



NEW ENGLAND BACKCOUNTRY HUNTERS AND ANGLERS

April 25, 2021

Re: BHA Opposition to VT H.167 Conservation and development; fish and wildlife; Agency of Natural Resources; Environmental Stewardship Board

Dear Members of the House Committee on Natural Resources, Fish, and Wildlife

We are writing to you on behalf of the Vermont members of Backcountry Hunters & Anglers (BHA) to oppose bill H.167. BHA is one of the fastest-growing conservation organizations in the country. Our members are a diverse group of Vermont hunters and anglers of all ages and backgrounds, who support policies that expand and protect responsible hunting and fishing opportunities, promote backcountry experiences, healthy fish and wildlife habitat, and sound stewardship of public lands and waters.

H.167 would establish an Environmental Stewardship Board to oversee all actions of the Agency of Natural Resources (ANR). We oppose this bill for two reasons. First, we believe it will have a negative impact on the functioning of the ANR, especially the Department of Fish and Wildlife and the Fish and Wildlife Board. Second, we oppose this bill because it represents a drastic change to the function of the agency, which should require a much higher degree of public debate and scrutiny than is possible this late in a remote legislative session.

As proposed, H.167 suggests that Secretary Moore and the Agency of Natural Resources are not capable of stewarding VT's natural resources. We wholeheartedly disagree. ANR has continuously managed a vast array of lands, waters, and issues skillfully for more than a century, with evolving techniques and strategies based in science that is reviewed and applied by a staff of scientists and professionals, which also includes a robust public process and ongoing collaborations with the very same organizations that would sit on the Environmental Review Board. While this process is challenging, it works and the results have been positive.

The management of Vermont's public resources is a complicated process that will be even more difficult with another layer of bureaucracy. Citizen involvement is already incorporated into this process, the Governor is elected and appoints the Secretary of ANR. Citizens also elect the legislature, who provides the legal framework within which the Agency works. There are multiple opportunities for public input related to specific issues and concerns. We feel that our comments are heard when we weigh in on the actions in any of the three Departments within ANR. As one voice among many who care about our wildlife and wild places, we realize that a government agency must hear multiple voices, weigh the science, and come to a decision, even when it means that we don't always get what we want. The new Environmental Review Board turns this model on its head by virtue of being composed of select predetermined organizations with the power to approve all agency policy, reducing the public's ability to weigh in on the management of our public resources.

Specifically pertaining to the interests of BHA's membership, H.167 undermines the successful North American Model of Wildlife Conservation that has resulted in increased populations of wildlife across the country, which has as one of its tenets that wildlife is a public resource including for

sustainable harvest. Access and opportunity must remain part of the equation used to determine hunting and fishing regulations for the North American Model to work. These are the very reasons this model has been successful in not only bringing nearly-extirpated species such as deer, bear and wild turkeys to the healthy population levels we see today, but has also played a significant role in funding and implementing bald eagle and loon recovery, little brown bat research, songbird habitat and a slew of other non-game related functions the Fish and Wildlife Department performs. H.167 will reduce access and opportunity for VT citizens to hunt and fish for wild food, which, in turn, will reduce participation and the relevance of hunting and angling in the long term. This would decrease Vermont's access to funding from programs such as Pittman-Robertson and Dingell-Johnson matching tax funds, the Federal Aid in Wildlife Restoration Act, and the Federal Aid in Sport Fish Restoration Act, disrupting a successful model of conservation and harming both game and non-game wildlife and habitat.

The attempt to circumvent the existing processes within the Fish and Wildlife Department is also redundant since there already is a citizen board involved in rulemaking that takes considerable public comment, in conjunction with the professional staff and scientists within the ANR. We believe an additional step to these processes will delay the implementation of scientific management by creating more work for an already-overworked staff and detract from important time spent on actually managing Vermont's resources. In addition, legislating ultimate "veto-power" over the ANR to a select and focused group of predetermined organizations reduces public input in the functioning of this agency.

BHA believes the current process is already a proven framework, that utilizes new science and data as it becomes available, and benefits all Vermonters regardless of whether they choose to hunt or fish, and should, therefore, not be drastically changed; certainly not without an extremely robust public process. Please do not advance H.167.

Respectfully submitted on behalf of our members,

State Leadership Team, VT Backcountry Hunters & Anglers

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