

Testimony: In Support of S.258

Sarah Gorsline, Vermont Representative, Project Coyote

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IN SUPPORT OF S.258, A CRITICAL WILDLIFE BILL

Good afternoon, my name is Sarah Gorsline, I live in Grand Isle County. Thank you to Representative Sheldon and the Committee for the opportunity to testify today, on behalf of myself as a Vermonter, Project Coyote, who I represent in Vermont, and our Vermont constituents. We stand in strong support of S.258, a critical wildlife bill that arrives at this nexus in time of mass species extinction, a biodiversity crisis, and climate crises.

[Project Coyote](#) is a national, science-based nonprofit whose mission is to protect North America's wild carnivores and promote compassionate coexistence through education, science, advocacy, and coalition building. We support the right of all Vermonters to hunt for food in a fair chase, humane and ethical manner.

We do not support the hunting or trapping of Vermont's wild carnivores: bear, coyote, wolves, bobcat, and fisher, because science shows us that these species are key ecosystem regulators, and are essential for ecosystem health.

Scientific studies also show that wild carnivore populations are generally self-regulating, so their removal through hunting is not necessary to control their numbers. As Vermont Fish & Wildlife's Eastern Coyote info sheet, available on their website, states, "Coyotes can increase their reproductive rates in response to hunting, so populations rebound quickly from efforts to control their numbers directly by hunting or trapping."

Today, I'd like to speak about why S.258 is an exciting bill for Vermont's wildlife and ecosystems, and why S.258 is an example of democratic compromise that is needed to bridge these increasingly divisive times. S.258 would position Vermont as a leader in science-based wildlife management in the United States. This bill

would modernize wildlife policy, democratize the process of creating wildlife rules, and would support healthier Vermont ecosystems, which benefit us all.

S.258 IS A COMPROMISE, AND HAS BEEN ADJUSTED TO COMPROMISE BETWEEN DIFFERENT VIEWPOINTS

Wildlife in Vermont are protected under the Public Trust Doctrine which means that wildlife belongs to *all* Vermonters and the Department and Board of Fish & Wildlife have a legal duty to protect wildlife, for the benefit of all Vermonters and future generations. Wild animals are essential to the functioning of natural ecosystems, which in turn provide all of us with free services that we depend upon for our survival, for example clean air and water, pollination, crops, medicines, healthy soils, waste processing, a more stable climate, etc. Therefore the Board has a duty to protect wildlife for the benefit of us all.

What S.258 proposes is to diversify the viewpoints and experience of the Board, to be more reflective of the broad public of Vermont and not just consumptive user groups. In addition the bill would add qualifications for those serving on the Board which are imperative to provide for informed wildlife policy making.

The Board as it stands now consists of Vermonters appointed by Governor Scott who are generally all hunting license-holders or former license-holders, and who approach wildlife regulations as a way to support the harvest or consumptive use of wildlife. While the regulations this Board makes affect hunting, fishing and trapping, they also affect much broader issues such as: ecosystem health into the future, populations of wildlife within ecosystems, public safety for all Vermonters who use wild spaces for recreation and enjoyment, and residents' rights on private and public lands.

Many folks I've spoken with, who engage in hunting, trapping, fishing and hound hunting, and who currently benefit from the Board's wildlife regulations, are satisfied with the current Board and how it serves the needs of hunters. However, this Board should not only serve the fraction of Vermonters who participate in consumptive use of wildlife but rather ALL Vermonters. Why should those who hunt, trap, fish and hound hunt, be the sole regulators of wildlife? When I've talked with someone who advocates for various forms of hunting in

Vermont, they suggested that only those who hunt, trap and fish have the unique expertise needed to regulate wildlife policy related to game animals. I would argue the opposite, that allowing those who engage in regulated activities to regulate said activities actually creates a conflict of interest. Regardless of this difference of opinion, I do value the perspectives, insights and observations of hunters and anglers, and therefore I think they should have a place at the table to help regulate wildlife, however, they should be required to share the table with the majority of Vermonters who value wildlife alive. I also believe that many hunters care deeply about ecosystem health, after all, the ecosystem is what sustains the game species they hunt. However, hunters, trappers, anglers and hound hunters should not solely dominate wildlife rulemaking, as the current Board appointment system allows for.

What the Board as it currently stands does **not** include are:

–A diversity of viewpoints as to how wildlife and ecosystems should be managed

–Board members with a minimum training in biology, conservation, hunting ethics, coexistence with wildlife, and changes to ecosystems due to climate change.

–A Board composition that reflects that the substantial majority of Vermonters do not hunt at this time in history, and that Vermonters who are not hunting license-holders also care about ecosystems and wildlife, and would like to be able to provide input on how wildlife are managed.

–An understanding of the impacts of certain policies that this Board has enacted on fellow Vermonters, for example hound hunting and use of bait to hunt coyotes. During extensive testimony before the Senate Committee on Natural Resources and Energy, we heard examples of residents and landowners who are negatively impacted by coyote hound hunting. Due to the nature of coyote hound hunting—packs of hunting hounds in pursuit of prey often out of sight from their accompanying handler—this activity will continue to cause conflicts and violate landowner rights in a state that is growing in number of residents, and where recreational use of wild spaces is rapidly overtaking hunting practices in these spaces.

I understand, and the coalition of wildlife advocates I work with understand, that compromise is necessary to enact bills that bridge the differing viewpoints of all Vermonters. As a wildlife advocate, I fully support that “the ideal” should not be the enemy of “good enough,” and that legislators have to find a balance between strongly opposing ideas of how to proceed with wildlife policy in this state. With this understanding, S.258 has changed significantly since it was introduced, due to compromises requested by various legislators and the Department. The bill has shifted from where it began: proposing a balanced representation of hunting license-holders to non-license holders on an advisory-only Board, with equal Board appointments made by 3 separate government entities, to where S.258 stands now: with 14 county-based individuals who will continue to be appointed by the Governor, with 2 seats appointed by the Legislature. What I do want to highlight as essential is that going forward there will be qualifications for Board member appointments, and also required training for Board members in conservation, hunting ethics, coexistence with wildlife and climate change science, so that the people engaged in wildlife rulemaking have all of the best possible science and information available to them.

COYOTE HOUND HUNTING AND USE OF BAIT

S.258 also bans coyote hound hunting and the use of bait to hunt coyotes, two practices that show why broader viewpoints are needed on the Board to make regulations that affect public safety and coexistence between different activities that take place in wild spaces. At Project Coyote, scientific studies show us that coyote hound hunting serves no legitimate purpose in modern conservation of wildlife, and it creates the conditions for conflict between packs of hunting hounds, livestock, pets, and other Vermonters who share the landscape in increasing numbers. In recent years there have been numerous incidents of hunting hounds trespassing on posted land, or harassing Vermonters and livestock on private property or on shared public land.

Many hunters and wildlife advocates consider hound hunting a violation of “fair chase” principles of hunting. Hound hunting can involve hounds in direct conflict with the wild animal, hounds mauling live wildlife, and hounds getting injured by wildlife. There is no reason why hounds should be put in the position of being mauled by a wild animal.

Studies suggest that wildlife managers should evaluate the effect of hunting dogs on non-target species, especially in areas with the presence of endangered and protected species which are likely to be negatively affected by hunting dog presence. In Vermont, hounds may be illegally harassing federally and state protected species such as transient wolves and lynx.^{1, 2}

The Commissioner of Fish & Wildlife mentioned in his testimony that there have been no coyote hound hunting conflicts with Vermont residents since the new hound hunting rules took effect in January. I'd argue that 2-3 months (from January-March 2024) is not a sufficient time frame to test whether hound hunters are following the recent rules created by the Board, and whether those rules actually prevent conflicts as the Board claims they do.

Use of bait to attract any wildlife species increases human-wildlife conflicts because bait draws animals out of wild spaces and closer to homesteads and communities. Bait also creates the conditions for collateral damage. In the years 2022-2023 there were 3 known incidents of domestic dogs being shot by hunters over bait piles, in Tunbridge ([see article](#)), Barre and Dummerston ([see article](#)). Not just wild animals are attracted to bait, creating the conditions for tragic mistakes. Bait also has the potential to spread disease in wildlife populations, with the potential for diseases to spread beyond wildlife to humans or livestock. I've included a scientific study as a handout that speaks to this aspect of bait use.³

“WILDLIFE IS ABUNDANT AND FLOURISHING”

¹ Mori, E. 2017. Porcupines in the landscape of fear: Effect of hunting with dogs on the behavior of a non-target species. *Mammal Research* 62:251-258; Grignolio, S., E. Merli, P. Bongio, S. Ciuti, and M. Apollonio. 2011. Effects of Hunting with Hounds on a Non-Target Species Living on the Edge of a Protected Area. *Biological Conservation* 144:641-649; Sforzi A. & Lovari S. 2000. Some effects of hunting on wild mammalian populations. *Ibex J. MT. Ecol.* (Hunting dogs have been proven to negatively effect the behavior of non-target species including displacement, temporary abandonment or substantial increase of home ranges, alteration of activity rhythms, significant temporal or spatial change in habitat use, and increased hormone secretions.)

² [Grignolio et al. Unknown_Effects of hunting with hounds on a non-target species](#)

³ [Sorensen, Beest, Brook 2013_Impacts of wildlife baiting and supplemental feeding on infectious disease transmission risk](#)

We often hear from opponents of S.258 that wildlife species the Board regulates are “abundant and flourishing,” for example coyotes, therefore there are no changes needed to wildlife policy or oversight. First, this idea contains a huge assumption about human rights to wildlife and ecosystems: that if the numbers are good, hunters have the right and ecological incentive to take as many of these abundant animals as they like. However, the Department’s fixation on wildlife populations as the only metric of wildlife health is another example of catering only to consumptive user groups’ interests. Wildlife health can also be measured by metrics including robust scientific literature showing how indiscriminate and widespread killing of carnivore species like coyotes can negatively impact surviving coyotes’ physiology and behavior which build up to negative impacts on coyote dynamics including wellbeing, fitness and ecological relationships. All of these metrics of health are ignored when wildlife managers focus solely on populations. Furthermore, this ignores the precautionary principle, that we should approach environmental regulations with caution given our limited and emerging understanding of the complexity of ecosystems, and the increasingly fragile state of the planet.

Second, the statement that wildlife species are “abundant and flourishing” requires that the Board and Department have an accurate understanding of species populations, numbers which are currently based on reporting by hunters within 30 days of close of that season. There’s currently no reporting required for canids (that includes coyote, fox and wolves) killed through general hunting. For hound hunted and trapped coyotes there is now reporting required. No reporting is required for gray fox, red fox, and other furbearer species under general hunting. Trapping of these species requires reporting within 30 days after the close of the season, but there is currently no penalty for those trappers who don’t return their annual surveys. I would argue that if we don’t have accurate numbers of species that exist, and info beyond those numbers, such as how healthy the population is, then we can’t actually say that populations of wildlife species are “abundant and flourishing.” The current year-round coyote hunting season, and limited reporting requirements, mean that there’s the potential for coyotes to be removed in excess from Vermont ecosystems.

As I mentioned before, scientific studies also show that wild carnivore populations are generally self-regulating, so their removal through hunting is not necessary to control their numbers. Studies indicate that removal of coyotes can

actually lead to an increase in their numbers^{4,5} due to increased litter size under pressured conditions, and due to juvenile coyotes, upon disruption of their social structure, dispersing out of their known territory and finding new mates to reproduce. Scientific studies show that juvenile predators who are orphaned tend to predate on farmers' livestock more than predators in areas where the population is not regularly removed.

COYOTES, WILD CARNIVORES, AND HOW THEY BENEFIT VERMONT

Eastern coyote, Eastern wolves who have been found dispersing in the region, bear, fisher, bobcat, fox and lynx are critical [Ecosystem Allies \(short educational video\)](#) who help manage the health and wellbeing of Vermont ecosystems through what scientists call “trophic cascades.” Trophic cascades are powerful indirect interactions that can regulate entire ecosystems, and occur when top predators limit the density and/or behavior of their prey. These animals all have a purpose within ecosystems, whether keeping them in balance, dispersing seeds in their scat, or reducing rodent populations which in turn controls the prevalence of diseases such as Lyme disease.⁶

Here in Vermont, where Eastern coyotes are the primary apex predator, coyote removal can precipitate an ecological chain reaction that leads to degradation of the health, integrity and diversity of our ecosystems.⁷ By allowing the indiscriminate killing of predator species such as coyotes, this removal may set off a cascade of negative environmental consequences. At this time of mass species extinction, we should be strictly scrutinizing policies which allow the indiscriminate killing of carnivores and other ecologically valuable wildlife.

WHY BOARD REFORM IS ESSENTIAL NOW

⁴ Project Coyote Science Advisory Board, 2020: [“Why Killing Coyotes Doesn’t Work”](#)

⁵ [Coyote Studies Summary, Robert Crabtree, Yellowstone Ecological Research Center, 5/17/2023](#)

⁶ Benson JF, Loveless KM, Rutledge LY, Patterson BR. Ungulate predation and ecological roles of wolves and coyotes in eastern North America. *Ecol Appl.* 2017 Apr;27(3):718-733. doi: 10.1002/eap.1499. Epub 2017 Mar 15. PMID: 28064464.

⁷ Benson JF, Loveless KM, Rutledge LY, Patterson BR. Ungulate predation and ecological roles of wolves and coyotes in eastern North America. *Ecol Appl.* 2017 Apr;27(3):718-733. doi: 10.1002/eap.1499. Epub 2017 Mar 15. PMID: 28064464.

Wildlife rules affect all Vermonters, and the wildlife they regulate. Managing wildlife as a shared resource is a huge responsibility, and those who make rules managing wildlife should have the training and information needed to make regulations that are in line with current ecosystem science. These rules should also take into account the nuances of “the precautionary principle”, that we should approach environmental regulations with caution given our limited and emerging understanding of the complexity of ecosystems. For example, over the past few decades, wolves have occasionally found their way into the Northeast, however, due to the similar appearance of wolves and large Eastern coyotes, and because of the year round coyote hunting season allowed by the Board and Department, these animals have been and will continue to be killed by hunters and trappers in Vermont. Wolves’ listed legal status as an endangered species prompts the need for specific on-the-ground actions. Hunters need to be informed about how to differentiate between Eastern coyotes and wolves, to prevent illegally killing species who are protected under the federal Endangered Species Act. Recommendations from the Northeast Wolf Recovery Alliance, a group of scientists and advocates including members from Project Coyote and Protect Our Wildlife, have not been taken up by the Board as requested, further emphasizing why Board reform and a diversification of stakeholders on the Board is necessary.

Thank you for this opportunity to testify today, and I’d be happy to answer any questions.

SARAH GORSLINE | PROJECT COYOTE MULTIMEDIA ASSOCIATE & VERMONT

STATE REPRESENTATIVE

Grand Isle County, Vermont | 802-378-5141

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