a Protected Area," *Biological Conservation* 144, no. 1 (2011). Emiliano Mori, "Porcupines in the Landscape of Fear: Effect of Hunting with Dogs on the Behaviour of a Non-Target Species," *Mammal Research* 62, no. 3 (2017).

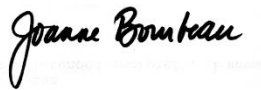
<sup>7</sup> Hristienko and McDonald, "Going in the 21st Century: A Perspective on Trends and Controversies in the Management of the Black Bear."

transmission between species, including mange.<sup>8</sup> Baiting is destructive to wild places, as bait sites require ease of access and biologists have noted habitat destruction at these places, including the spread of invasive plants.<sup>9</sup> Bait piles are also smelly and irritating to other outdoor recreationists, and if they are near roadways, can endanger coyotes who travel near or on roadways to access bait piles.<sup>10</sup> Members of the coyote hounding working group that was formed last year in response to Act 165 agreed to prohibit the baiting of coyotes for training purposes, but with no explanation, Vermont Fish and Wildlife ultimately removed that provision from its final proposal.

Act 165 also mandated that the Department pass rules that support "...the management of the [coyote] population in concert with sound ecological principles." But Vermont Fish and Wildlife has, to date, not provided any science-based evidence that their proposed rules comport with that directive. In fact, the practices of hounding and baiting are antithetical to sound ecological principles.<sup>11</sup>

For these reasons we respectfully urge you to pass S.258 to align the membership of our Fish and Wildlife Board more accurately with Vermont's residents and values, and to spare coyotes the cruelty associated with hounding and baiting.

Sincerely,



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<sup>8</sup> L. Dunkley and M.R.L. Cattet, "A comprehensive review of the ecological and human social effects of artificial feeding and baiting of wildlife," *Canadian Cooperative Wildlife Health Centre - Dept. of Veterinary Pathology, Saskatoon, Saskatchewan*, , no. <http://digitalcommons.unl.edu/cgi/viewcontent.cgi?article=1020&context=icwdmccwhcnews> (2003); Inslerman et al., "Baiting and Supplemental Feeding of Game Wildlife Species," *The Wildlife Society*; Amanda Sommerer, "A spatial analysis of the relationship between the occurrence of mange in Pennsylvania's black bear population and impervious land cover" (Masters of Science Indiana University of Pennsylvania, 2014), [http://search.proquest.com/openview/5f410b3a59f3b507ef1dbe0af7be77e8/1?pq-origsite=gscholar&cbl=18750&diss=y\(1562957](http://search.proquest.com/openview/5f410b3a59f3b507ef1dbe0af7be77e8/1?pq-origsite=gscholar&cbl=18750&diss=y(1562957)); Rebecca Kirby, David M. Macfarland, and Jonathan N. Pauli, "Consumption of intentional food subsidies by a hunted carnivore," *The Journal of Wildlife Management* 81, no. 7 (2017), <https://doi.org/doi:10.1002/jwmg.21304>, <https://onlinelibrary.wiley.com/doi/abs/10.1002/jwmg.21304>.

<sup>9</sup> Hank Hristienko and Jr. McDonald, John E., "Going in the 21st Century: A Perspective on Trends and Controversies in the Management of the Black Bear " *Ursus* 18, no. 1 (2007).

<sup>10</sup> Remington J. Moll et al., "An apex carnivore's life history mediates a predator cascade," *Oecologia* 196, no. 1 (2021).

<sup>11</sup> *Supra* notes 2 and 3.