



**BACKCOUNTRY
HUNTERS & ANGLERS**
NEW ENGLAND

Attn: Members of the House Committee on Environment and Energy
Vermont State House
115 State Street
Montpelier, VT 05633-5301
Re: S.258 – Act Relating to the Management of Fish and Wildlife

April 17, 2024

Dear Chairwoman Sheldon and the Committee on Environment and Energy,

We are writing on behalf of the Vermont members of Backcountry Hunters & Anglers (BHA) to express our concerns about S.258. Our members are hunters, anglers and trappers who support policies that promote backcountry experiences, healthy fish and wildlife habitat, and sound stewardship of public lands and waters.

We do not support S258. The Vermont Fish and Wildlife Department is well-run and effective within the current framework, one that has a long history of success. We believe many voices are currently welcome within the management of VT's wildlife and we continue to support that. We have bulleted many of our concerns with S.258 below and are happy to expand upon them at your convenience:

- The bill is trying to address perceived problems with hunting, fishing, and trapping regulations via a total overhaul of the successful existing process, with an underlying but clear intent to limit future hunting opportunity. Hunting opportunity directly translates to conservation funding and involvement in conservation. A loss of opportunity will be a direct loss to future wildlife and habitat conservation efforts.
- S258 creates layers of inefficiency at the Dept of F&W and within the Agency of Natural Resources (ANR) that will further detract from F&W and ANR accomplishing their conservation work and overall missions.
- This bill removes regulating authority from the F&W board and effectively hand that power over to a single, appointed commissioner of F&W. The Commissioner also happens to be in a position of power over the F&W biologists who we rely on for the science behind our management. This dynamic will over-politicize the appointment of future commissioners, influence the science being done within the department, and increase politically-driven regulation
- We believe this bill originated out of a dispute between 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. This issue should be addressed through the existing administrative procedures act, not via a total overhaul of the board and regulatory process.
- Hunters, anglers, and trappers have a large role in setting regulation because they fund the large majority of the dept's budget between license sales and federal excise taxes on hunting, shooting, and fishing equipment, and because these activities are specifically protected in Vermont's constitution. This makes them a vital stakeholder group in setting regulations. No other user group is required to contribute to this public trust in order to utilize it, despite other users also having a significant impact on wildlife and habitat.
- The proposed role of the new board expands beyond setting regulations for hunting, fishing, and trapping. The expanded role will require additional time and staff from the Department and ANR, for which there is no funding source other than to take away from existing conservation work.
- S258 requires creation of a non-game plan. We already have the Vermont Wildlife Action Plan. This is one of the most comprehensive and forward-thinking non-game wildlife plans in the US and already incorporates public feedback. Creating a new plan will be redundant and require unnecessary resources, negating the implementation of the existing plan.
- This bill is detrimental to the collaboration needed to build on Vermonters shared values around wildlife. The legislature must play a leading role in fostering collaboration by ensuring that legislation affecting wildlife management recognizes the continued relevance and value of hunting, angling, and trapping in recovering and maintaining our game species and habitat, as well as the role these activities play in non-game species conservation. Hunting, angling, and trapping continue to be important parts of Vermont's cultural, food, and health landscape that must be recognized and maintained to truly include all stakeholder groups.

Respectfully submitted on behalf of the VT BHA State Leadership Team and our members,

Matthew Breton, Co-Chair VT BHA
Charleston, VT