

April 24, 2026

Dear Commissioner Batchelder, Members of the Fish and Wildlife Board, and Leadership Team,

The Starksboro Conservation Commission writes to express its strong opposition to the petition presented by the Vermont Bowhunters Association seeking to allow the hunting of black bears over bait in Vermont. We appreciate and support the Department's recent recommendations, as articulated by Biologist Jaclyn Comeau, advising against this practice. We urge the Board to follow the science and deny the petition.

Bear baiting is opposed by conservation biologists and ecologists across North America due to its harmful ecological and behavioral impacts. It disrupts natural foraging patterns, affects reproduction and population dynamics, increases human–bear conflicts, and contributes to degradation of forest and edge habitats. In addition, baiting contributes to the spread of serious diseases like sarcoptic mange and parasites when animals congregate at sites. Below, we summarize key findings from peer-reviewed studies that highlight the significant ecological, ethical, and management concerns associated with bear baiting.

1. Forest and Habitat Impacts

Manning, J.L. & Baltzer, L. (2011). Impacts of black bear baiting on Acadian forest dynamics – An indirect edge effect? *Forest Ecology and Management*, 838–844.

This study demonstrated that bear baiting sites create localized ecological disturbances, altering plant communities and forest regeneration. Baiting generates indirect edge effects that extend beyond the bait pile footprint.

Key findings:

- Reduced tree seedling regeneration and increased soil disturbance.
- Shifts toward disturbance-tolerant and invasive plant species.
- Chronic habitat alteration from repeated annual baiting.

Conclusion: Baiting sites create long-term forest disturbance patches that compromise ecosystem integrity.

2. Effects on Bear Diet and Behavior

Kirby, R., McFarland, D.M., & Pauli, J.N. (2017). Consumption of Intentional Food Subsidies by a Hunted Carnivore. *The Journal of Wildlife Management*, 81(7): 1161–1169.

This study analyzed tissue samples of black bears in northern Wisconsin to determine the extent of bait use in diets. It found that bait contributed over 40% of bears' fall caloric intake, indicating heavy reliance on artificial food sources.

Key findings:

- Predictable high-calorie subsidies concentrate bears, inflate local populations, and increase human conflict risks.
- High-energy diets alter natural foraging and reproductive patterns, especially in females whose fertility and fecundity rates increase when artificial food sources are available.
- Cubs conditioned to bait rather than learning to forage for natural foods are more likely to engage in human–bear conflicts.
- Baiting benefits numerous non-target species, further altering local ecosystems.
- Aggressive and dangerous territorial disputes can occur at bait sites when otherwise solitary bears fight over food resources.

Conclusion: Baiting fundamentally alters bear ecology—affecting behavior, space use, reproduction, and population dynamics—ultimately undermining any population management objectives.

3. Food Conditioning and Conflict Risk

Lafferty, D.J.R. et al. (2024). Bear baiting risks and mitigations: An assessment using expert opinion analyses. *PLoS ONE*, 19(11): e0312192.

This recent study synthesized decades of behavioral and ecological data using expert opinion analysis. It found broad consensus among bear biologists that baiting increases food-conditioning and conflict potential.

Key findings:

- Baiting is functionally equivalent to intentional feeding.
- Increases risk of food conditioning, particularly among cubs.
- Elevates likelihood of human–bear conflicts.
- Buffer or setback requirements are insufficient to mitigate risks.

Conclusion: Food-conditioned bears are more likely to require management intervention or removal. The study’s authors recommend prohibiting baiting and emphasize data-driven, ecosystem-based management.

4. Governance and Policy Considerations

Glitzenstein, E., & Fritschie, J. (1995). The Forest Service's Bait and Switch: A Case Study on Bear Baiting and the Service's Struggle to Adopt a Reasoned Policy on a Controversial Hunting Practice Within the National Forests. *Animal Law Review*, 47.

This policy analysis highlights how federal agencies, under pressure from hunting interests, failed to regulate bear baiting based on scientific and ethical principles.

Key points:

- Bear baiting contradicts mandates for ecosystem-based and science-driven wildlife management.
- Decision-making should prioritize ecological integrity, transparency, and fair-chase ethics.

- The authors call for a nationwide prohibition of baiting on public lands.

Conclusion: Management policies should rest on ecological science and public trust doctrines, not short-term hunting convenience.

Summary and Recommendations:

The evidence is clear that bear baiting undermines Vermont's goals of maintaining ecological balance, reducing conflict, and supporting ethical wildlife practices. Intentional food provisioning alters bear behavior, inflates local populations, and perpetuates problems Vermont has successfully managed to minimize through education and coexistence strategies.

The Department's approach to bear management should emphasize coexistence and long-term ecosystem resilience. To achieve this, Vermont should prioritize non-lethal, habitat-based management strategies that support natural bear behavior and maintain population balance. Equally important, stronger public education programs are needed to reduce attractants, minimize human–bear conflicts, and encourage responsible community practices.

Any policy changes under consideration should include a transparent, peer-reviewed environmental assessment that evaluates long-term impacts on forest ecology, wildlife populations, and public safety. This process should include input from conservation commissions, municipalities, and qualified scientists to ensure decisions are balanced, science-based, and publicly accountable.

Together, these measures will sustain both public safety and healthy bear populations across Vermont's forests and communities.

As the Starksboro Conservation Commission, we urge the Vermont Fish and Wildlife Board to reject the petition to allow bear baiting and to continue supporting science-based wildlife management that reflects Vermont's values of ecological integrity, fair chase, and respect for wild systems.

Thank you for your consideration.

Respectfully submitted,
The Starksboro Conservation Commission
Starksboro, Vermont

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