



April 24th, 2024

TO: Rep. Amy Sheldon, Chair, Committee on Environment and Energy
Rep. Laura Sibilgia, Vice Chair, Committee on Environment and Energy
Rep. Seth Bongartz, Ranking Member, Committee on Environment and Energy

RE: Concerns with S. 258, legislation that would change the structure of the harvest regulatory authority of the Vermont Fish and Wildlife Board

On behalf of Ducks Unlimited, Inc. (DU), we appreciate the opportunity to provide comments on our concerns with S.258, which would amend the authority of the Vermont Fish and Wildlife Board.

Ducks Unlimited is the world leader in wetlands and waterfowl conservation. Founded in 1937, we have been protecting and restoring wetlands in Vermont for decades. Our mission has singleness of purpose: to conserve wetlands, waterfowl and related habitat and species for all, as a science-based organization. DU has conserved more than 5,580 acres of wetlands in the state and has invested nearly \$4 million dollars into Vermont's landscape. We have a dedicated group of more than 1,200 members in the state, some of whom are waterfowl hunters, but all of whom are staunch advocates for conservation. We are committed to the protection of the state's precious natural resources using the best available science.

We have several concerns with S. 258, which would limit the decision-making authority of the Vermont Fish and Wildlife Board. Currently, the Vermont Fish and Wildlife Board is responsible for wildlife harvest allocations and regulatory decisions for game species only. These regulatory decisions are determined through a deliberative process, informed by scientists at the Department of Fish and Wildlife, in accordance with the North American Model of Wildlife Conservation. The North American Model, (the most successful wildlife and habitat conservation model in the world) holds wildlife in the public trust and uses the latest science and active management policies to implement the preeminent system for continent-wide wildlife conservation. Changing the composition of the Board and eliminating their regulatory authority (making them solely advisory in capacity) upends a process that has been in place in Vermont for 63 years. Since the advent of the Board, Vermont has seen a resurgence of game species, many of which were once on the brink of extirpation, like the whitetail deer, wood duck and the eastern wild turkey. Additionally, the 2019 State of the Birds Report published by Cornell University, identified a decline since the 1970's in nearly all families of birds except one: waterfowl. Waterfowl in fact saw a noticeable increase during this time. This was directly due the unique funding model of waterfowl conservation (hunting license and duck stamp sales) but also the unique management model for these birds (State Fish and Wildlife Boards).

We believe the state of Vermont, and its Fish and Wildlife Board, have stayed true to the principles of the North American Model, and does not require changes to continue its stellar record for

wildlife management. Though these proposed changes are a significant shift in how the state sets hunting seasons, the wider conservation and scientific community was not consulted. We encourage opportunities to make decision-making processes for conservation stronger, and this can only occur when ALL stakeholders are at the table. We are hopeful that there will still be an opportunity for all voices to be heard before major changes are made to the current system.

A critical, though often overlooked, component of the Department of Fish and Game's remit is management of non-game species, like songbirds and small mammals. Though a large portion of the Department's budget (\$8 million annually) comes directly from hunting, fishing, and trapping license sales, the majority of their time and resources is spent managing species that are not pursued but are equally important to Vermont's natural identity. Aside from managing species populations, the Department also manages and restores wildlife habitat around the state. By making changes to the Board, without engaging the wider conservation and scientific community, the state puts at risk the comprehensive work the Department's biologist and land managers have endeavored towards for more than half a century. As the world leader in wetland conservation and wetland science, we understand the need for diverse views in wildlife conservation. However, we are steadfast in our belief that these diverse views should be rooted in science, with the consensus of the wider conservation community, and not based on a small population of individuals.

DU represents diverse conservationists, scientists and outdoorspeople who have a longstanding history and tradition in Vermont. This tradition not only contributes millions of dollars to conservation, but also boosts the state's economy as well as employs thousands of people each year. If passed, the change in authority of the Vermont Fish and Wildlife Board could result in a detriment to wildlife management and a decline in the very species that we all seek to protect and proliferate.

Thank you for your continuing efforts to protect the birds, wildlife, and public lands of Vermont. We ask that you reconsider this legislation. Thank you for your consideration and please contact us if you have any further questions.

Sincerely,

Michael Gardner
State Chair, Vermont
Ducks Unlimited

CC: Sen. Christopher Bray, Chair, Committee on Natural Resources and Energy
Sen. Anne Watson, Vice-Chair, Committee on Natural Resources and Energy
Commissioner Christopher Herrick, Vermont Department of Fish and Wildlife