



TESTIMONY IN SUPPORT OF [H.132](#):

Sarah Gorsline, Project Coyote Vermont Representative

2/19/25

Summary arguments:

- 1. Species who are currently hunted over bait in Vermont, including coyotes, foxes, bobcats and raccoons, are ecologically necessary, and serve an important role in ecosystems. These animals have self-limiting populations, and hunting is not necessary to manage their numbers. (Big picture)**
- 2. Baiting creates the conditions for human-wildlife conflicts, and predation of livestock and pets (public safety concern)**
- 3. Bait spreads wildlife diseases, including chronic wasting disease in ungulate populations, like deer (health concern)**
- 4. Baiting is not fair chase hunting (ethical concern)**

Hello, my name is Sarah Gorsline. Thank you to Representative Sheldon and this Committee for the opportunity to testify here today in support of [H.132](#). I'm a Grand Isle resident, and the Vermont representative for Project Coyote. I'm speaking today on behalf of my colleagues at [Project Coyote](#), and our Vermont constituents. Project Coyote is a science-based nonprofit, whose mission is to protect North America's wild carnivores and promote compassionate coexistence through education, science, advocacy, and coalition building. Our work is guided by a Science Advisory Board, including biologists, ecologists and wild carnivore experts from around the country.

OVERVIEW

Apex predators, which in Vermont include Eastern coyotes and dispersing Eastern wolves, black bears, fisher and bobcats, are critical ecosystem regulators and engineers, just like beavers and cougars, as this Committee heard in recent testimony. Apex predators regulate ecosystems through what are known as “trophic cascades,” which involves limiting populations of smaller mammals and ungulates in ecosystems through predation of those species (which protects plant species from being overeaten by herbivores, allowing native plants to flourish), dissemination of seeds that increase biodiversity in the case of bears and coyotes, and regulating mesopredator species like raccoons, foxes and skunks through predation, which improves songbird abundance and overall ecosystem diversity. So apex predators impact everything from how many rodents and plants are found in an ecosystem to bird and insect population diversity, and they can reduce diseases like Lyme disease which is carried by their prey.

At Project Coyote, we understand the right of fair chase hunters to hunt for subsistence, while we advocate against hunting of apex predators since their numbers do not need to be managed by hunting, and they play an important ecological role. I respect the role Vermont hunters play in regulating the deer herd in the absence of large historic apex predators like cougar and a healthy breeding population of Eastern wolves.

Unfortunately, dispersing Eastern wolves from Southern Canada are struggling to make a recovery in the Northeast due to the lack of coyote hunting regulations in Northeastern states, including Vermont. Eastern wolves and coyotes can have a similar appearance [please see the handout that’s being passed around], and can be confused by hunters in the field, thereby limiting the ability of Eastern wolves to gain a foothold in the Northeast. As Fish and Wildlife noted in the 2015 State Wildlife Action Plan, **“The ability of coyote hunters in the northeast to effectively discern wolves from coyotes in the field may also influence the likelihood of natural wolf recolonization....Thus, protection from hunting and trapping mortality may facilitate viable wolf populations in fragmented habitat with higher human population and road densities.”**¹ The current unregulated coyote hunting seasons in every Northeastern state except Massachusetts and New Jersey, which allow coyote hunting during pupping season, do not facilitate this ecologically beneficial recovery for Eastern wolves.

A note about wild carnivore populations: scientific studies reveal that predator species generally have self-regulating and stable populations that do not require management

¹ [2015 VT State Wildlife Action Plan](#)

by hunters.²³ Their stable populations are different from populations of herbivores, like deer, who are often overabundant in current times due to the absence of historic large predators like cougar, or a healthy breeding population of Eastern wolves. To be clear: hunting predator species is a choice made by wildlife regulators like the Board of Fish and Wildlife, but predator removal is not an ecological necessity.

Anecdotally, we may see coyotes, bobcats, raccoons and foxes throughout the state, and seeing these species around conveys a sense of abundance. It is a privilege of our relatively healthy ecosystems to witness these animals, but seeing them does not translate to accurate population counts, and is purely anecdotal information. Furthermore, coyotes, foxes and bobcats *may be* abundant in Vermont, but their populations adjust to available resources and conditions in their local areas, and to pressure from other predators. It's normal and healthy to witness these animals in rural places, and a testament to the intact nature of Vermont ecosystems. Abundance does not necessitate removal of wild carnivore species, and as such, harvesting ecosystem-critical species is a choice, not a necessity.

HUMAN-WILDLIFE CONFLICTS

Baiting of wildlife is an important issue for us at Project Coyote, for reasons which I'll lay out here. One of our primary missions at Project Coyote, a goal we share with legislators and Vermont Fish and Wildlife, is to help prevent human-wildlife conflicts by sharing strategic wildlife coexistence tools with legislators, communities, town officials, wildlife agencies, hunters and farmers, to prevent conditions that create wildlife conflicts.

Hunting of wildlife over bait is a public safety issue, because bait creates the conditions for human-wildlife conflicts, by drawing wildlife out of the wild, into human inhabited and cultivated spaces. Predators such as coyotes, bobcats, raccoons and foxes who use bait as a local food source can easily become habituated to human areas, returning frequently to the same location to take advantage of this resource. Studies indicate to us that predators habituated to human spaces tend to have more conflicts with humans, livestock and pets. Since bait may be found on or near properties that also house livestock, bait draws predators to that area, creating increased risk of livestock predation for farmers.

² [Coyote Studies Summary, Robert Crabtree, Yellowstone Ecological Research Center, 5/17/2023](#)

³ Project Coyote Science Advisory Board, 2020: ["Why Killing Coyotes Doesn't Work"](#)

Bait is also a neighborhood issue. If a bait pile is located on one property, wildlife species habituated to that bait can become problematic for neighboring residents who may have livestock or pets, or who simply do not want wildlife near their homes. One hunter's use of bait can impact the wider community, changing wildlife behavior and wariness.

A note about wariness: at Project Coyote we often hear the rationale that hunting wild carnivores like coyotes keeps them 'wary' of human spaces, thereby helping prevent future coyote visits. First, hunting a species can't teach that species, a dead coyote doesn't learn. As Vermont Fish and Wildlife states in their Eastern Coyote paper: **“Where significant reductions in coyote numbers are locally achieved, the missing animals are soon replaced with young coyotes moving in from other locations, so any local population reduction is only short-term.”**⁴

Bait creates incentives for new animals to move into an area, even when previous “problem animals” have been removed. Baiting of wildlife is the opposite of creating wildlife wariness, instead it habituates wildlife to a particular area, ensuring their return. Baiting is therefore counterproductive to the efforts of Fish and Wildlife and the hardworking game wardens who spend so much time trying to prevent human-wildlife conflicts, or wildlife conflicts with livestock, to protect farmer livelihoods.

A note about the species who are baited in Vermont and their unique diets: coyotes, raccoons and foxes particularly are opportunistic omnivores. This means that, similar to us humans, they eat many different things, including: rodents, fruit, eggs, vegetables, and insects. They also eat foraged carcasses and roadkill, helping to clean ecosystems in the process. Because these species are omnivores, they can also be drawn to bait used for herbivores, like corn used to attract deer and turkeys. For this reason, their diets connect them to disease concerns related to ungulates like deer and moose. If herbivores and carnivores are feeding from the same bait, diseases that affect both populations have the opportunity for transmission, among and between both populations.

WILDLIFE DISEASES

Hunting of wildlife over bait is also a disease vector concern. Baiting and supplemental feeding significantly increase the potential for both intra- and inter-species disease transmission. It's well documented in scientific literature that baiting can increase the

⁴ [Eastern Coyote-Vermont Fish & Wildlife Department](#)

risk of diseases such as **chronic wasting disease**,⁵ **brucellosis**, **tuberculosis**,^{6,7} and other diseases affecting ungulates, such as deer and moose. Scientific studies, including: a 2013 study by Sorenson, et al, a 2015 study by Nichols, et al, and a 2018 study by Cosgrove et al [[please see accompanying studies provided to this Committee](#)], show that bait can increase these diseases in herbivore populations.

As I've mentioned, herbivores may share bait with carnivores, increasing the risk of cross-species disease transmission. Bait creates artificial congregation points that can accelerate disease transmission through multiple pathways. A 2015 experimental feeding trial in collaboration with the USDA, for example, showed that when animals consume tissue infected with chronic wasting disease, they can temporarily shed infectious prions through their feces. This environmental contamination becomes concerning at bait sites, where both ungulates and fur-bearing species repeatedly visit the same concentrated areas. The wide-ranging movement patterns of various fur-bearing species (covering areas up to 16 square miles) means that diseases picked up at bait sites can then be dispersed across large geographic areas.⁸

Bait can also increase incidence of [mange](#), due to wildlife congregating closely in a specific area.⁹ Mange should be of concern to Vermont trappers, who may seek healthy animals if using the animals for food, fur or hide.

In a state where deer hunting is popular and widely embraced by the hunting community, and where venison serves as an important subsistence food, it's essential that legislators and Fish and Wildlife enact regulations that serve the overall health of the deer herd, and other ungulates like moose. It's ironic that some hunters claiming to be traditionalists defend baiting of wildlife, given that bait can create disease conditions that threaten other Vermont hunters' prey, such as herbivores.¹⁰

⁵ [CWD prions remain infectious after passage through the digestive system of coyotes](#)

⁶ [Baiting and Feeding Revisited: Modeling Factors Influencing Transmission of Tuberculosis Among Deer and to Cattle](#)

⁷ [Impacts of wildlife baiting and supplemental feeding on infectious disease transmission risk: A synthesis of knowledge](#)

⁸ [CWD prions remain infectious after passage through the digestive system of coyotes](#)

⁹ [The use of haystacks by wolves may facilitate the transmission of sarcoptic mange](#)

¹⁰ [CWD prions remain infectious after passage through the digestive system of coyotes](#)

There's also research from 2020 by Brookshire et al¹¹ on parasite transmission in mesocarnivores, such as raccoons, related to bait use. Raccoons are opportunistic omnivores, as mentioned, so they can share bait intended for carnivores or herbivores. Raccoons and skunks are sometimes prey for coyotes or other large carnivores, which, in addition to all of these species sharing food at bait sites, puts those larger mammals at risk of picking up parasites or other diseases.

CONCLUSION

Human actions impact ecosystems. Ecosystem health is intricately interconnected, and involves animals, insects, plants, water, the air and soil in a given location. Introducing bait into an ecosystem is an artificial condition, which creates public safety challenges and disease issues for wildlife. While bait may make hunting easier for some hunters, at Project Coyote we believe that easy hunting is not fair chase hunting.

The concept of fair chase originated with 19th-century conservationists like Theodore Roosevelt, who condemned unsporting practices such as hunting animals trapped in deep snow. Modern versions of unsporting tactics might be: night scopes, scent lures, or "whacking" in which wildlife are killed with vehicles or snowmobiles. These are all issues that Project Coyote works to combat as unsporting practices, with the foundational understanding of how important wild carnivore species are to ecosystems.

Modern interpretations of fair chase require hunters to pursue free-ranging wildlife without artificial advantages. Ethical hunters take pride in their skills and role as stewards of America's outdoor heritage. Wildlife baiting contradicts the principles of fair chase that generations of sportsmen have upheld. When animals are drawn to artificial food sources, it diminishes the authentic hunting experience - the skills of tracking, understanding animal behavior, and the chase.

Even more concerning, bait can be misused to lure game from public lands to private shooting operations. This practice undermines the tradition of equal access to wildlife, which belongs to all Vermonters. Baiting wildlife artificially moves animals into new locations, giving an unfair advantage to hunters who bait over other hunters or wildlife watchers. Just as sportsmen of the past fought to end overharvest of species and

¹¹ [Wildlife Baiting Is Associated with an Increased Parasite Intensity in Raccoons \(*Procyon lotor*\) in Mississippi, USA](#)

preserve hunting for future generations, today's hunters must protect fair chase principles and public access to ensure everyone has a genuine opportunity to experience the challenge and reward of ethical hunting.

Thank you for the opportunity to speak today on behalf of Project Coyote and our Vermont constituents in support of H.132, which we believe will improve public safety and prevent diseases among Vermont's wildlife populations.