

Good afternoon. I am Rob Mullen of West Bolton and the Board Chair of the Vermont Wildlife Coalition.

In 1962, my brother Frank and I were wildly amazed to see two wolves loping through the pasture behind our house in Jericho Center. Our father dampened my enthusiasm for a moment by telling us that they were coyotes, but it didn't last: coyotes or not, they were big and wild like something out of a storybook. This encounter, while not my first with wild animals, helped propel a growing passion for adventure and wildlife. It excited me that such magnificent beasts were here, though I still wanted to see wild wolves.

Now, our house is among the remains of a gone-wild apple orchard my paternal grandfather planted in the '40s with a 10-acre beaver pond in the backyard, so, predictably, we have deer, bears, and other critters. In addition to such casual daily encounters, I have a biology degree from UVM, have observed wildlife professionally as an artist and writer for over 35 years, led over 20 wilderness expeditions from Labrador to Alaska (and have seen quite a few wolves), and am the lead author of a natural history of the boreal forest in collaboration with the Smithsonian's Arctic Studies Center at the NMNH that should be out early next year.

The first big wildlife management controversy that I became aware of shortly after I started deer hunting in the 1960s was over doe permits. My maternal grandfather in Proctor was disgusted at the idea. Dad, a high-school science teacher, worked to convince him that the badly overpopulated deer herd of the time (200,000+) could only be brought closer to the carrying capacity of our environment by killing does. With considerable effort, Dad succeeded. On a statewide basis, the F&W Department did the same with the wider hunting community, stuck to the science, and continued the program. Today's deer herd is more sustainable, 130,000 or so.

I left Vermont for work but returned after almost 20 years, in time for another wildlife controversy. Having won the VT Duck Stamp competition, I was working with the FW Department at about the time that the Department proposed rules against the wanton waste of wildlife. Who could object to that? Well, to my great disillusionment, "sportsmen's" organizations did, and the entire idea was drowned in the tub by something called the Fish and Wildlife *Board*. It was the first time that I had heard of it. I was surprised, and not in a good way, to learn this board, established in 1961, was composed entirely of sportsmen who make the rules by which they themselves must abide, not the trained professionals in the Department nor the legislature, which has the Constitutional duty to do so.

Appointed by the Governor in an utterly opaque process, members are also responsible for "... *the conservation of fish, wildlife, and plants and their habitats for the people of Vermont and to protect the integrity, vitality, and diversity of all natural systems....*" according to the Governor's website. That is a tall order considering that there are no formal expertise qualifications required for FWB members. In fact, being some combination of hunter, trapper, and angler is apparently the only tacit requirement. Conflict of interest, tunnel-visioned bias, and a focus on one special interest group instead of "...the people of Vermont..." are baked in.

That the Board's agenda has often overlapped with or at least not been at odds with good wildlife management has been more a matter of happy circumstances of past decades rather than the result of efficient, rationally designed wildlife governance. With the accelerating challenges of habitat loss, the increasing human population, climate change, pesticides, rodenticides, and heavy metal pollution, a blinkered focus on the harvest of animals was bound to run off the rails and continue to do so. That was on display in the events leading to the head-on collision between the Board and the Legislature last year in LCAR. This latest and most obvious display of agenda-driven intransigence is a clear sign of the need to update our wildlife governance to meet the challenges of the 21<sup>st</sup> Century. The expertise of hunters, trappers, and anglers is obviously valuable in crafting hunting, trapping, and fishing rules. However, their input, as with the vast majority of government boards, should be advisory, and as an advisory Board, the membership would do well to more inclusively represent the "...people of Vermont..." that the Board is supposed to serve.

One objection to the Department assuming rule-making authority is the potential increase in workload and expenses. However, from what I've seen of the process, the Department already does all of the heavy lifting of researching and proposing rules for the Board to simply vote on. By eliminating the need to tailor potentially controversial rules to suit the Board's preferences and then convince the FWB, we can expect more effective rules and significant time and cost savings. For example:

In 2016, the VT Trappers Association petitioned the Board to extend the otter and bobcat trapping seasons. It was the Department, not the Board, that spent tens of thousands of dollars (nearly the entire furbearer project budget for the year, according to what a biologist involved told me) and staff time researching and proposing responses to the petition, knowing that they would have a fight on their hands if they proposed denying one, let alone both season extensions. In the end, the Department, which had no desire or plans to extend either season for any management reason, split the baby by proposing an extension of the otter season (*contrary to the biological reasoning for the shorter season on their own website*) and a denial of the bobcat season extension. Department biologists presented a long, detailed presentation at a Board meeting. The biologist presenting the Department's case against extending the bobcat season ended up hyperventilating into a paper bag – possibly half in jest and all in earnest - and the Board fell only one vote short of overriding the Department's recommendation.

Act 159 revealed a similar process. I served on Act 159's trapping working group, so I had a front-row seat. I attended all of the LCAR meetings dealing with the fallout from Acts 159 and 165. I heard the rationales for shuffling around in an appearance of action while vigorously protecting the status quo. The Department spent money and time proposing and promoting rules and the Board simply voted ... eventually against the Department's suggested compromise ... and here we are.

VWC has long supported a closed season on coyotes that accords them the respect given other big game. The FWB rejected a petition for a five-month season from students at Vermont Law School, insisting on continuing to treat this valuable species as vermin with a 24/365 kill as many as you want, kill them any way you want open season. Historically, as noted above, the Board opposed any ban on wanton waste of wildlife. They have opposed the banning of coyote killing contests, refused to end crow killing contests, and most recently refused to ban the knowing killing of a mother bear with cubs. The image of hunting created by the tolerance of such behavior is repellent and is what new residents and younger Vermonters see. No wonder hunting license sales are lagging. This Board's stubborn adherence to a reactionary culture war agenda is bad for hunting. S.258 could be a start at repairing that issue.

VWC strongly supports ending the practice of killing coyotes with hounds. The practice is a source of ongoing conflict with landowners and poses a risk to people's pets and property. As commonly practiced, it sullies the image of hunting, serves no ecological purpose, and encourages wanton waste.

Similarly, we strongly support ending the practice of hunting coyotes over bait. This is banned for hunting other wildlife, and for good reason. It doesn't solve problems; it creates them and has led to the tragic deaths of family pets.

*In closing, there is an ecological concept that is frequently misused or misunderstood when discussing hunting and its role in management. In Vermont today, it is necessary for humans to hunt deer to keep the deer herd from growing so large that it threatens forest productivity and biodiversity. This is because all herbivores need predators to help keep their populations within the carrying capacity of their environment, and the only wild predators that could significantly check the population growth of such a large, strong, and fast species as whitetail deer were exterminated in Vermont over 100 years ago. This is not true of other species in Vermont. Species such as turkeys, grouse, rabbits, and waterfowl have plenty of wild predators, though they can generally withstand the added mortality of regulated hunting and provide a healthful source of food and self-sufficiency for hunters and their families. Still, human hunting is not necessary to manage their populations as it is not necessary to manage the populations of porcupines or chipmunks. That is doubly true of predators.*

*Predator populations are necessarily far smaller than the herbivores they prey on and, therefore, much more strongly affected by self-regulatory population mechanisms such as reproductive response to environmental factors and territorial competition. Many species are capable of these adaptations, though they are usually only weakly expressed in herbivores and generally only tinker around the edges of their population levels. In smaller predator populations, these mechanisms are highly effective so that predators do not need predation. The proof of this is simple: T. Rex didn't need humans to manage their populations and modern wilderness ecosystems also manage perfectly well without us. Nonetheless, many people assume that because deer need to be hunted to keep their population within ecological limits, this applies to any species that they wish to hunt, such as coyotes.*

*Of any species in Vermont, this is the farthest from true for coyotes. Studies have shown that it would take a sustained program of killing 70% of a coyote population across their range year after year to actually reduce, let alone eliminate, coyotes. The far better means of controlling coyotes is not feeding them, accidentally or on purpose, and if necessary, hunting particular problem coyotes (as would be allowed under S.258 and other statutes already on the books as protection of property).*