

Hello House Committee on Environment and Energy,  
Please see my feedback below on S258, previously sent to my local representatives. This is a fundamentally terrible bill that is bad for wildlife, and I urge you not to move this bill forward.

I am a longtime resident of Jericho Vt, and have been involved in conservation from both a non-hunting as well as a hunting and angling perspective for many years. Please know that even after all of the modifications to date—which are huge improvements—I remain strongly opposed to this bill because it is bad for wildlife, regardless of whether you are a hunter or angler, or not. The bill seeks to address a small number of exceptions to the overwhelmingly beneficial role that hunting, angling and trapping continue to play in overall conservation of both game and non-game species, through a total overhaul of the Fish and Wildlife board and the process we use to set regulations for hunting fishing and trapping. In the process it creates redundancy and inefficiency at the Fish and Wildlife department that will detract from their ability to carry out their mission; and it still needlessly adds politics to the regulation of hunting, fishing and trapping without any guarantee of making those regs more scientific and less political by virtue of seating all regulatory authority with one single political appointee.

I understand there is a dispute between the LCAR and the fish and wildlife board regarding the specific language of the trapping BMP's and the coyote hunting regulations adopted this past fall. My understanding is that a judge has ruled at least partly on this. I believe if clarification is needed on this point that it should be addressed through the Administrative Procedures Act, not by a total reorganization of the Fish and Wildlife Board. We should avoid throwing the baby out with the bathwater if indeed there is actually a problem here—having read the judges decision and the case, I remain unconvinced there is actually a problem that isnt already addressed through the existing language of the APA and the 2022-2023 bills in question (acts 159 and 165 I believe).

S258 removes the citizen panel from actually introducing or having direct influence on regulation except as it relates to oversight. If we took away our Senate's ability to introduce legislation and gave it to another body, you can bet they'd squawk loudly, and this is no different. While it sounds good to say that this means "science will be more front and center", what we've seen in other states where single political appointees carry out this duty is that there has been MORE political influence, not less. The citizen board already takes into account the advice of department biologists, but at least it is consensus-driven rather than putting ultimate authority in the hands of only one political appointee. With hunters, anglers and trappers footing almost two thirds of the departments funding via direct license sales as well as via federal Pittman-Robertson and Dingell-Johnson excise taxes on hunting, shooting and fishing equipment, this is a major stakeholder group in conservation that needs to be squarely addressed in setting regulations in addition to merely meeting legislative intent—and that's before we consider that these activities are specifically protected in our state constitution. If the

Legislature wants to add a couple of board members with "balanced perspectives" to this board (I still don't think it's at all clear what that means), OK, but it is not clear to me how placing the ultimate authority for proposing all regulations with the single politically-appointed agency-head is either 1) any better 2) any less prone to politics, or 3) any more free of being able to overrule department biologists, over whom that role has hiring and firing oversight. This is a dangerous way to consolidate "power" with only one individual, which will add MORE politics and LESS stability to a process that is already getting more and more politically contentious every day—depending on who is in that seat it could be bad news regardless of which side of this issue you land. This is neither wise nor is it more inclusive, and it sets our wildlife up to be a political football in the future. If you value wildlife, and if you see the setting of regulations for hunting fishing and trapping as important in that work, it's critical that we keep the regulatory authority dispersed via a board to prevent a consolidation of regulatory authority under only one political appointee.

I also fail to see why the new board under s258 needs to have its purview expanded to include so many aspects of the work of the Department of Fish and Wildlife, well-beyond the existing role of the Fish and Wildlife Board. The department has already testified to the fact that this board would be redundant with other boards they already work with, create additional layers of oversight and work for which they are not staffed, and would therefore require more personnel and time. Is the funding for this going to come at the expense of the Department's existing conservation work? Hunters and anglers already pay the majority share of the Department's non-game work, and have been advocating nationally for the Recovering America's Wildlife Act (RAWA), which would add funding for non-game work conducted by the States, which currently has no dedicated funding source. With more money available for this work, in a way that doesn't reduce hunting or angling-related opportunity and corresponding revenue, it should be a "tide that raises all boats". But with no funding provided in this bill, it's not at all clear how this unfunded mandate won't detract from the existing work the department is doing—which has been overwhelmingly positive for our wildlife populations and habitat. This makes no sense.

s258 also requires a non-game plan. A non-game management plan already exists, the Vermont Wildlife Action Plan, which is a comprehensive partner-driven blueprint for the conservation of species of greatest conservation need. This plan is one of the most comprehensive and progressive in the US and already incorporates public feedback, yet the bill calls for another plan without any statement of need. Why is this?

The bill in its current form bans coyote hunting with dogs altogether, before anyone has had a chance to see how the regulations put in place for the first time this season worked. A massive amount of time and energy went into working on this regulation by all involved, and this bill appears to be a retaliatory reaction to some people not getting what they wanted. In essence, this bill puts the entire North American Model of Conservation—wherein maximizing opportunity within a sustainable framework results

in more funding that can do more good work for all species--all to address a rulemaking dispute over a regulation that hasn't even been in effect for a season. This is a perfect example of throwing the baby out with the bathwater. The critical point in this is that all of the people pushing for this legislation are doing so specifically to LIMIT opportunity to hunt, fish or trap, based not on science, but on their personal ideology. With opportunity equaling funding, which equals greater conservation work for both game and no-game species and habitats, this will harm our wildlife in the future. Since I have never seen anyone document how my regulated, sustainable opportunity to hunt, fish or trap limits anyone else's opportunity to enjoy wildlife however they see fit, this bill clearly will create a net loss for everyone.

Lastly, the climate around hunting, fishing and trapping regulation is toxic at best, and makes it virtually impossible for any hunter, angler or trapper who is awake and following events in Vermont and across the US, to support a nuanced position around these issues. Highly organized, well-funded national groups are targeting specific "easy targets" such as trapping and hunting with hounds, that the mostly urban and suburban public don't understand or have familiarity with, quite often using cherry-picked data and half-truths that omit critical information in order to garner support for an emotional argument—I've seen numerous of these examples in testimony from anti-hunting organizations on this very bill. Several of these groups are open about saying they believe all hunting, fishing and trapping should be banned, while others "officially" claim they have limited targets. Unfortunately the distinctions made by these groups in defining their ultimate "target" in many cases are so arbitrary that it is highly questionable to many hunters anglers and trappers whether they will stop at hunting coyotes with hounds, or if they will be after bears next, then rabbits, then ruffed grouse, then waterfowl, etc. I'm not one to wear a tinfoil hat, but the obvious appearance is that all of these bills are only an incremental first step, especially when you see the level of vitriol and violence expressed toward hunters and anglers in some cases during conversations on the topic. The legislature needs to play a much more productive role in this process by ensuring that any legislation not only recognizes the continued societal relevance and value of hunting, angling and trapping, and the critical role these activities have played and continue to play in recovering and maintaining our game species and habitat, as well as the beneficial part that has played in non-game species conservation as well; but also that these activities continue to be important parts of Vermont's cultural, food and health landscape that should be celebrated and maintained--not reviled and undermined, which seems to have become the status quo. None of the various bills to ban hounding, trapping, or otherwise restrict various hunting activities have made even a baby-step at stating these values or trying to maintain them in the interest of finding common ground. Based on this it should come as no surprise to anyone that hunters, anglers and trappers are hostile toward these efforts. The typical response to this is that "if hunters did a better job of policing their own we wouldn't need to"--to which I respond that 1) if anti-hunting groups didn't consistently twist the facts toward their agenda many of the "problems" would not turn out to be nearly as problematic, 2) we all leave a footprint, and everyone who

participates in modern society harms wildlife. That I choose to procure my own food, and that I cause some harm to individual animals in the process, does not make me a bad person. In fact, I made a conscious decision to do this because I believe it puts me in a *better* position ethically and environmentally, makes me more aware of the impact I do have, and makes me appreciate and value (and give back to) the world I live in to a *greater* degree, and 3) the fact that I make these choices is not harming anyone else's ability to enjoy wildlife in other ways. My presence in the woods during hunting season is not a danger to anyone—hunting, especially to bystanders, is statistically safer than most activities we take for granted such as hiking, skiing and mountain biking. If you want to see a moose, it is not the fact that there were a tiny number of moose hunting permits issued on the recommendation of the department biologists only in the few management units where populations are still relatively robust, that will prevent you from doing so—it is climate change and increasing winter tick populations that will prevent you from doing so. If you want to see a coyote, it is not hounding that will prevent you from seeing one—it is the fact that coyotes are nocturnal or crepuscular, secretive by nature, and really, really sneaky, that will prevent you from seeing one. If you want to see one, there are plenty in my back yard in Jericho, I have them on my trail cameras almost every night (and yes, I enjoy seeing them). If you visited a local town forest and didn't see a deer or a fox, that is not because people hunt there for a couple months of the year, that is because we have put a trail-system there so dense and expansive that no self-respecting wild animal would be caught there during daylight due to the excessive human traffic 365 days a year. If you're worried about dangerous domestic animals harassing and killing vulnerable wildlife, maybe rather than undermining what regulated hunting practices are in place today consider doing something about house cats left to roam the neighborhood, which have a vastly greater impact on wildlife than do hunting dogs of any kind. We have a biodiversity crisis, but we also have robust populations of deer, turkey, waterfowl, bears, and many other animals that were locally extinct 150 years ago, including moose—it was hunters and hunters dollars who reintroduced and recovered these populations, the same as they are doing right now with elk across much of the Midwestern and Eastern portion of their former range, the same as they are doing with wild sheep across the Rockies and West, the same as they continue to do with waterfowl and other species who are feeling the effects of human impact. The fact that climate change, human-caused habitat conversion, and other large-scale problems are negatively affecting wildlife does not change these facts.

If you truly value wildlife and want to help wildlife populations, work to develop a dedicated funding source for non-game wildlife and habitat conservation that DOESNT negatively affect the existing conservation tools we have around hunting, fishing and trapping, but adds to them. That would be truly helpful, that would be truly inclusive, and that would truly value the positive contributions provided by both hunters, anglers and trappers, as well as those consumers of wildlife and habitat that don't do so with a gun, bow, trap or fishing rod. We need more common ground, and more ways to see

the common ground we do have, and this bill and others like it are squarely preventing that collaboration from happening.

If you're still reading, I have heard from very few of my representatives on this topic, despite having been in touch several times. I will check to see how everyone eventually votes, but if you care to follow up I'd certainly appreciate hearing not just how you came down on this bill, but also how you land on some of the points I've made.

Thank you very much,  
Dave Furman  
Jericho, VT