

PROJECT COYOTE

F O S T E R I N G C O E X I S T E N C E



October 2, 2023

Honorable Trevor Squirrel, Chair
Legislative Committee on Administrative Rules (LCAR)
115 State Street
Montpelier, VT 05633

Dear LCAR Committee Members and Chairman Squirrel,

My name is Sarah Gorsline, I'm a Grand Isle County resident. I also represent the national, science-based nonprofit Project Coyote in Vermont. Project Coyote promotes nonlethal coexistence strategies with native carnivores, such as bears, coyotes, wolves, foxes and bobcats throughout the United States. Science informs us that native carnivores are keystone species who maintain healthy ecosystems here in Vermont, thereby regulating populations of herbivores, such as deer, and other smaller animals, like rodents, within that ecosystem. We do not oppose fair-chase hunting, or subsistence hunting. Instead we're opposed to specific hunting practices and methods, such as trapping, hound hunting, and wildlife killing contests, because these practices lack any science-based justification, lead to animal suffering, and are not embraced by the majority of citizens or hunters.

I appreciate the opportunity to share my concerns as a Vermonter, and Project Coyote's concerns, about Vermont Fish & Wildlife Board's proposed Rules and Regulation changes related to Act 159, "An act relating to the best management practices for trapping", and Act 165, "An act relating to hunting coyotes with dogs." The Board and Department's proposed Trapping Best Management Practices and Coyote Hunting Regulations Updates do not go nearly far enough to protect Vermont ecosystems, or to protect wildlife held in the public trust that the Board and Department manage for all Vermonters, including subsequent generations into the future.

Vermont Fish & Wildlife's ICAR report states "these trapping and hunting activities will have no impact on the healthy and abundant populations of furbearers in Vermont." However given that there are no bag limits (kill limits) on the number of coyotes killed throughout a year-round open coyote hunting season (including trapping, hound hunting and all other methods of hunting), and there is currently very limited reporting required for canids (coyote, fox, wolves) killed in Vermont, except voluntary reporting for animals over 50 pounds, Vermont Fish & Wildlife department has a limited understanding of how healthy furbearer populations actually are in Vermont.

Act 159 Legislative Mandate:

The new Trapping BMP rules proposed by Vermont Fish and Wildlife in no way fit the legislative mandate under Act 159 to “propose criteria and equipment designed to modernize trapping and improve the welfare of animals subject to trapping programs.” A few examples of why the rules can’t meet this mandate:

1) Simply put, there’s no way to make leg hold or body gripping traps humane for any animal, regardless of padding, size, type or placement. Trapping is a cruel and ineffective method of managing wildlife, and it doesn't reflect the instrumental value predators offer in their contributions to ecosystem health, rodent control, disease prevention and increased biodiversity of Vermont ecosystems. This is especially important to consider since 0.15% of the Vermont public participates in trapping.

2) No method of trapping can avoid the potential of capturing, with the risk of injuring or killing, non-target animals (including endangered species and domestic animals). In 2022 there were 13 reported pets injured or killed in Vermont traps, the total number injured or killed is unknown, since reporting is voluntary. Vermont Fish & Wildlife is still allowing kill traps on land which is a direct threat to non-targeted animals who cannot be safely released.

Act 165 Legislative Mandate

The Department and Board’s proposed coyote hound hunting rules in response to Act 165 in no way meet the Legislative mandate that reads, “the General Assembly intends that the rules required under this section support the humane taking of coyote, the management of the population in concert with sound ecological principles, and the development of reasonable and effective means of control.”

Examples of how the proposed rules do not fit the legislative mandate are:

1) Simply put, hound hunting will never be a humane way to hunt any animal. Many hunters and wildlife advocates consider hound hunting a violation of “fair chase” principles of hunting. Hounding involves hunters and guides using packs of powerful, GPS-collared hounds to pursue and harass wildlife until physical exhaustion. Hound hunting can involve hounds in direct conflict with the wild animal, hounds mauling live wildlife, and hounds getting injured by wildlife. There's a reason that dog fighting is illegal federally, there is no reason that dog fighting should be allowed in the woods because one of the dogs being mauled is a wild canid.

2) These proposed rules contradict the following legislative intent: “the management of the population in concert with sound ecological principles.” Coyotes, and other apex predators, are critical allies in maintaining Vermont ecosystems. Here in Vermont, where eastern coyotes are the primary apex predator due to the loss of historical apex

predators (eastern cougar and eastern wolf), coyote removal can precipitate an ecological chain reaction that leads to degradation of the health, integrity and diversity of our ecosystems.¹ 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 such as the proposed rules which allow the indiscriminate killing of carnivores and other ecologically valuable wildlife. We should be crafting policies to protect these species in the face of our current ecological crisis. One example of how Vermont Fish & Wildlife's current regulations don't fit this science, is that coyotes, a keystone species in Vermont, may be hunted year round, with no bag (kill number) limits, and no specific rules on how the animal may be killed.

3) The proposed rules totally lack "a reasonable and effective means of control" for hunting hounds. The Fish & Wildlife Department's own expert, who is a hound hunter himself, presented on GPS collars for dogs at the March 15th, 2023 Board meeting, noting that the collars stop working beyond a 1 mile range, or when the hounds go over any kind of topographic incline such as a rocky slope, of which there are many in VT. The idea of GPS collars, which are already in use by most hounders, as a control method for a pack of hunting hounds seems a nonstarter.

4) 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.²

5) Hounding is a cause of conflict and threat to public safety across Vermont with multiple reports of individuals and their dogs being attacked by hounds hunting coyotes³ and black bears⁴. Vermont landowners have reported hounds trespassing on

¹ 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.

² Mori, E. 2017. Porcupines in the landscape of fear: Effect of hunting with dogs on the behaviour of a non-target species. *Mammal Research* 62:251-258; Grignolio, S., E. Merli, P. Bonghi, 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.)

³ See: https://vtdigger.org/press_release/hunters-hounds-terrorize-vermont-resident-and-attack-her-dog/

⁴ See: <https://www.vpr.org/vpr-news/2019-11-26/hikers-attacked-by-bear-hunting-dogs-legislators-consider-changing-regulations>

their property, violating private property rights, and harassing them and their domestic animals.⁵

If the state is concerned about human-wildlife conflicts, and wildlife issues affecting Vermont farmers, then the Board and Department of Fish & Wildlife's own rules contradict these concerns. Indiscriminate and "pre-emptive" killing of predators associated with trapping, and hound hunting, can lead to the disruption of predators' social structure and foraging ecology in ways that increase the likelihood of predation on livestock and conflict with humans or pets. In hunted coyote populations, for example, the number of surviving pups that must be fed by the alpha parents and the number of transient individuals may increase. Coyote pups learn hunting behaviors and food habitats from their parents; therefore when trapping or hound hunting removes parents before they are able to teach their young, these factors predispose more coyotes to prey on livestock and increase the instances of conflict. Studies show that hunting-pressured coyote populations tend to be larger, not smaller, than populations with stable packs that are undisturbed.

In conclusion, I and my colleagues who are wildlife advocates, educators and scientists at Project Coyote urge you to reject Vermont Department of Fish & Wildlife's proposed Furbearer rules, which are unsupported by science or thorough studies on their environmental impact, and to push Vermont legislators on the House and Senate Environment and Energy Committees to follow science, and the values of Vermonters, to guide legislation on these issues. Before these committees' consideration are: H.191 a house bill to limit trapping, H.323, a house bill to ban the hound hunting of coyotes, and Senate Bill S.111 to limit trapping. We encourage legislators to move forward on these issues that are currently impacting Vermont ecosystems. Thank you for the opportunity to share these concerns with you.

Sincerely,

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⁵ See: https://www.reformer.com/opinion/letters/letter-hounding-violates-property-rights-imperils-domestic-animals-livestock/article_782344c4-6f58-11ec-8534-33fe4db321ce.html