

Dear Senate Committee on Natural Resources:

I'm writing in response to Commissioner Herrick's verbal testimony from 2/21 and his claim that S.258 is going to necessitate two additional staff members. Why is that? All this bill does is change the rulemaking authority from the Fish and Wildlife Board to the Fish and Wildlife Department. The Department is already performing a lot of the work that they'll be required to perform under S.258.

The Commissioner also questioned the need to ban coyote hounding because the new rules just went into effect. He's surprised by the bill to ban coyote hounding, yet he and the Board were cautioned throughout the LCAR process that GPS and electric collars don't constitute control of hounds. He left the legislature with no other option than to ban coyote hounding outright.

I appreciate Senator MacDonald's point that what happened in LCAR with the trapping (Act 159) and coyote hounding (Act 165) rules supports the need to change the current system. The Board defied LCAR's objections, even when the Department ultimately agreed to modify its rule in response to two of LCAR's objections (exempting traps placed in water from setback requirements and redefining trapping as a form of hunting). Since the Board had the final authority, the rule went into effect and resulted in a lawsuit (and this bill!).

To Senator White's point, decisions made by the Board (e.g. bag limits on the number of otters and bobcats that may be trapped, seasons on black bear hunting, etc.) impact all Vermonters, not just those who participate in these extractive activities. The Commissioner is myopically focused on attracting new license holders versus attracting new, diverse stakeholders, including those non-license holders who recreate passively in nature. Putting non-license-holder stakeholders on the Board will make them invested in the process and, hopefully, eventually more inclined to fund the Department, creating a pathway for conservation into the future.

It is evident that the Department is digging in their heels and will not accept Vermont's changing values and attitudes toward wildlife unless they are forced to. Bill S.258 provides a charter for a future of conservation where all voices will be heard.

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