

Dear LCAR Chair Squirrel and LCAR committee members,

My name is Anne Jameson and I live in Marshfield. As Wildlife Advocacy Coordinator for Green Mountain Animal Defenders, I have followed the proceedings leading to the Act 159 (Best Management Practices (BMPs) for trapping and Act 165 (taking of coyotes with dogs) proposal by the Fish & Wildlife Department (FWD) from the beginning. In my opinion, these BMPs fail to meet the 2021 legislative mandate.

Specifically referencing LCAR Rule (7) “the environmental impact analysis fails to recognize a substantial environmental impact of the proposed rule”: I question why no mention is made of a larger-view environmental impact having been done is noted in the proposal being reviewed by LCAR, even ‘though this information may be found in the ICAR rules. Surely effects on environments and habitats in the state should be a significant factor in the ‘best management’ of species which live in those environments, and what overall, long-term impacts the implementation of those BMPs will have. This lack illustrates the criteria for committee rejection of the proposed BMPs under this Rule.

Beavers, for example, are a keystone species critical to the larger environment for their incredible ecosystem engineering feats. Their ponds and dams not only create and re-stabilize wetland habitat for themselves and other species such as otter, muskrat, moose, birds, fish and insects, but also provide a critical mitigating tool in times of flooding by pushing flood waters into the earth and helping it to spread out, thereby reducing the amount of damage further downstream. Even in the recent severe floods, unlike past years, towns such as Monkton, Shelburne and Essex suffered little to no damage after choosing to co-exist with the beavers and instead install ‘beaver baffles or deceivers’. An environmental impact study would show that, although the water itself isn’t affected by the trapping of beavers, its actions on other parts of the surroundings would be if not for the existence of these very important animals and the effects of their dams.

With regard to beaver, Section 4.17 of the FWD BMP proposal only offers trapping restrictions for the month of March. Further, during the rest of the regular season there is no bag limit! Why is the trapping and killing of them still allowed and condoned by the FWD when we need all our bio-diversity to help remedy our climate crisis? Beavers should be welcomed as valuable assistants in the battle to save our ecologies, not maligned as pests, then trapped and killed. Although the FWD website extols the benefits of these wetland builders and how the Department strives to encourage the use of beaver baffles, in reality their support of trapping, both by their own Department and various other state agencies offers a different picture.

Another example where a broader impact study should have been done is the practice of hunting coyotes with a pack of trained dogs. No mention is made of the value of or need for coyotes as apex predators in the ‘wider’ picture of our state environs. The FWD document only establishes processes and regulations by which coyote may be hunted with these dogs.

Having evolved from the smaller Western coyote and, probably, the somewhat larger Eastern/Ontario wolf, the Eastern coyote is very intelligent, and has become highly adaptable in its ability to live in colder climates, eat a more varied diet and live closer to humans. As a beneficial apex predator, coyotes control over-populations of smaller prey such as mice and rats which often carry pathogens such as Lyme disease, a serious, on-going threat to both humans and domestic animals in our state. They also help maintain a healthy deer population by occasional thinning of weaker animals.

Yet, coyotes may be hunted all through the deepest of winter, when food is scarcest, and with no limit on take, by a pack of dogs – a very un-sporting, unethical hunting method. An environmental impact study would take into consideration not only the long-term effects of a decreasing population of apex

predators on the larger habitat, and how that population may be adversely affected by the hunting with hounds, but would also evaluate the potential damage to lands and possibly domestic animals at all times of the year by this hunting with dogs. The need for a restricted coyote hunting season becomes even more critical with the increasing possibility of wolves, an endangered species, returning to Northeastern habitats. Procedures for counting coyote take, along with the creation and implementation of reporting procedures and data gathering for those who fall into pre-determined criteria as possible wolves, must be put into place.

As stated in a letter to the FWD sent June 28, 2023 by Joanne Bourbeau, Northeast Regional Director of the Humane Society of the United State (HSUS): “Act 165 directs the rules to support the management of the population in concert with sound ecological principles.” So far, the FWD hasn’t shown anything truly science-based in their proposal that satisfies that directive. Indeed, the hunting of coyotes with dogs is antithetical to any sound ecological practice.

Based on the grounds for rejection by this committee as stated in Rule (7), I firmly believe the FWD’s BMP proposal falls decidedly short of both Act 159 and Act 165 legislative mandates for its lack of attention to the overall, broader environmental impact of trapping and hounding. The proposal should, therefore, be rejected.

Thank you for considering my concerns.