

## **Fish and Wildlife Board Meeting Minutes**

**Thursday, September 3, 2020**

The Vermont Fish and Wildlife Board held a meeting beginning at 5:00 p.m. on Thursday, September 3, 2020 via video conference. The ZOOM meeting ID was: 836 7456 3117, the dial in phone number was 929-436-2866

### Agenda:

- 1) Approval of Previous Meeting Minutes.
  - May 20, 2020, and
  - June 3, 2020
- 2) Public Comments (Limited to 2 minutes per speaker)
- 3) Turkey and Big Game Reporting Rule Changes, Second Vote
- 4) Fishing Regulations Discussion and Department Update
- 5) Commissioner's Update
- 6) Roundtable

**Board Members in Attendance:** Tim Biebel (Board Chair); Brian Bailey; Michael Bancroft; Wendy Butler; Michael Kolsun; Bryan McCarthy; Dennis Mewes; David Robillard; Nancy Matthews; Jay Sweeny; and Martin Van Buren.

**Department Staff in Attendance:** Louis Porter, Commissioner; Mark Scott, Wildlife Division Director, Eric Palmer, Fisheries Division Director, Catherine Gjessing, Department General Counsel; Lt. Keith Gallant, Southern District Supervisor; Will Duane, Executive Assistant; Adam Miller; Wildlife Program Manager; Maureen Lynch, Fisheries Program Manager; Margaret Murphy, Fisheries Program Manager; Bernie Pientka, Fisheries Biologist; and Spc. Russ Shopland, Game Warden.

**Members of the Public in Attendance:** Five members of the public joined the meeting and could not be positively identified by their phone numbers or usernames.

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The Meeting was Called to Order by the Chair at 5:00 PM

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### **Approval of Previous Meeting Minutes**

Two corrections were offered for the unapproved minutes from the June 2020 meeting. David

Robillard was incorrectly marked as absent, and Dennis Mewes offered a typographical correction.

The May and June 2020 meeting minutes, as amended, were approved by a unanimous voice vote.

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### **Public Comments (Limited to 2 minutes per speaker)**

No members of the public addressed the Board.

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### **Turkey and Big Game Reporting Rule Changes and Second Vote**

The turkey rule at 10 V.S.A. App. 22 was unchanged from its initial approval at the May 2020 Board Meeting. It was approved by a unanimous voice vote 11-0. The rule change is attached to these minutes.

The big game reporting rule at 10 V.S.A. App. § 2 was amended after the close of the public comment period to incorporate suggestions from the comments received. The language of the rule change was amended again during the meeting to clarify the means of electronic reporting. The amended rule change was approved by a unanimous roll call vote 11-0.

The rule change, as presented to the Board at this meeting and as passed, are both attached to these minutes.

Public comments received during the comment period are attached to these minutes. Note: the initial summary of public comments delivered to the Board missed 28 of the approximately 95 written comments received. The error was corrected, and the Board received the full compilation of comments the following week.

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### **Fishing Regulations Discussion and Department Update**

The fisheries division presented its work from the last year on its efforts to simplify fishing regulations for anglers statewide. The slides from the presentation are attached to these minutes and are posted on the Department's website. The Department intends to hold public informational meetings this fall.

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### **Commissioner's Update**

- Department staff are still working from home under the COVID-19 emergency orders. Staff are occasionally accessing buildings and offices for necessary work items.

- Bear complaints continue to create work for Department staff. Wardens have received more than 700 complaints this summer. Biologists have received several hundred reports as well.
- The turkey brood survey ended on August 31<sup>st</sup>. Department staff will be working big game check stations during the youth and November rifle seasons.
- Staff have been working on outreach and information ahead of the deer season starting next month. New regulations for deer hunting go into effect this fall. Reaction from the public is generally positive especially among those who attended the public hearings.
- The fish with a warden program has been successful, all workshops were fully subscribed.
- The Department is finishing up the 10-year big game plan, which should be complete by the end of October. Thanks to acting LT Keith Gallant for his support of the big game team.
- Mark Scott has returned from a brief medical related absence. It's remarkable to see and get a glimpse of the amount of work he does for the Department.
- The Department's hunter mentoring program has gotten off to a successful start. Hunter Ed program instructors are mentoring new hunters in small groups.
- Starting on October 1 the Department will restrict online hunter ed certification to those who are 12 years old and older. Online hunter education will continue with the age restriction in place. Around 2,500 new hunters have been certified since the start of the COVID-19 pandemic.

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The meeting was adjourned at 7:13 PM

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*The mission of the Vermont Fish and Wildlife Department is the conservation of all species of fish, wildlife and plants and their habitats for the people of Vermont.*

**TITLE 10 APPENDIX  
CHAPTER 1. GAME  
Subchapter 1. General Provisions**

**§ 22. Turkey Seasons**

1.0 Authority

1.1 This rule is adopted pursuant to 10 V.S.A. § 4081(a). In adopting this rule, the Fish and Wildlife Board is following the policy established by the General Assembly that the protection, propagation, control, management, and conservation of fish, wildlife and fur-bearing animals in this State is in the interest of the public welfare and that the safeguarding of this valuable resource for the people of the State requires a constant and continual vigilance.

1.2 In accordance with 10 V.S.A. § 4082, this rule is designed to maintain the best health, population and utilization levels of the turkey flock.

1.3 In accordance with 10 V.S.A. § 4084, this rule establishes daily, season and possession limits for game, territorial limits; to prescribe the manner and means of taking; to establish territorial limits for the taking of turkeys; and to establish restrictions on taking based upon sex, maturity or other physical distinction.

2.0 Purpose The purpose of this regulation is to establish seasons for the taking of turkeys, to establish open Wildlife Management Units (WMUs) for the taking of turkeys, to establish methods of taking turkeys and to establish limits on the number of turkeys to be taken.

3.0 Definitions

3.1 "Commissioner" means the Commissioner of the Vermont Fish and Wildlife Department.

3.2 "Crossbow" means a device consisting of a bow mounted to a rigid stock for discharging bolts or arrows and having a mechanical means to hold and release the drawn string, which must be fired from the shoulder. A bolt means a short projectile for a crossbow that resembles an arrow and has a head that measures no less than 7/8 inch at its widest point. A crossbow shall have a minimum pull of 125 pounds, a working mechanical safety and a stock no less than 23 inches in length.

~~3.3 "Department" means the Vermont Fish and Wildlife Department.~~

~~3.4 "Legal means" means the taking of a turkey by shotgun, crossbow, or archery equipment in conformance with Section 6 of this rule.~~

3.4 "Novice" means a person who obtained their first hunting license within the past 12 months and is 16 years of age or older.

~~3.6 "Permit" means a document issued by the Department authorizing the taking of a turkey.~~

3.5 "Wildlife Management Unit" (WMU) means one of 21 geographical areas in Vermont for which big game regulations may vary.

3.6 "Youth" means a person who is 15 years of age or younger.

#### 4.0 Spring Season

4.1 Dates: May 1, through May 31, inclusive.

4.2 Shooting hours: One-half hour before sunrise to twelve noon.

4.3 Legal turkey: Only wild turkeys with beard(s).

4.4 Bag Limit: Two bearded wild turkeys per person per season.

4.5 Open WMUs: Open statewide

#### 5.0 Fall Season.

5.1 Dates and Open WMU's.

(a) Bow and Arrow, and crossbow only:

i. Dates: From the 1st Saturday in October to the beginning of the shotgun/bow and arrow/crossbow season.

ii. Open WMUs: Open Statewide

(b) Shotgun/Bow & Arrow/Crossbow Season

i. Dates: Nine consecutive days beginning 21 days prior to the regular deer season, inclusive.

ii. Open WMUs: B, D, G, H, I, J, L, M, O, P, and Q and their respective subunits:.

(c) Shotgun/Bow & Arrow/Crossbow Season

i. Dates: For 16 consecutive days beginning 21 days prior to the regular deer season, inclusive.

ii. Open WMUs: subunits: WMUs F, K, and N and their respective subunits:.

5.2 Shooting hours: One-half hour before sunrise to one-half hour after sunset.

5.3 Legal Turkey: Any wild turkey.

5.4 Bag limit: One turkey per person.

6.0 Legal Method of Taking:

6.1 Only a shotgun, crossbow, or bow and arrow may be used.

6.2 Only number 2 or smaller size~~through number 8~~ shot shall be used or possessed.

6.3 An arrowhead must be at least 7/8th of an inch in width and have two or more cutting edges.

6.4 Rifles shall not be used or carried by any person while hunting turkeys. A person taking a turkey with a crossbow or bow and arrow may carry a handgun in accordance with 10 V.S.A. § 4252(b), however, that person may not use the handgun to take turkey.

6.5 No person shall use dogs in the spring, nor electronic calling devices, bait, live decoys, or participate in cooperative drives during either season.

6.6 Any person wishing to hunt turkey with a crossbow or bow and arrow must hold proof of having held an archery license or a certificate of satisfactory completion of a bowhunter education course from Vermont or another state or province of Canada which is approved by the Commissioner.

6.7 Unless it is uncocked, a person shall not possess or transport a crossbow in or on a motor vehicle, motorboat, airplane, snowmobile, or other motor-propelled vehicle except as permitted in accordance with 10 V.S.A. § 4705.

7.0 Youth Turkey Hunting Weekend

7.1 Youth turkey hunting weekend shall be the Saturday and Sunday prior to opening day of spring turkey season on May 1. Legal shooting hours shall be one half hour before sunrise until 5 p.m.

7.2 Legal Turkey: Only bearded turkeys may be taken.

7.3 Bag limit: One bearded turkey per youth. A youth may also hunt during the spring season and take two bearded turkeys during that season.

7.4 ~~Season: One half hour before sunrise until 5 p.m.~~ To participate in the youth turkey hunt, a qualified youth must be 15 years of age or younger and have a valid Vermont hunting and turkey license and a youth turkey hunting weekend license.

7.5 The youth must be accompanied by an unarmed adult who holds a valid Vermont hunting license and who is 18 years of age or older. An adult accompanying a youth under this section shall accompany no more than two young people at one time. As used in this section, "accompany," "accompanied," or "accompanying" means direct control and supervision, including the ability to see and communicate with the youth hunter without the aid of artificial devices such as radios or binoculars, except for medically necessary devices such as hearing aids or eyeglasses.

7.6 No youth shall hunt under this section on privately owned land without first obtaining the permission of the owner or occupant.

8.0 Novice Turkey Hunting Weekend Season

8.1 Novice Season: This season shall be concurrent with the Youth Turkey Hunting Weekend as prescribed in 10 V.S.A. § 4908 and section 7.1 of this rule.

8.2 Limit: One bearded turkey per novice. A novice may also hunt during the spring season and take two bearded turkeys during that season.

8.3 To participate in the novice turkey hunting weekend, a qualified person must have a valid Vermont hunting and turkey license and a novice turkey hunting weekend license and follow the requirements of youth turkey hunting weekend.

8.4 The novice must be accompanied by an unarmed adult who holds a valid Vermont hunting license and who is 18 years of age or older. An adult accompanying a novice under this section shall accompany no more than two novice hunters at one time. As used in this section, "accompany," "accompanied," or "accompanying" means direct control and supervision, including the ability to see and communicate with the novice hunter without the aid of artificial devices such as radios or binoculars, except for medically necessary devices such as hearing aids or eyeglasses.

8.5 No novice shall hunt under this section on privately owned land without first obtaining the permission of the owner or occupant.

## AS Approved on Second Vote

ANNOTATED

10 App. V.S.A. § 2. Report, big game

(a) ~~A~~ Unless otherwise specified in the 10 App. V.S.A. section relating to the specific big game species, a person taking big game, as defined by 10 V.S.A. § 4001(31), pursuant to the seasons provided by law or regulation of the Fish and Wildlife Board, shall within 48 hours report the taking and exhibit the carcass in the manner required by the Commissioner. The Commissioner may authorize a person taking big game to report in the following manner<sup>s</sup> including but not limited to; electronic reporting via email or website or mobile application, telephone, or in-person reporting. The Commissioner may waive the exhibition of the carcass unless requested by a warden. The Commissioner shall publish the reporting and exhibition requirements. ~~to the nearest game warden, official Fish and Wildlife Department Reporting Station, or to a person designated by the Commissioner to receive the reports.~~

(b) Notwithstanding the reporting requirements of 10 App. V.S.A. § 7 subsection 8.3 of the Bear Management Rule and 10 App. V.S.A. § 33 subsection 14.3 of the Moose Management Rule, in the event of an emergency, the Commissioner may authorize any person who takes big game to report and exhibit the carcass in the manner required by the Commissioner. The Commissioner shall publish the reporting and exhibition requirements during the emergency period. For the purposes of this section, "emergency" shall mean "a serious, unexpected, and dangerous situation that poses a threat to public health or safe, or to wildlife or natural resources, and requires immediate action."(c) No big game carcass shall be transported out of the State without first being reported as required herein.

(d) The Commissioner shall pay to the authorized agent a fee of \$1.00 for each report taken on species where reports are required by law.



## AS Amended

ANNOTATED

10 App. V.S.A. § 2. Report, big game

(a) ~~A-Unless otherwise specified in the 10 App. V.S.A. section relating to the specific big game species, a person taking big game, as defined by 10 V.S.A. § 4001(31), pursuant to the seasons provided by law or regulation of the Fish and Wildlife Board, shall within 48 hours report the taking and exhibit the carcass in the manner required by the Commissioner. The Commissioner may authorize a person taking big game to report in the following manners any manner including but not limited to; electronic reporting via email or website, telephone, mobile application, or in-person reporting. The Commissioner may waive, and waiving the~~ exhibition of the carcass unless requested by a warden. The Commissioner shall publish the reporting and exhibition requirements. ~~to the nearest game warden, official Fish and Wildlife Department Reporting Station, or to a person designated by the Commissioner to receive the reports.~~

(b) ~~Notwithstanding the reporting requirements of 10 App. V.S.A. § 7 subsection 8.3 of the Bear Management Rule and 10 App. V.S.A. § 33 subsection 14.3 of the Moose Management Rule, in the event of an emergency, the Commissioner may authorize any person who takes big game to report and exhibit the carcass in the manner required by the Commissioner. The Commissioner shall publish the reporting and exhibition requirements during the emergency period.~~ For the purposes of this section, "emergency" shall mean "a serious, unexpected, and dangerous situation that poses a threat to public health or safety, or to wildlife and natural resources and requires immediate action."

(c) No big game carcass shall be transported out of the State without first being reported as required herein.

(d) The Commissioner shall pay to the authorized agent a fee of \$1.00 for each report taken on species where reports are required by law.

## **Proposed Turkey / Big Game Harvest Reporting Requirement Rule Changes Public Hearing Comments / Questions**

***August 24<sup>th</sup>, 2020 Virtual Public Hearing – up to 5 members of the public joined***

No Public Comment / Questions

***August 25<sup>th</sup>, 2020 Virtual Public Hearing – up to 7 members of the public joined***

**Chris Gonyeau – Georgia, VT**

Comment: I like the first two regulation changes (shot size / novice turkey hunting weekend) and I love the third regulation change (big game harvest reporting). I like the online reporting option and find it to be an advantage for quicker reporting, especially for the deer season early on when you don't want a deer hanging around too long.

## **Public Comment Voicemails Related to the Proposed Turkey / Big Game Harvest Reporting Requirement Rule Changes**

No voicemails received for the proposed rule changes

## **Public Comment Emails Related to the Proposed Turkey / Big Game Harvest Reporting Requirement Rule Changes**

Suggested comment (you can cut and paste): I am writing to provide public comment on the regulation proposal on reporting of big game. I oppose both proposals because they extend beyond the Board's authority to delegate its responsibilities. Both proposals are unnecessary and overly broad, including the lack of what constitutes an "emergency."

Betsy Cooke, Walden

Dear Department of Fish and Wildlife Stakeholders::

I am concerned about the proposed regulation on the reporting of big game. The proposed regulation would allow the Commissioner of Vermont's Department of Fish and Wildlife to allow hunters to report big game conquests in various ways, including electronic reporting. It would also allow the

Commissioner to loosen reporting requirements in the event of an emergency. Both elements bode ill for the future of wildlife conservation and our state's democratic processes.

By taking away the Fish and Wildlife Board's authority to regulate how game is reported, this proposal assigns far too much power to the Commissioner. In addition, it fails to define what would constitute an "emergency." It would be too easy for the Commissioner to loosen regulations during a real or perceived emergency and for hunters to unlawfully kill animals. The vague language and the consolidation of authority are troubling to anyone concerned about the preservation of wildlife in our state or the functioning of our Department of Fish and Wildlife.

Thank you for your time.

Best Wishes,

Dorothy A. Dahm

Hubbardton

Hi,

I am writing to provide public comment on the regulation proposal on reporting of big game. I oppose both proposals because they extend beyond the Board's authority to delegate its responsibilities. Both proposals are unnecessary and overly broad, including the lack of what constitutes an "emergency."

Thank you for your time,

Lindzey Beal

Wolcott, VT

I am writing to provide public comment on the regulation proposal on reporting of big game. I oppose both proposals because they extend beyond the Board's authority to delegate its responsibilities. Both proposals are unnecessary and overly broad, including the lack of what constitutes an "emergency." In addition, online reporting allows unethical hunters to submit inaccurate information that may skew the biologists' data. In-person reporting should be required for all big game that are killed.

Chris Kwolek

Wells,VT

Good Day! As a fourth-generation Vermonter whose great-grandpa started a very prominent business in Winooski back in the 1920's which continues today, I am writing to provide public comment on the regulation proposal on reporting of big game. I oppose both proposals because they extend beyond the Board's authority to delegate its responsibilities, something I am guessing my compassionate relatives would also want. Both proposals are unnecessary and overly broad, including the lack of what

constitutes an "emergency." This is a plea from my heart and that of all Vermonters who treasure our wild sentient beings...May you stay purrfectly healthy during this time...Eternal gratitude for your serious consideration....Gwen Donovan, South Burlington, Vermont...here's a few of my art pieces celebrating the awesome environment we love...



To whom it may concern:

I am writing because I am opposed to the proposed regulation on big game reporting. I believe that in order to best manage wild game hunters should be required to report their kills in person. Doing so allows collection of data which can only be obtained in-person such as the animal's weight, its physical condition, whether it has signs of any diseases, et.. Furthermore I believe this proposal would give the Commissioner too much power and is hence contrary to the purpose of the Fish & Wildlife Board.  
- Jay Hersh  
Hyde Park, VT

I am writing to offer public commentary opposing proposed state regulations that would loosen reporting requirements for big game kills in Vermont.

I strongly oppose these proposals as unnecessary and overbroad. They overstep the Board's authority to delegate its responsibilities, and they fail to define what constitutes an "emergency." Failure to act within your jurisdictional boundaries or to define your terms are fatal drafting errors.

Allowing online reporting would make it easier for unethical hunters to skew the vital data collected by Vermont state biologists by submitting false information.

Killing big game in Vermont should, at the very least, impose a requirement that hunters report their kills in person.

Thanks you for being responsible stewards of our state's precious willdlife.

Susan Sively  
Brattleoboro VT 05301

I am writing to provide public comment on the regulation change to the Fish and Wildlife Board on reporting of big game. The legislature created a process for managing hunting and reporting of big game. The process includes decision making by the Fish and Wildlife Board.

The Commissioner should play an administrative function and work with the board to develop and execute its policy. I oppose both proposals because they ask to extend beyond the Board's authority to delegate its responsibilities. Both proposals are unnecessary and overly broad, including the lack of a definition for what constitutes an "emergency."

Thank you,  
Lise Anderson  
Cornwall

I am against both of the currently proposed changes in reporting.

Responsibilities of the board should not be moved to the commissioner. We are a democracy and the board is the appropriate place for decision-making. Furthermore, the lack of a definition for "emergency" is very troubling.

The current reporting rules are based on scientific practices which ensure that we have the data needed to effectively manage wildlife. It is unlikely that all hunters reporting online will recognize the importance of accurate reporting in service of this management.

Janis Hall Brattleboro, VT

We are writing **to oppose** the Department's regulation proposals on the reporting of big game. The proposed regulation would give the Commissioner unfettered discretion to determine the manner in which big game, other than moose and bear, are reported to the Department after the animals are killed. The proposal would also give the Commissioner unilateral authority to weaken the strict reporting requirements for moose and bear in the case of an **undefined** "emergency." The Board already has the authority to promulgate emergency rules and, in fact, just did that in April due to COVID-19 with regard to turkey hunting. There is no need for the Commissioner to usurp the Board's role.

As drafted, the proposal would give the Commissioner authority to decide what is an emergency and what measures the Department should take in response. "Emergency" is not defined in the proposed amendments and the scope of the Commissioner's response is not limited in any way, giving the Commissioner complete and unilateral authority to act.

The legislature gives the Board the authority to regulate the fish and wildlife of Vermont, including but not limited to promulgating rules pertaining to big game hunting. **Conversely, the role of the Commissioner is largely administrative.** The proposed amendments would take the Board's authority to regulate the manner in which big game kills are reported to the Department and delegate that authority to the Commissioner, contrary to the regulatory regime established by the legislature!

The proposed amendments, as drafted, reach far beyond the Board's stated goal of "modernizing" Vermont's reporting requirements to allow electronic reporting of animals killed by hunters. On the 8/24 Zoom webinar, Chris Bernier, turkey biologist for VTFWD, stated that the new online reporting is based on hunter convenience and allows greater hunting opportunity – **how about what's best for the wildlife?** We are concerned that electronic reporting may increase the opportunity for some hunters to evade compliance with the statutes and regulations. We are also concerned that the proposed amendments are overly broad and allow the Commissioner to "authorize a person taking big game to report in **any manner** including but not limited to; electronic reporting, in-person reporting, **and waiving exhibition of the carcass** unless requested by a warden" {emphasis added.}

Protect Our Wildlife

802.253.1592 [www.ProtectOurWildlifeVT.org](http://www.ProtectOurWildlifeVT.org)

August 25, 2020. I am writing to provide public comment on the regulation proposal on the reporting of big game. I am opposed to both proposals because they extend beyond the Board's authority to delegate its responsibilities. Both proposals are unnecessary and do not provide a clear understanding of an emergency. Online reporting could easily allow for inaccurate information. In person reporting of a kill should be required for all big game that our killed in Vermont.

Thank you, Wendy Lamphere

Vermont Fish & Wildlife Department:

I am writing to provide public comment on the regulation proposal on reporting of big game. I oppose both proposals because they extend beyond the Board's authority to delegate its responsibilities. Both proposals are unnecessary and overly broad, including the lack of what constitutes an "emergency." In addition, online reporting allows unethical hunters to submit inaccurate information that may skew the biologists' data. In-person reporting should be required for all big game that are killed.

Sincerely yours,

George H. Helmer

[REDACTED]

Woodstock, VT 05091

[REDACTED]

As you walk upon our sacred Mother Earth, treat each step as a prayer. ~ NICHOLAS BLACK ELK

I am writing to provide public comment on the regulation proposal on reporting of big game. I oppose both proposals because they extend beyond the Board's authority to delegate its responsibilities. Both proposals are unnecessary and overly broad, including the lack of what constitutes an "emergency." In addition, online reporting allows unethical hunters to submit inaccurate information that may skew the biologists' data. In-person reporting should be required for all big game that are killed.

Thank you for listening.

Bonnie Haselton

[REDACTED]

S Burlington VT 05403

[REDACTED]

[REDACTED]

Protect OUR WILDLIFE VT has suggested the following comments - and I totally agree -

I am writing to provide public comment on the regulation proposal on reporting of big game.

I oppose both proposals because they extend beyond the Board's authority to delegate its responsibilities.

Both proposals are unnecessary and overly broad, including the lack of what constitutes an "emergency."

I BELIEVE FISH & WILDLIFE SHOULD BE WORKING WITH MAJOR INPUT FROM PROTECT OUR WILDLIFE VT.

Someone needs to represent the "big game" ... !!!

Thanks -

Evelyn Wermer Frey



Stowe, VT 05672-0584

Dear F&W-

This is Michael Kolsun from Island Pond. I attended last evenings Zoom meeting and wanted to comment on the Turkey shot size regulation changes. Chris Bernier's presentation really did a fine job of the history and current status of Vermont's turkeys.

Those of us who have hunted Turkeys from the very beginning of the season, knew and understood the shot size regulations & restrictions at that time. Ethical hunters always want a quick and effective harvest. Shot size, patterns and self discipline were critical.

Ammunition technology in 2020, compared to the 70's, has made huge advances. We'd never think of using #9 lead shot back in the beginning, but now with TSS shot development, patterns and energy, even out of a .410 shotgun, are equally if not more effective than a 12 gauge. It's not unusual to have over 100 pellets in a three inch circle with a tight turkey choke.

I just wanted to clarify this point to any hunters who are not aware of the new advances in ammunition. As we continue to reach out to adult hunters who didn't grow up in the shooting sports, smaller gauges like a .410, in a semi-auto are now a very effective choice, especially for anyone who is recoil shy.

I want to thank the entire F&W Department staff for your dedication and hard work. A job well done.

Sincerely,

Michael Kolsun

Island Pond, Vermont



This is my public comment regarding the proposed big game reporting rule changes:

As regarding big game reporting rule changes, I stand in opposition to both proposals. From my reading of the proposals, the proposals go further than the Board has the authority to delegate its responsibilities. The proposals don't define what an "emergency" might be, a necessary consideration when it comes to killing wildlife.

The lack of definition contributes to making the proposals overly broad, and hence, unnecessary.

Thank you for considering my request,

Bonnie Duncan

[REDACTED]

Hyde Park, VT 05655

I am writing to provide public comment on the regulation proposal on reporting of big game. I oppose both proposals because they extend beyond the Board's authority to delegate its responsibilities. Both proposals are unnecessary and overly broad, including the lack of what constitutes an "emergency." In addition, online reporting allows unethical hunters to submit inaccurate information that may skew the biologists' data. In-person reporting should be required for all big game that are killed.

Peggy W Larson, DVM MS JD

Williston, VT. 05495

I am writing to provide public comment on the regulation proposal on reporting of big game. I oppose both proposals because they extend beyond the Board's authority to delegate its responsibilities. Both proposals are unnecessary and overly broad, including the lack of what constitutes an "emergency." In addition, online reporting allows unethical hunters to submit inaccurate information that may skew the biologists' data. In-person reporting should be required for all big game that are killed.

[REDACTED]

I attended the online event last night but wanted to send in my comment. I oppose both proposals because they extend beyond the Board's authority to delegate its responsibilities. Both proposals are unnecessary and overly broad, including the lack of what constitutes an "emergency." I also believe that it is irresponsible to not require hunters to bring their big game to check in stations. If they are going to kill big game they should be required to authenticate their reporting otherwise it could lead to instances of folks NOT reporting, exaggerating their reporting or just being inaccurate AND it prevents the biologists from retrieving what they described last night as critical information on the health of the species.

Holly Tippet Panton, VT

I am writing to provide public comment on the regulation proposal on reporting of big game. I oppose both proposals because they extend beyond the Board's authority to delegate its responsibilities. Both proposals are unnecessary and overly broad, including the lack of what constitutes an "emergency."

Kim Dreslin [REDACTED]

Sent from my iPhone

I am writing to provide public comment on the regulation proposal on reporting of big game. I oppose both proposals because they extend beyond the Board's authority to delegate its responsibilities. Both proposals are unnecessary and overly broad, including the lack of what constitutes an "emergency."

Lewis Clark

[REDACTED]

Putney VT 05346

[REDACTED]

I am writing to provide public comment on the regulation proposal on reporting of big game. I oppose both proposals because they extend beyond the Board's authority to delegate its responsibilities. Both proposals are unnecessary and overly broad, including the lack of what constitutes an "emergency." The commissioner and the fish and wildlife board does not need more power. They need more restraint and accountability. They have made poor choices that goes against the majority and tax paying Vermonters. Thank you for your time.

Jeff Beaupre Essex Vermont

I am writing to provide public comment on the regulation proposal on reporting of big game. I oppose both proposals because they extend beyond the Board's authority to delegate its responsibilities. Both proposals are unnecessary and overly broad, including the lack of what constitutes an "emergency."

Marilyn Donovan DVM

[REDACTED]

Weston VT 05161

I am writing to provide public comment on the regulation proposal on reporting of big game. I oppose both proposals because they extend beyond the Board's authority to delegate its responsibilities. Both proposals are unnecessary and overly broad, including the lack of what constitutes an "emergency."

-Jeremy Frederick

Fletcher, VT

This is my comment on the regulation proposal on reporting of "big game". What and where is the boards authority to delegate it's responsibility? What constitutes an "emergency"? Where is the "Boards" authority written to delegate it's responsibility?

Ann Broekhuizen Jericho, VT

Dear F&W Board:

I am writing to provide public comment on the regulation proposal on reporting of big game. I oppose both proposals because they extend beyond the Board's authority to delegate its responsibilities. Both proposals are unnecessary and overly broad, including the lack of what constitutes an "emergency."

With concerned urgency,

Dr. Catherine Bodnar

I am writing to provide public comment on the regulation proposal on reporting of big game. I oppose both proposals because they extend beyond the Board's authority to delegate its responsibilities. Both proposals are unnecessary and overly broad, including the lack of what constitutes an "emergency."

Bonnie Bean

Hello, my name is Kelly Wicker. I am writing to provide public comment on the regulation proposal on reporting of big game. I oppose both proposals because they extend beyond the Board's authority to delegate its responsibilities. Both proposals are unnecessary and overly broad, including the lack of what constitutes an "emergency."

When it comes Vermont's wildlife population, I feel it is best to have oversight by numerous knowledgeable individuals because that provides checks and balances and provides room for questions and answers.

Thanks for listening!

Kelly in Windham

I am writing to provide public comment on the regulation proposal on reporting of big game. I oppose both proposals because they extend beyond the Board's authority to delegate its responsibilities. Both proposals are unnecessary and overly broad, including the lack of what constitutes an "emergency."

Julie

Julie Dragon, Ph.D.

Assistant Professor, Microbiology & Molecular Genetics

Director, Vermont Integrative Genomics Resource (pronouns she/her)

95 Carrigan Dr., 201 Stafford Hall (postal), 306 HSRF (physical)

University of Vermont

Burlington, VT 05405

[REDACTED]

<http://www.uvm.edu/medicine/bsr/>



I am writing to provide public comment on the regulation proposal on reporting of big game. I oppose both proposals because they extend beyond the Board's authority to delegate its responsibilities. Both proposals are unnecessary and overly broad, including the lack of what constitutes an "emergency."

Brenda Altman

[REDACTED]

Dear Sir/Madame;

I am writing to provide public comment on the regulation proposal on reporting of big game. I oppose both proposals because they extend beyond the Board's authority to delegate its responsibilities. Both proposals are unnecessary and overly broad, including the lack of what constitutes an "emergency."

Andrea Chiesa

Lyndonville resident

Sent from my iPhone

I am writing to provide public comment on the regulation proposal on reporting of big game. I oppose both proposals because they extend beyond the Board's authority to delegate its responsibilities. Both proposals are unnecessary and overly broad, including the lack of what constitutes an "emergency."

More Info

The legislature gives the Board the authority to regulate the fish and wildlife of Vermont, including but not limited to promulgating rules pertaining to big game hunting. Conversely, the role of the Commissioner is largely administrative. The proposed amendments would take the Board's authority to regulate the manner in which big game kills are reported to the Department and delegate that authority to the Commissioner, contrary to the regulatory regime established by the legislature!

The proposed amendments, as drafted, reach far beyond the Board's stated goal of "modernizing" Vermont's reporting requirements to allow electronic reporting of animals killed by hunters. While we are concerned that electronic reporting will increase the opportunity for some hunters to evade compliance with the statutes and regulations pertaining to hunting, the proposed amendments are overly broad and allow the Commissioner to "authorize a person taking big game to report in any manner including but not limited to; electronic reporting, in-person reporting, and waiving exhibition of the carcass unless requested by a warden" {emphasis added.} If the purpose of the amendment is truly to ease the burden on hunters by authorizing electronic reporting, then there is no reason for this broad grant of authority to the Commissioner.

Regards,

Nancy Borg

I am writing to oppose the proposed regulation on big game reporting. Hunters should be required to report their kills in person. This is in the best interest of collecting solid data that can only be obtained in-person. Also, the current proposal gives the Commissioner too much power and challenges the purpose of the Fish & Wildlife Board.

Thank you,

Gretchen Eberle

I am writing to oppose the proposed regulation on big game reporting. Hunters should be required to report their kills in person. This is in the best interest of collecting solid data that can only be obtained in-person. Also, the current proposal gives the Commissioner too much power and challenges the purpose of the Fish & Wildlife Board.

Thank you for your time,

Erin Niles

Sent from Yahoo Mail on Android

With online reporting, Porter said, "you get some data but not as much." Individual hunters might not have a proper scale for weighing an animal carcass or the tools to determine an animal's age.\*

So, this is less about managing wildlife with science and more about saving the budget by offering convenient reporting options for hunters.

Ridiculous.

The revenue loss should have been accounted for in the department's budget and new revenue streams should have been created. This is gross mismanagement of our wildlife and of our tax dollars. This department needs a leadership overhaul.

\*[https://vtdigger.org/2020/08/26/state-looks-for-ways-to-attract-more-hunters-including-novice-weekend/?fbclid=IwAR3uHkbKdQmE\\_jTgdmu7h8rJ43xj3k6BJawvhcb1PLO4NuCuoY-FheAqoMA](https://vtdigger.org/2020/08/26/state-looks-for-ways-to-attract-more-hunters-including-novice-weekend/?fbclid=IwAR3uHkbKdQmE_jTgdmu7h8rJ43xj3k6BJawvhcb1PLO4NuCuoY-FheAqoMA)

Sincerely,

Jen Kittell

Lamoille County

I am writing to oppose the proposed regulation on big game reporting. Hunters should be required to report their kills in person. This is in the best interest of collecting solid data that can only be obtained in-person. Also, the current proposal gives the Commissioner too much power and challenges the purpose of the Fish & Wildlife Board.

Please deny this proposal.

Kerry and William Edmunds

[REDACTED]

Craftsbury Common, VT 05827

I am writing to oppose the proposed regulation on big game reporting. Hunters should be required to report their kills in person. This is in the best interest of collecting solid data that can only be obtained in-person. Also, the current proposal gives the Commissioner too much power and challenges the purpose of the Fish & Wildlife Board.

Sally O'Neil

Good day,

I am writing to provide public comment on the regulation proposal on reporting of big game. I oppose both proposals because they extend beyond the Board's authority to delegate its responsibilities. Both proposals are unnecessary and overly broad, including the lack of what constitutes an "emergency." In addition, online reporting allows unethical hunters to submit inaccurate information that may skew the biologists' data. In-person reporting should be required for all big game that are killed.

The opinions of what constitutes an emergency would be subjective and the decisions and inaccuracies do not hold hunter responsible in their online reporting. Once again hunters are given far too much power at the expense fo wildlife.

Thank you for your time.

Kate Kenner in Guilford

I am writing to provide public comment on the regulation proposal on reporting of big game. I oppose both proposals because they extend beyond the Board's authority to delegate its responsibilities. Both proposals are unnecessary and overly broad, including the lack of what constitutes an "emergency." In addition, online reporting allows unethical hunters to submit inaccurate information that may skew the biologists' data. In-person reporting should be required for all big game that are killed.

Sincerely,

Colleen Schuster

Bristol, VT

Dear Agency of Natural Resources,

I'm a constituent from Marshfield writing to provide public comment regarding the proposed regulation amendments by the Fish and Wildlife Board to the reporting of big game. I OPPOSE both proposals.

As drafted, these amendments are far outside the stated goal of the Board to 'modernize' the reporting of big game in the state, specifically to allow electronic reporting of animals killed by hunters. They also extend beyond the Board's authority to delegate its responsibilities.

The proposed amendments would take the Board's authority to regulate the manner in which big game kills are reported to the Department and delegate that authority to the Commissioner, whose position is designed to be an administrative one. This is in direct conflict with the regulatory rules established by the legislature, instead granting the Commissioner unfettered discretion to determine the manner in which big game, other than moose and bear, are reported to the Department after the animals are killed.

A second part of the proposed regulation would also give the Commissioner unilateral authority to weaken the strict reporting requirements for moose and bear in the case of an undefined "emergency". The Board retains the authority to promulgate emergency rules and used that authority with regard to turkey hunting in April due to COVID-19. There is no need or purpose for the Commissioner to usurp the Board's role in these situations.

"Emergency" is not clearly defined in the proposed amendments and the scope of the Commissioner's response is not limited in any way. Hence, the Commissioner would have complete and unilateral authority to decide what is an "emergency", what measures the Department should take in response, and act on that decision.

For these reasons, I oppose both proposals because they extend beyond the Board's authority to delegate its responsibilities. They are unnecessary and overly broad, including the lack of what constitutes an "emergency", and grant authority to the Commissioner well beyond the scope of that position's duties.

Thank you for considering my comment.

Anne Jameson,

Marshfield

I am writing to provide public comment on the regulation proposal on reporting of big game. I oppose both proposals because they extend beyond the Board's authority to delegate its responsibilities. Both proposals are unnecessary and overly broad, including the lack of what constitutes an "emergency." In addition, online reporting allows unethical hunters to submit inaccurate information that may skew the biologists' data. In-person reporting should be required for all big game that are killed.

Sincerely,

Lucy Goodrum

██████████



Reading, VT 05062



I am writing to provide public comment on the regulation proposal on reporting of big game. I oppose both proposals because they extend beyond the Board's authority to delegate its responsibilities. Both proposals are unnecessary and overly broad, including the lack of what constitutes an "emergency." In addition, online reporting allows unethical hunters to submit inaccurate information that may skew the biologists' data. In-person reporting should be required for all big game that are killed.

The legislature gives the Board the authority to regulate the fish and wildlife of Vermont, including but not limited to promulgating rules pertaining to big game hunting, while the role of the Commissioner is largely administrative. The proposed amendments would take the Board's authority to regulate the manner in which big game kills are reported to the Department and delegate that authority to the Commissioner, contrary to the regulatory regime established by the legislature.

Sincerely,

Janice Nadworny

Hinesburg

I am writing to provide public comment on the regulation proposal on reporting of big game. I oppose both proposals because they extend beyond the Board's authority to delegate its responsibilities. Both proposals are unnecessary and overly broad, including the lack of what constitutes an "emergency." In addition, online reporting of big game invites unethical and untruthful data to be submitted by unethical hunters. If someone kills a deer or other "big game" animal, the least they should have to do is take the animal to a check station!

Thank you,

Jennifer Lovett

Starksboro, VT

To whom it may concern:

I am writing on behalf of our Vermont coalition members from across the state on the Department's proposal to change the reporting requirements on big game. The Department's goal for these rule changes is to provide greater hunter convenience and opportunity.

Our position is the following:

1.) We oppose online reporting for all big game. Even Commissioner Porter shared concerns in an interview with VTDIGGER that online reporting presents some challenges. Per the interview, “However, shifting away from in-person reporting could have some downsides for data, Porter said. “It’s always a balancing act between the difficulty and inconvenience and expense of having people drive ... versus the quality of data you get,” the commissioner said.

At official check stations, state biologists can do things like examine tooth wear and make determinations about the health of an animal. At designated stations, the state may get slightly shallower data.

With online reporting, Porter said, “you get some data but not as much.” Individual hunters might not have a proper scale for weighing an animal carcass or the tools to determine an animal’s age.”

2.) The authority that the Commissioner is seeking already lies with the Fish & Wildlife Board, so the proposed rule changes appear to be arbitrary and unnecessary. The legislature gives the Board the authority to regulate the fish and wildlife of Vermont, including but not limited to promulgating rules pertaining to big game hunting. Conversely, the role of the Commissioner is largely administrative. The proposed amendments would take the Board’s authority to regulate the manner in which big game kills are reported to the Department and delegate that authority to the Commissioner, contrary to the regulatory regime established by the legislature!

3.) The Commissioner is seeking to be able to lift the strict reporting requirements for bear and moose in the event of an emergency, but there is no definition of what constitutes an emergency. Also, the Board already has authority to change reporting requirements, as it did with the May turkey hunt and allowed online reporting due to the Governor’s emergency action on COVID19.

We understand that LCAR makes its decisions on a proposed rule using certain criteria. We believe LCAR should oppose this rule based on the following: (1) a proposed rule is beyond the authority of the agency; (2) a proposed rule is contrary to the intent of the legislature; (3) a proposed rule is arbitrary

It seems as though this Commissioner continues to seek more and more power without providing the necessary justification, as we saw earlier this year with bill S.321, that was thankfully defeated by the Senate Committee on Natural Resources. Despite the current challenges with the Fish & Wildlife Board (that’s composed of all hunters, anglers and trappers), the Board at least provides the illusion of democracy and public participation. Giving unfettered control to one party – the Commissioner – is not in the best interest of Vermonters or democracy.

Jane Fitzwilliam

VCCC Lead, Putney VT

To Agency of Natural Resources,

I’ve lived in Vermont for nearly 50 years and I have never felt like the Fish and Wildlife Department listened at all to those of us who enjoy wildlife without hunting them. And so I am passing along this public comment, with which I totally agree, in the hope that you will see fit to reign in F&W and include other voices in the management of Vermont’s wildlife.

I am writing to provide public comment on the regulation proposal on reporting of big game. I oppose both proposals because they extend beyond the Board's authority to delegate its responsibilities. Both proposals are unnecessary and overly broad, including the lack of what constitutes an "emergency." In addition, online reporting allows unethical hunters to submit inaccurate information that may skew the biologists' data. In-person reporting should be required for all big game that are killed.

Respectfully,

Dottie Nelson

Middlebury

I am writing to oppose the proposed regulation on big game reporting. Hunters should be required to report their kills in person. This is in the best interest of collecting solid data that can only be obtained in-person. Also, the current proposal gives the Commissioner too much power and challenges the purpose of the Fish & Wildlife Board.

Brian C Jones 1organicjones@gmail.com

Hello. I am writing to provide public comment on the regulation proposal on reporting of big game. I oppose both proposals because they extend beyond the Board's authority to delegate its responsibilities. Both proposals are unnecessary and overly broad, including the lack of what constitutes an "emergency." I believe the Vermont FW board is already far too cozy with Commissioner Porter. The amount of cronyism that goes on is breathtaking and it has eroded the trust of the Fish and Wildlife Department with the general public. They are desperately clinging to a bygone era that no longer exists in our state. To give Commissioner Porter even more power, which is already too much, is a grave mistake and will break the last fragile strand of trust that exists with the public.

Dan Galdenzi

Stowe Vermont

██████████

Sent from my iPad

I am writing to provide public comment on the regulation proposal on reporting of big game. I oppose both proposals because they extend beyond the Board's authority to delegate its responsibilities. Both proposals are unnecessary and overly broad, including the lack of what constitutes an "emergency." In addition, online reporting allows unethical hunters to submit inaccurate information that may skew the biologists' data. In-person reporting should be required for all big game that are killed.

Diana Salyer

Randolph, VT

I agree with more flexibility. This would be a good change.

Chad horridbastard@gmail.com

I am writing to provide public comment on the regulation proposal on reporting of big game. I oppose both proposals because they extend beyond the Board's authority to delegate its responsibilities. Both proposals are unnecessary and overly broad, including the lack of what constitutes an "emergency." In addition, online reporting allows unethical hunters to submit inaccurate information that may skew the biologists' data. In-person reporting should be required for all big game that are killed.

Geryll Robinson

Goshen VT

You are here. You are now.

To whom it may concern:

I am writing to provide public comment on the regulation proposal on reporting of big game. I oppose both proposals because they extend beyond the Board's authority to delegate its responsibilities. Both proposals are unnecessary and overly broad, including the lack of what constitutes an "emergency." In addition, online reporting allows unethical hunters to submit inaccurate information that may skew the biologists' data. In-person reporting should be required for all big game that are killed.

Sincerely,

Leigh Steele

Burlington

I think it is a bad idea to make it easier for hunters. There are too many bad hunters out there. Why take away business from the locally owned store? Is this just to boost your numbers? Think of the small business owners who benefits from sales of purchases from those hunters. Also, bear season should not be so long and should be cut down to every other year. The cubs are still depending on the mom come September 1st. I live where a lot of bears are and they are harmless, just hungry. Compost law made it worst for their actions. MOST hunters will shoot a bear no matter what size and of course using a dog to chase them up a tree and trap them there is allowed(shameful Vermont). I see horror from hunters the last 30 years I have lived on our property. My property is posted but they still try and hunt on it, guess they can't read. If I could prosecute them I would.

Sent from my iPhone

Dianne Dashnow

The idea of online reporting is crazy. People gonna give the department accurate data such as a 3 point 110 lb buck will be reported as a 5 point 150 lb buck which would be conveyed as a 2.5 year old when it's really only 1.5. Also going to the check station is a ritual that has always been around. Most check station attendants I know look forward to deer season when they can weigh deer and get the pictures for their walls or scrap book.

Cory Curtis [REDACTED]

I'd like to offer my public comment on the regulation proposal concerning the reporting of big game. I strongly oppose both proposals as they extend beyond the Board's authority to delegate its responsibilities. Both proposals are unnecessary and overly broad, including the lack of what constitutes an "emergency" and invite "creative" interpretation of rules and regulations that would favor hunters and disadvantage wildlife.

Thank you for taking my comment into consideration.

Respectfully,

Richard Fitzhenry

Hyde Park

I am writing to provide public comment on the regulation proposal on reporting of big game. I oppose both proposals because they extend beyond the Board's authority to delegate its responsibilities. Both proposals are unnecessary and overly broad, including the lack of what constitutes an "emergency."

After reading the proposal, I feel that not reporting big game kills in person, with diligent oversight, may let some hunters to evade compliance with the statutes and regulations that govern their kills.

Why should the Commissioner have the authority to regulate the manner in which big game kills are reported to the Department? Is this function now considered Administrative instead of a Board function?

Pat Monteferrante Stowe, VT

Dear Fish & Wildlife Department:

I am writing to provide public comment on the regulation proposal for reporting big game. I oppose both proposals because they extend beyond the Board's authority to delegate its responsibilities. Allowing the Commissioner to "authorize a person taking big game to report in any manner" goes well beyond what is reasonable to ease the alleged reporting burden on hunters. Already, the move to electronic reporting opens up opportunities for hunters to evade compliance with the statutes and regulations. The Department has already shown a practice of selective enforcement of the laws. Often incidents aren't even investigated and enforcement measures are not applied. This broad authority is

begging for more of the same. Both proposals are unnecessary and overly broad and I oppose the changes.

Sincerely,

Kristen Cameron

Burlington, VT

I am writing to oppose the proposed rule changes on the reporting of big game for the following reasons: the Commissioner is seeking authority that already lies with the Board; online reporting means less data available for biologists, a concern that even the Commissioner shared in an interview with VTDIGGER last week; online reporting invites unethical hunters to report inaccurate info with zero safeguards in place; the term "emergency" is undefined. The rule changes proposed are arbitrary and unnecessary.

With regard to the ability to respond to an emergency, such as the current pandemic, a successful response requires coordination between the Governor's office and his/her administration and the legislature. The proposed amendments appear to be contrary to the clear intent of the legislature to entrust the Board with regulatory powers over hunting and, similarly, may extend beyond the Board's authority to delegate its responsibilities. The Department should have to explain to the legislature why they are seeking to obtain power that has been granted to the FW Board.

This rule-making process is another example of Government waste of our tax dollars.

Brenna Galdenzi

Stowe VT

Dear Big Game Team,

First of all I would like to say that I support the proposed changes to the turkey regulations. I feel that anytime a regulation change is made that would increase hunter participation is a good thing. I am extremely in favor about being able to report a turkey electronically.

I just watched the presentation that was given to the Fish & Wildlife Board in May and was informed that the majority of hunters (53%) who responded to a survey that was sent out were in favor of having the spring turkey hunting hours extended. I do not see anywhere where the Big Game Team is making any recommendations to the board to do so.

I know there were some concerns from the department staff when there was talk about extending the hunting hours for the spring youth turkey weekend. I would like to give you my thoughts on some of those concerns as they would apply to all day hunting during the May turkey season.

The first being "Roost shooting". I know there were concerns that if spring turkey hunting season were to be changed to all day hunting that there may be an issue with hunters shooting turkeys off the roost. What is there now to stop hunters from shooting a turkey off the roost during the current hunting hours? It does happen! I have had two different hunters in the past tell me that was the way they harvested their spring turkey. Although I feel that this is not ethical it is not illegal without a regulation change that would prohibit such conduct.

The second is landowner concern. If I am not mistaken Vermont's spring turkey season is the only game season that is not an all day season. Landowners that open their land to hunting know that hunters could possibly be on their property throughout the day in pursuit of game. I feel that landowners would not have anymore of an issue with spring turkey hunters being on their property throughout the day than they would with fall turkey, deer and small game hunters.

Thirdly, is the disturbance of nesting hens. It has been proven that the longer a hen is on the nest incubating the less likely she is to abandon the nest. If she were to abandon her nest the spring hunting season is set early enough in the year that most likely she will re-nest. Re-nesting occurs every year whether the nest is destroyed by predators or the hens abandons it for some reason or another. Data from other states( see attached) that allow all day hunting have found that approximately 80% of turkeys harvested are done so by noon. That tells me that the majority of hunters would be out of the woods by that time which would result in minimal additional nest disturbance by the small numbers of hunters who would continue to hunt past noon.

I have also heard concerns that there would be interference between hunters actually hunting turkeys and those trying to roost a turkey. I think that if the Vermont's spring turkey hunting hours were to be changed to sunset that most turkey hunters would be out hunting and not trying to roost a turkey.

Extending the spring hunting hours would benefit a large group of hunters to include 1st and 3rd shift workers as well as young hunters who would like to hunt after school. Not all individuals are fortunate enough to have ample vacation time from work where they can afford to take time off during the turkey season which would limit them to being able to only hunt weekends. This would apply to youth who are attending school as well with the current hours in place. A study done in 2002 in the state of Indiana found that a higher proportion of youth license holders actually hunted turkeys during the first spring of all-day hunting season compared to the previous five years of half-day hunting. (See attachment)

If extending the spring turkey hunting hours would be detrimental to the turkey population I would be the first to be against extending the hunting hours. Research has shown that it is not. Research has also shown that the spring harvest during an all-day season only increases 10-15% which is minimal.

I would like to see Chris Bernier reach out to some of the other states (approx. 40) that have all day spring turkey hunting of some length and see if any of the concerns I mentioned or others that the Big Game Team may have are an issue.

In reviewing the 2020-2030 draft of Vermont's Wild Turkey Management Plan it states that it's goal is to maximize ecological and social benefits derived from Vermont's wild turkey population by administering biologically appropriate and sustainable harvest regulations. I hope that the Big Game team along with department staff realizes that there is no negative biological reason for not increasing the spring turkey hunting hours and that there is a social reason in doing so by increasing hunter opportunity. Again I

would like to stress that the majority of hunters that responded to the department's survey are in favor of expanding the spring turkey hunting hours.

Sincerely, Don Isabelle

See attachments below:

***An Evaluation of All-day Hunting - Comparisons between Half-day and All-day Spring Turkey Hunting in Indiana (Backs 2005)***

In 2002, all-day spring turkey hunting was implemented in Indiana after 32 years of half-day hunting. Indiana has a statewide, open-permit, spring turkey season with a bag-limit of 1 male or bearded turkey per hunter per season. Prior to permitting all-day spring turkey hunting in Indiana, a moderate amount of controversy existed among various resource users and natural resource managers. Among these concerns were that all-day hunting might lead to an even greater proportion of harvest occurring earlier in the season, and that all-day hunting would result in a greater proportion of adult gobblers being harvested. To evaluate the impacts of all-day spring turkey, a study was conducted (Backs 2005), the objective of which was to assess whether lengthening of spring shooting hours from half-day (half-hour before sunrise to 12:00 PM) to all-day (half-hour before sunrise to sunset) influenced the distribution of the harvest throughout the season or the age-specific harvest on adult gobblers.

Study results indicated that daily harvest distributions through the 19-day spring seasons did not differ following the extension of shooting hours. The proportion of total harvest that occurred during the third week of the season was slightly less (3%) during years in which all-day hunting was permitted. Results of the study also indicated that the proportion of the harvest taken after 12:00 PM during all-day hunting was approximately 20% (Fig. 3). The primary differences between the half-day and all-day season was that adult gobblers composed slightly greater proportions (>2%) of all-day harvests; however, the author concluded that the differences may have been due to a greater number of adult gobblers being available during the all-day seasons.

6

as well as unmeasured variables of hunter selectivity. The author stated that the afternoon time periods, especially after 3:00 PM during weekdays, may have attracted hunters that previously could only hunt on weekend mornings (e.g., youth, first and third shift factory workers). In support, results of hunter mail surveys indicated a noticeably higher proportion of youth license holders actually hunted turkeys during the first spring of all-day hunting compared to the previous five years of half-day hunting.

Results of the study indicated that the influence of all-day hunting on the distribution of harvest throughout the season and the age-specific harvest of adult gobblers was minimal. There was no change in the daily distribution of harvest and most birds were still taken during the morning (70% prior to 10:00 AM, 80% by 12:00 PM) (Fig. 3). The slightly greater take of adult gobblers was probably related to higher relative turkey population levels and hunter selectivity rather than shooting hours. The author did caution that differential adult gobbler harvest may increase under more liberal harvest management strategies, and perhaps act synergistically with other factors to increase hunting mortality of adult gobblers; however, the implementation of all-day hunting in Indiana provides additional and new hunting opportunities without noticeable impacts on the statewide harvest structure and estimated hunter success.





### Distribution of Spring Turkey Harvest by Time of Day in Ohio - 2010

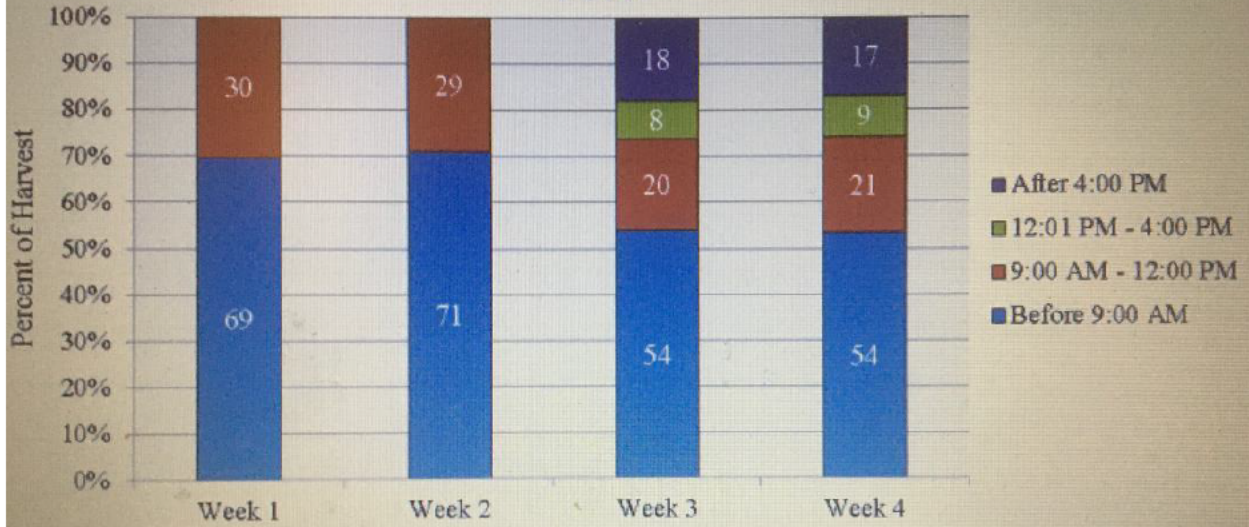
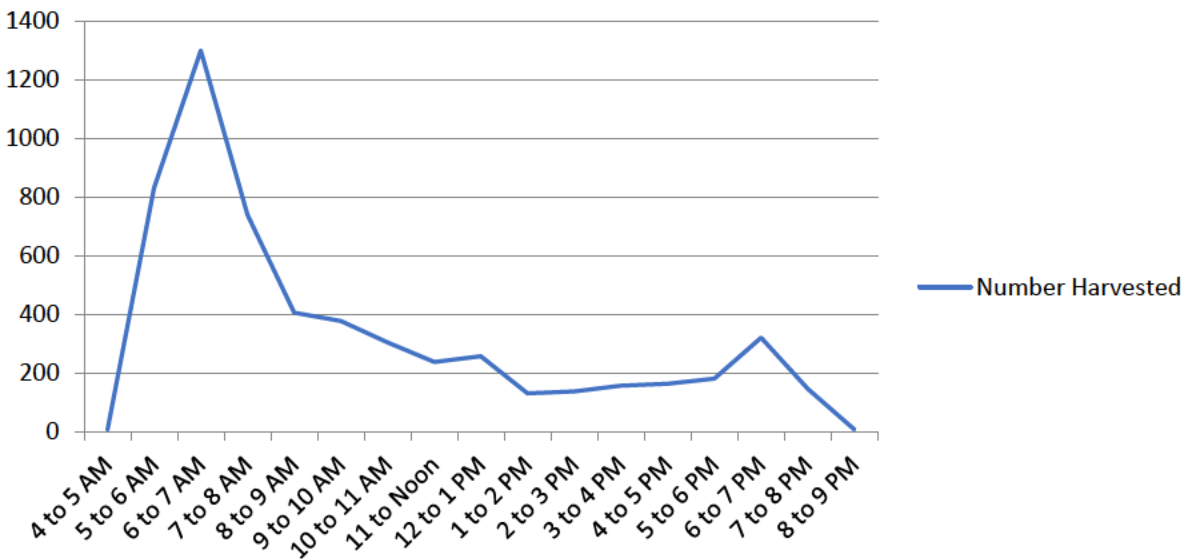
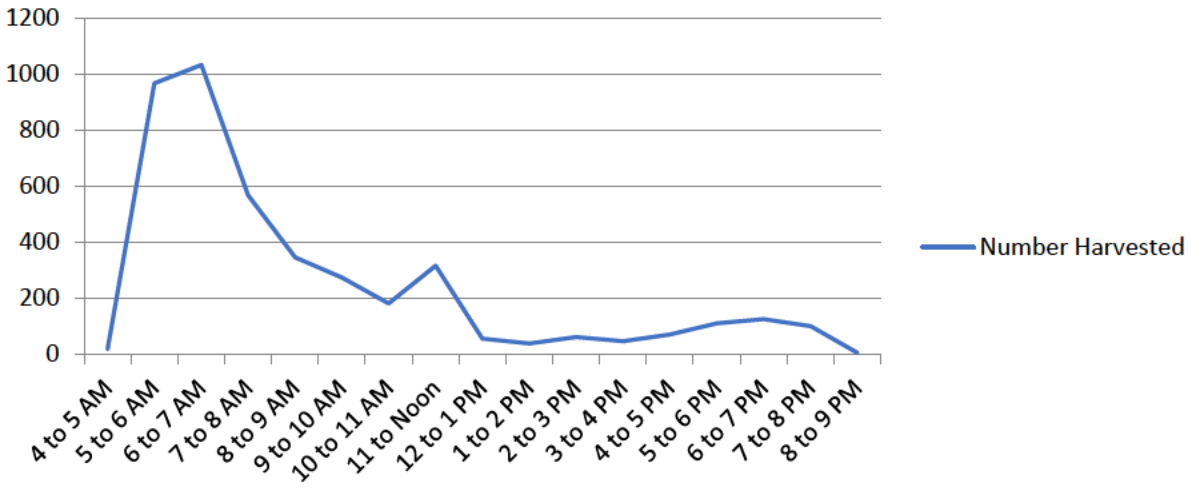


Figure 4. Distribution of spring turkey harvest by time of day in Ohio. During the first 2 weeks of the 2010 spring turkey, hunting was permitted until 12:00 PM. During the last 2 weeks of the season, hunting was permitted until sunset. Ohio Department of Natural Resources – Division of Wildlife.

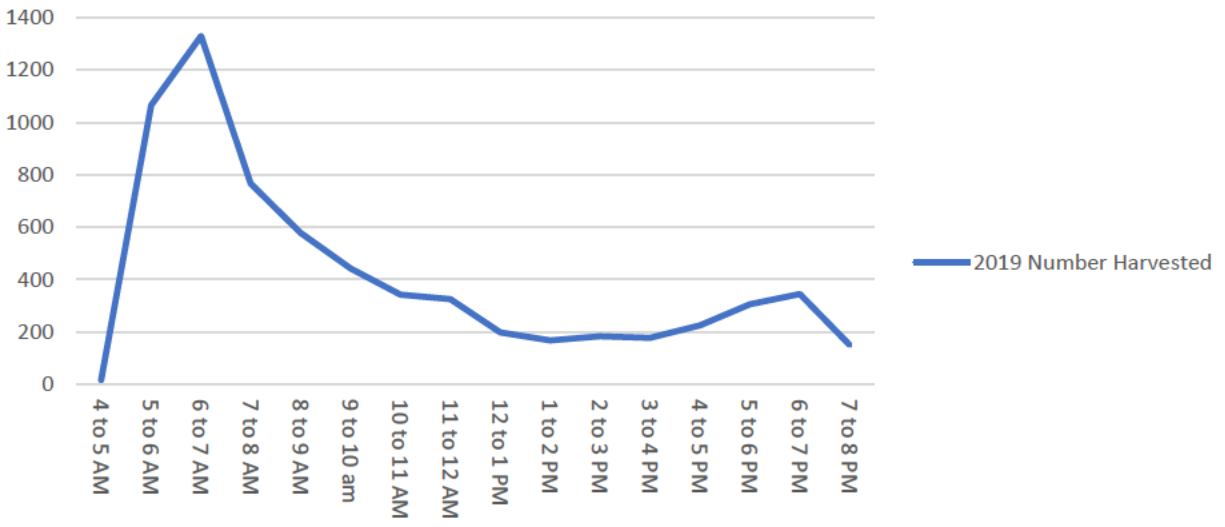
### Maine Spring 2014 wild turkey harvest by hour of day



### Maine Spring 2015 wild turkey harvest by hour of day



### Maine Spring 2019 wild turkey harvest by hour of day



Maine Spring Wild Turkey Harvest from 2007 to 2019												
2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
6085	6348	6075	6078	5448	6084	6704	5779	5272	5852	5597	6236	6612

Good morning,

I am writing to provide public comment on the regulation proposal on reporting of big game. I oppose both proposals because they extend beyond the Board's authority to delegate its responsibilities. Both proposals are unnecessary and overly broad, including the lack of what constitutes an "emergency."

Regards,

Leslie Blow

Middlebury

Dear Fish & Wildlife Board,

As a lifelong hunter, I greatly welcome the proposed rule change on electronic harvest reporting of certain game species. I recognize the value for both biologists and game wardens of collecting harvest information, but I am also wary of COVID-related issues at check-in locations this fall. In much the same way that electronic licenses are permitted in Vermont, e.g., digital PDF on an iPhone, this change would modernize an important aspect of hunting in Vermont with no deleterious effects.

Thank you,

Justin St. James

Essex, VT

I am writing to provide public comment on the regulation proposal on reporting of big game. I oppose both proposals because they extend beyond the Board's authority to delegate its responsibilities. Both proposals are unnecessary and overly broad, including the lack of what constitutes an "emergency." Please record my comments.

Thank you.

John Zelig

Burlington

Hi,

Regarding shot size, I strongly believe the minimum shot size requirement should be eliminated. It does not make sense to have this limit with the current popularity of tungsten shot, which is extremely effective at shot sizes smaller than the current limit and is also non-toxic.

Regarding the novice turkey weekend, I am more neutral. Clearly hunter recruitment is important but the turkey season is already a month long and current research has been illuminating the importance of

not killing toms too early in the breeding cycle. I'm not sure it makes sense to put additional pressure on the birds a week before the season despite the potential recruitment benefits.

Finally, I strongly believe there should be electronic reporting for deer and turkey. As an archery deer hunter, it is nearly impossible to get a deer killed in the evening to a check station before it closes. If it's a warm night waiting until morning to bring the deer to the check station has the strong potential for meat loss. Additionally, as a student residing in NH, I need to be able to check a deer or turkey in before crossing state lines. However, if I could check a deer in electronically this would not be an issue. This would also help hunters from out of state that want to hunt the evening before driving home without the stress of getting a deer checked in person before leaving the state.

A great example of a state with online reporting that I hunt is Missouri. They have an app that keeps your license and tags. You can notch your tag even if you don't have service and then provide the report on sex, antler circumference, eye to nose length of does, etc. once you have service. This gives Missouri up to the minute harvest information that they display to the public on their website. It would be great if Vermont could have something like this someday. In my opinion, conveniences such as online reporting will help hunter recruitment and hunter retainment more than things like novice weekends (not that those should not be considered either though).

Best,  
Andrew Nadler

I am writing to provide public comment on the regulation proposal on reporting of big game. I oppose both proposals because they extend beyond the Board's authority to delegate its responsibilities. Both proposals are unnecessary and overly broad, including the lack of what constitutes an "emergency." In addition, online reporting allows unethical hunters to submit inaccurate information that may skew the biologists' data.

In-person reporting should be required for all big game that are killed.

The general public needs to have a voice in matters concerning OUR wildlife management, conservation and stewardship. This is controlled by a small percentage of special interests and Commissioner Porter.

F and W receives 29% of its funding from license fees (in decline) and 25% from the general fund and that is revenue from Vermonters who are left out of the policy making process that impacts OUR wildlife. This is wrong and must be addressed.

If I have to purchase a hunting and fishing license to have a voice , I will do so.

Wildlife conservation and responsible stewardship therein does not seem to always be the objective of Mr. Porter et.al.

Kip Ross  
[REDACTED]  
Hyde Park, VT



## Forging a wildlife conservation model for the 21st century

September 1, 2020

Commissioner Porter and Fish & Wildlife Department Staff,

Thank you for the opportunity to comment on these three proposals:

- 1. Proposed regulation changes to amend the shot size restriction for turkey hunting: VWC agrees with the rationale and supports this change.*
- 2. Proposed regulation changes to create a novice turkey hunting weekend: VWC agrees with the goal of encouraging new hunters and supports this proposal.*
- 3. Proposed regulation changes to allow the Commissioner the authority to allow harvest reporting of deer and turkey electronically, by telephone or any other method and the authority to allow electronic harvest reporting of moose and/or bear in an emergency: While VWC understands and agrees with the use of electronic reporting during the Covid-19 pandemic and are willing to give it the benefit of the doubt with regard to turkeys after listening to Chris Bernier's presentation, we believe it would be a mistake to expand this to deer beyond the pandemic. Additionally, the term "emergencies," regarding allowing electronic reporting to bear and moose, is impossibly vague. Vague regulations invite chaos.*

The Department took quick and commendable action in dealing with the Covid-19 crisis during the spring turkey season and appreciate that a resurgence of the pandemic might require further steps of a similar nature. However, as of now, with appropriate safety measures in place and a low infection rate in the state, many if not most Vermont businesses have reopened. It seems arbitrary to somehow single out the businesses that host check-in stations as unsafe. While having to drive to a reporting station may be an in-the-moment, begrudged chore for those who do not have one nearby, it is hardly what is on one's mind when preparing for a deer hunt or buying a license. Consequently, there is a risk that any positive effect that not having to go to a reporting station after a successful hunt might have on encouraging new hunters or retaining current ones, will be outweighed by the degradation of the data obtained by the FWD with first-hand observation and measurements. For starters, not everyone can age a deer or bear and while it may be easy to weigh a turkey, a bear or big buck is more of a problem. Not everyone has suitable, or suitably accurate scales in the garage.

Again, thank you for the opportunity to weigh in (so to speak) on these issues.

Sincerely, the Board of the Vermont Wildlife Coalition: Rob Mullen, Jane Hoffman, Gerri Huck, David Kelley, Claudia Mucklow, and Leigh Steele

Vermont Wildlife Coalition • PO Box 987, Shelburne VT 05482 •  
[info@vtwildlifecoalition.org](mailto:info@vtwildlifecoalition.org)

Please log my public comments on the proposed big game reporting rule changes. I would like the Board to vote in favor of granting the Fish & Wildlife Department Commissioner the authority to waive the in-person game check-in requirement. The fast pace of COVID-19 developments mandate a flexible and nimble approach. The Commissioner is in a better position to act quickly and decisively to protect the health of Department staff, check station operators, and the public in response to changing information on infection rates. In addition, the Commissioner is a more appropriate entity to make decisions on the State's liability and responsibility to Department staff.

If the board feels strongly that granting the Commissioner this authority is excessive, I urge the board to do so for one year only, or to waive the reporting requirement themselves.

Thank you for your careful consideration.

Jodi Shippee

Duxbury, Vermont



September 1, 2020

Louis Porter, Commissioner  
Vermont Fish and Wildlife  
Department 1 National Life  
Drive  
Davis 2  
Montpelier, VT

05620 Dear

Commissioner

Porter,

The Vermont State Chapter of the National Wild Turkey Federation (NWTF-VT) appreciates the work of the Vermont Fish and Wildlife Department (VFWD) in managing a robust wild turkey population that provides fantastic hunting opportunities in Vermont. We offer the following comments in response to the Department's proposed regulation changes:

- We support the Department's elimination of the minimum shot size restriction on ammunition used for turkey hunting. Such changes will allow hunters in Vermont to take advantage of new and popular hunting loads that are available in smaller shot sizes but composed of heavier than lead materials, such as TSS #9, among others. In addition, we believe this regulation change will provide increased flexibility to hunters (especially women and youths) interested in hunting turkeys with smaller gauge shotguns, such as 20 ga. and .410, as they will be able to pair them with effective ammunition loads. However, we believe that the Department's maximum allowable shot size should be reduced from #2 to #4. In their final report released in 2005, the NWTF Wild Turkey Hunting Safety Task Force recommended restricting shot size to #4 and smaller, based on historic information from turkey hunting shooting-related incidents. The Task Force felt that such a shot size reduction would lessen the severity of injuries sustained from shooting incidents.
- We support the creation of a novice turkey hunting weekend, timed to coincide with the youth hunting weekend. We agree with the Department that Vermont's abundant turkey population provides a fantastic opportunity to attract new individuals to turkey hunting and we are very pleased to see additional opportunities to recruit and retain adult-onset hunters.

National Wild Turkey Federation

P.O. Box 530 • 770 Augusta Road • Edgefield, South Carolina 29824 • Phone: (803) 637-3106 • Fax: (803) 637-9180

[www.nwtf.org](http://www.nwtf.org)

hunters, knowing that they will not have to carve out limited time during the regular season, nor sacrifice their own turkey tag helping a new hunter safely pursue their first bird, as would be required under VT's mentored hunting license

- We support the proposed regulation changes relative to harvest reporting of deer and turkey. Allowing the Commissioner the latitude to authorize additional options for checking big game, including electronic and phone reporting, will have multiple benefits, including providing additional, convenient options for hunters to report their harvest, and giving biologists and wardens access to 'real-time' harvest data.

NWTF-VT greatly values the partnership we have with VFWD in building a bright future for wild turkeys and turkey hunting in Vermont. We recognize and congratulate the Department for all the hard work that went into the recent update of the Big Game Management Plan, which laid the groundwork for many of these much needed regulation changes.

Yours in Conservation,

*Morgan Gouveia*

Morgan Gouveia  
NWTF State Chapter President, Vermont

Hi,

Seeing you asked I thought I'd give you my opinion on a couple things. First I do like the youth turkey weekend. When my son was a youth hunter he was fortunate enough to lay a couple to rest and had a lot of fun hunts which produced a lifetime of memories for us both. Several years later it's still his favorite game to hunt, kudos to the VTFW.

Now the bad news. A few years ago I sat in one of the annual deer hunting meetings and listened to the VTFW tell us how few hunters were fortunate enough to harvest two bucks. With the new rule shooting one buck I strongly feel there will be so many hunters shooting multiple bucks and not tagging them more than ever. You see a nice racked 2 1/2 or older in archery season and can't shoot it because you can't hunt the remaining two deer hunting seasons. That's a real blunder on VTFW in my opinion which doesn't seem like the decision had much thought put into it. Why not consider a second buck with a minimum three or even four points on one side. I feel that would have kept the majority of hunters happy.

In closing, not shooting spike horns was the BEST decision ever. Before that law was put into place that's all I saw was spikes. Since then I have no desire to shoot one and look forward to seeing way more nice basket racked 2 1/2 yr olds and older.



One more thing, 2 1/2 months of deer hunting in this small state is a joke. I realize there is financial ramifications involved but shouldn't be at the cost of the deer herd. We all know how much stress that puts on the herd going into winter so let's be smarter about it.

Sincerely  
Troy Hull

**I am writing to provide public comment on the regulation proposal on reporting of big game. I oppose both proposals because they extend beyond the Board's authority to delegate its responsibilities. Both proposals are unnecessary and overly broad, including the lack of what constitutes an "emergency." In addition, online reporting allows unethical hunters to submit inaccurate information that may skew the biologists' data. In-person reporting should be required for all big game that are killed.**

**Thank you,**

**Janet Thouron Middlesex**

To Whom It May Concern,

I am writing to oppose the proposed regulation on big game reporting. Hunters should be required to report their kills in person. This is in the best interest of collecting solid data that can only be obtained in-person. Also, the current proposal gives the Commissioner too much power and challenges the purpose of the Fish & Wildlife Board.

Shawn Smith  
Huntington

Sent from my iPad

Dear Agency of Natural Resources,

I am writing to you because I am very concerned about the regulation that is being proposed on the reporting of big game animals. I would appreciate a response from you to tell me why you are doing this. What possibly could be a good reason for online reporting when it would be so easy to report inaccurate information? It seems only in-person reporting should be required for complete accuracy. Also, giving the commissioner unlimited power to decide what is an emergency seems very vague at best. Shouldn't there be broader oversight for Vermont's wildlife than resting in the hands of one person? I know the Fish and Wildlife Board also has unlimited power over Vermont's wildlife and that is wrong as well. They are basically accountable to no one. They don't even have to abide by their own biologists' recommendations. It is time that a diverse group of Vermont's decide the fate of Vermont's wildlife with a broad range of experiences and expertise. Maybe that is the problem? Maybe Commissioner Porter is

worried that the legislature might do just that and he wants to cement unlimited power for decisions for himself. We don't live in a dictatorship and I would advise the Agency to rethink what they are doing. I look forward to a response to me as a concerned Vermonter. Thank you.

Sincerely,

Lark Shields  
Craftsbury, VT

A couple of comments regarding the proposed changes:

- I think a phone in system is a horrible idea, ripe for abuse. I think the check in station is both useful (data collection) and an important way to keep people abiding by laws. I hunted in NY where they check in (or did then) by phone and heard stories of people taking advantage of it. I also personally love the tradition around it - I also think the public face of it is important to continue - VT's citizens should see the deer that people take home for the freezer!

-Please consider adding a ban to live action trail cameras during open big game hunting seasons

- A turkey novice season sounds great!

Thanks,

Matt  
Matthew Breton  
Charleston, VT  
[REDACTED]

I am writing to oppose the proposed regulation on big game reporting. Hunters should be required to report their kills in person. This is in the best interest of collecting solid data that can only be obtained in-person. Also, the current proposal gives the Commissioner too much power and challenges the purpose of the Fish & Wildlife Board.

Kelly Robinson

Good Morning,

I am writing today to provide public comment on the regulation proposal on reporting of big game. I oppose both proposals because they extend beyond the Board's authority to delegate its responsibilities. Both proposals are unnecessary and overly broad, including the lack of what constitutes an "emergency." In addition, online reporting allows unethical hunters to submit inaccurate information that may skew the biologists' data. In-person reporting should be required for all big game that are killed.

Thank you for your attention,

Lori Peckham  
Shelburne, VT

Hello,

Thank you for the opportunity to comment on the proposed regulation regarding 10 App. V.S.A. § 2. Report, big game.

In short, this proposal is akin to the DMV responding to COVID by eliminating driving tests and allowing people to self-declare over the internet that they can drive. Any reporting that does not include objective in-person verification invites inaccuracy and omissions that would critically undermine the trustworthiness of the reporting data.

Although it may appear on the surface to facilitate access, realistically speaking hunting is a pastime that requires mobility and anyone having sufficient mobility to complete a hunt very likely has sufficient mobility to report in person. Inspection does not inherently require close contact or indoor interaction. Hence there is insufficient justifiable gain to undermine the current system as proposed.

In re: the proposed expansion of the Commissioner's powers, this echoes the Commissioner's last defeated effort to expand his powers beyond the intent of the law. Without debating whether some degree of emergency discretion is warranted, the proposed language inexcusably offers a blanket extension of power with no limitation on what constitutes an emergency, no time limit, and no mechanism for check and balance. The Commissioner is not meant to have unilateral power, yet this language grants him that at his sole discretion. It seems to me an insult to the Board and an indication of disrespect for the representative decisionmaking process intended by the legislature.

Thank you for your consideration,

Karen Taylor  
Colchester

██████████  
██████████

Good afternoon,

I am writing to provide public comment on the regulation proposal on reporting of big game.

I oppose both proposals because they extend beyond the Board's authority to delegate its responsibilities. Both proposals are unnecessary and overly broad, including the lack of what constitutes an "emergency."

In addition, online reporting allows unethical hunters to submit inaccurate information that may skew the biologists' data. In-person reporting should be required for all big game that are killed.

Thank you. -Erin Moriarty

**I am writing to provide public comment on the regulation proposal on reporting of big game. I oppose both proposals because they extend beyond the Board's authority to delegate its responsibilities. Both proposals are unnecessary and overly broad, including the lack of what constitutes an "emergency." Also, I would not trust online reporting of big game, inviting unethical and untruthful data to be submitted by unethical hunters. If someone kills a deer or other "big game" animal, the least they should have to do is take the animal to a check station!**

Sincerely,  
Sophie Bowater Middlesex, Vermont  
VT Fish & Wildlife Seeking Public Comment

I am writing to provide public comment on the regulation proposal on reporting of big game. I oppose both proposals because they extend beyond the Board's authority to delegate its responsibilities. Both proposals are unnecessary and overly broad, including the lack of what constitutes an "emergency." If the purpose of the amendment is truly to ease the burden on hunters by authorizing electronic reporting, then there is no reason for this broad grant of authority to the Commissioner.

Barbara Lynch  
Vermont resident

I am writing to provide public comment on the regulation proposal on reporting of big game.

The proposed rule delegates broad authority normally held by the Fish & Wildlife Board under ambiguous conditions to the Commissioner, e.g. what constitutes an "emergency" under which the Commissioner can act.

The legislature has specifically given authority to the Board and not the Commissioner. The proposed rule is contrary to the intent of the regulatory regime set up by the legislature.

I also remain concerned that comments which are critical of the current Commissioner and configuration of the Board are not taken seriously, but are considered to be less important than those of the minority of Vermonters who hunt and trap. I feel I am being discriminated against and treated as a second-class citizen.

Sincerely, Barbara Felitti Huntington, VT

The two proposals are problematic. First of all, why does the Commissioner need unilateral authority to determine anything? The reason we have a Board (and a professional staff at FWD) is to make any policy or regulatory determinations in a deliberate and considered manner. There is simply no reason or need for the Commissioner to have that kind of authority.

We are already in murky waters with the introduction of electronic reporting as it is. Frankly, it opens the door to even more inaccuracy in reporting than already exists. Are we to assume that all hunters have the necessary equipment (such as scales) at home to provide the data that the FWD supposedly uses to assess the health and density of a given population? Furthermore, the spotty response rate of trappers suggests that hunters will probably be no better. It simply invites abuse. If someone is going to kill big game, the least they should have to do is take it to a check station.

Furthermore, the FWD biologists use teeth and other parts of the "harvested" animals to provide valuable information that, hopefully, aids in making policy. The new regulation pretty much wipes out the ability to collect that data. Quite frankly, the Department already comes up short regarding the use of scientific data. Sadly, this paves the way to an even more scattershot approach.

Finally, granting the Commissioner the authority to determine what is an emergency and what measures the Department should take in response goes down a dangerous road ("I, alone, can fix this.") "Emergency" is not defined in the proposed amendments and the scope of the Commissioner's response is not limited in any way, giving the Commissioner complete and unilateral authority to act. That is simply bad policy and not in keeping with the Vermont way of doing things.

In short, I am opposed to these proposals.

Thank you,  
Lisa Jablow  
Brattleboro

**I am writing to provide public comment on the regulation proposal on reporting of big game. I oppose both proposals because they extend beyond the Board's authority to delegate its responsibilities. Both proposals are unnecessary and overly broad, including the lack of what constitutes an "emergency." In addition, online reporting allows unethical hunters to submit inaccurate information that may skew the biologists' data. In-person reporting should be required for all big game that are killed.**

**Toby Powers,  
Winooski VT**

I think its important to keep up with the changes in technology as far as shot size goes, so i am all for this change to regulations.

As far as the novice hunt I firmly believe this should wait till we see how well it works for the deer novices season before we throw all our eggs in that basket.

and lastly the online reporting. Well I'm a huge supporter of this as many other states have been doing phone and or online reporting for decades. i have been screaming for us to go to this system as i've watched weigh in station after weigh in station close year after year. to the point i

myself and many others i know would have to drive 30 to 45 minutes one way to report an animal here in chittenden county. The only thing I disagree with is not reporting bears this way, as there is a real urgency to take care of bear meat right away so it doesn't spoil. I firmly believe bears should be included in the online reporting.

on another aside i would like to see the regs for moose change so that a hunter who harvest a moose is allowed to quarter and pack the animal out. such as most other states with moose season currently allow.

Sincerely  
Owen McDonald

**I am writing to provide public comment on the regulation proposal on reporting of big game. I oppose both proposals because they extend beyond the Board's authority to delegate its responsibilities. Both proposals are unnecessary and overly broad, including the lack of what constitutes an "emergency." In addition, online reporting allows unethical hunters to submit inaccurate information that may skew the biologists' data. In-person reporting should be required for all big game that are killed.**

**Rest assured that I will continue to work toward the protection of Vermont's wildlife, and encourage everyone I know to do so!**

Sincerely,  
Debora Tramposh

Hi, my name is Mackensey Smith and I am a resident of Williston, VT.

I am writing to provide public comment on the regulation proposal on reporting of big game. I oppose both proposals because they extend beyond the Board's authority to delegate its responsibilities. Both proposals are unnecessary and overly broad, including the lack of what constitutes an "emergency." In addition, online reporting allows unethical hunters to submit **inaccurate information that may skew the biologists' data**. In-person reporting should be required for all big game that are killed.

**Mackensey Smith**  
[REDACTED]

**URGENT:** I am writing to provide public comment on the regulation proposal on reporting of big game. I oppose both proposals because they extend beyond the Board's authority to delegate its responsibilities. Both proposals are unnecessary and overly broad, including the lack of what constitutes an "emergency." In addition, online reporting allows unethical hunters to submit inaccurate information that may skew the biologists' data. In-person reporting should be required for all big game that are killed.

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Erin Scott

**I am writing to provide public comment on the regulation proposal on reporting of big game. I oppose both proposals because they extend beyond the Board's authority to delegate its responsibilities. Both proposals are unnecessary and overly broad, including the lack of what constitutes an "emergency." In addition, online reporting allows unethical hunters to submit inaccurate information that may skew the biologists' data. In-person reporting should be required for all big game that are killed.**

**Thank you for your consideration in this matter.**

**Janice Stearns**

**Middlebury**

**I am writing to provide public comment on the regulation proposal on reporting of big game. I oppose both proposals because they extend beyond the Board's authority to delegate its responsibilities. Both proposals are unnecessary and overly broad, including the lack of what constitutes an "emergency." In addition, online reporting allows unethical hunters to submit inaccurate information that may skew the biologists' data. In-person reporting should be required for all big game that are killed.**

**Sincerely,  
Nicole Rouille**

**I am growing more concerned with the increase in baiting wildlife, all I see is logging, clearing the land and deer plots and corn being feed to the animal. This is NOT hunting its feeding and killing an animal, while sitting on a four wheeler with a beer! I am also posting my property, and am very disappointed in this current proposal, why would you even consider such an act, are you trying to hide something?**

**I am writing to provide public comment on the regulation proposal on reporting of big game. I oppose both proposals because they extend beyond the Board's authority to delegate its responsibilities. Both proposals are unnecessary and overly broad, including the lack of what constitutes an "emergency." In addition, online reporting allows unethical hunters to submit inaccurate information that may skew the biologists' data. In-person reporting should be required for all big game that are killed.**

**Thank you, Roxanne Russell**

**I am writing to provide public comment on the regulation proposal on reporting of big game. I oppose both proposals because they extend beyond**

the Board's authority to delegate its responsibilities. Both proposals are unnecessary and overly broad, including the lack of what constitutes an "emergency." **In addition, online reporting** allows unethical hunters to submit **inaccurate information that may skew the biologists' data**. In-person reporting should be required for all big game that are killed.

Best,  
Sumi Sin  
Bristol, VT

**I am writing to provide public comment on the regulation proposal on reporting of big game. I oppose both proposals because they extend beyond the Board's authority to delegate its responsibilities. Both proposals are unnecessary and overly broad, including the lack of what constitutes an "emergency." In addition, online reporting allows unethical hunters to submit inaccurate information that may skew the biologists' data. In-person reporting should be required for all big game that are killed.**

PAMELA TOWNE

**I am writing to provide public comment on the regulation proposal on reporting of big game. I oppose both proposals because they extend beyond the Board's authority to delegate its responsibilities. Both proposals are unnecessary and overly broad, including the lack of what constitutes an "emergency." In addition, online reporting allows unethical hunters to submit inaccurate information that may skew the biologists' data. In-person reporting should be required for all big game that are killed.**

Thank you,  
Alice Silverman, MD  
[REDACTED]  
Montpelier VT 05602

**I am writing to provide public comment on the regulation proposal on reporting of big game. I oppose both proposals because they extend beyond the Board's authority to delegate its responsibilities. Both proposals are unnecessary and overly broad, including the lack of what constitutes an "emergency." In addition, online reporting allows unethical hunters to submit inaccurate information that may skew the biologists' data. In-person reporting should be required for all big game that are killed.**

--  
Dean Percival  
[REDACTED]  
New Haven, VT 05472  
[REDACTED]



To whom it may concern,

I am writing to provide public comment on the regulation proposal on reporting of big game. I oppose both proposals because they extend beyond the Board's authority to delegate its responsibilities. Both proposals are unnecessary and overly broad, including the lack of what constitutes an "emergency." In addition, online reporting allows unethical hunters to submit inaccurate information that may skew the biologists' data. In-person reporting should be required for all big game that are killed.

Thank you for your time.

Best Regards, Ron Ruth Morrisville VT 05661

To the Vermont ANR;

**I am writing to provide public comment on the regulation proposal on reporting of big game. I oppose both proposals because they extend beyond the Board's authority to delegate its responsibilities. Both proposals are unnecessary and overly broad, including the lack of what constitutes an "emergency." In addition, online reporting allows unethical hunters to submit inaccurate information that may skew the biologists' data. In-person reporting should be required for all big game that are killed.**

Thank you,

Barbara Johnson  
Shelburne, Vermont

**I am writing to provide public comment on the regulation proposal on reporting of big game. I oppose both proposals because they extend beyond the Board's authority to delegate its responsibilities. Both proposals are unnecessary and overly broad, including the lack of what constitutes an "emergency." In addition, online reporting allows unethical hunters to submit inaccurate information that may skew the biologists' data. In-person reporting should be required for all big game that are killed.**

**We the public are concerned about this matter.  
Thank you for your consideration of our votes.**

Jim Ludwig

Off the turkey topic slightly, but how about extending the lifetime cost saving membership cost at 12 months of age to 24 months of age?

We missed this by days with our second child (partially due to mail times and tried to review but there are no exceptions). This prohibited us from pursuing this for our now 2.5 year old.

Maybe allow a one month offer for a reduced lifetime membership??

I have know several individuals who also are so crazy with life even at their first child that they missed the cut off. Literally 2 days ago I heard this from a colleague, but also hear it from several patients. I try to encourage new parents when I see them in primary care to pursue this, but understand that first year is a blur. Just trying to figure out these little beautiful creatures and not necessarily about their hunting and fishing future especially when I have never done so myself, but would like that to be an opportunity for them if interested!

Kristy Garbarino, Family nurse practitioner

I am writing to provide

- > public comment on the regulation proposal on reporting of big game. I
- > oppose both proposals because they extend beyond the Board's authority to
- > delegate its responsibilities. Both proposals are unnecessary and \*\*overly
- > broad, including the lack of what constitutes an "emergency."\*\*Also, I
- > would not trust online reporting of big game, inviting unethical and
- > untruthful data to be submitted by unethical hunters. If someone kills a
- > deer or other "big game" animal, the least they should have to do is take
- > the animal to a check station!

Sincerely yours,

Camilla Bowater  
Williston, VT

I am writing to oppose the proposed regulation on big game reporting. Hunters should be required to report their kills in person. This is in the best interest of collecting solid data that can only be obtained in-person. Also, the current proposal gives the Commissioner too much power and challenges the purpose of the Fish & Wildlife Board.

Thank you,

Kimberly DINofrio  
Morristown, VT

I am writing to provide public comment on the regulation proposal on reporting of big game. I oppose both proposals because they extend beyond the Board's authority to delegate its responsibilities. Both proposals are unnecessary and overly broad, including the lack of what constitutes an "emergency." In addition, online reporting allows unethical hunters to submit inaccurate information that may skew the biologists' data. In-person reporting should be required for all big game that are killed.

Trudy Jones

# FISHERIES REGULATION SIMPLIFICATION

## Background:

Ongoing – 2005, etc.

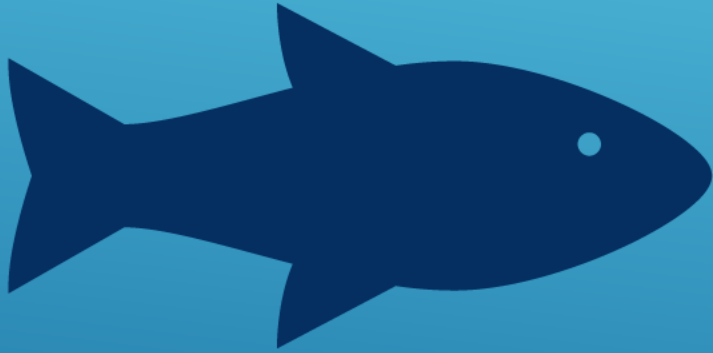
Recent one started in 2019

## Team:

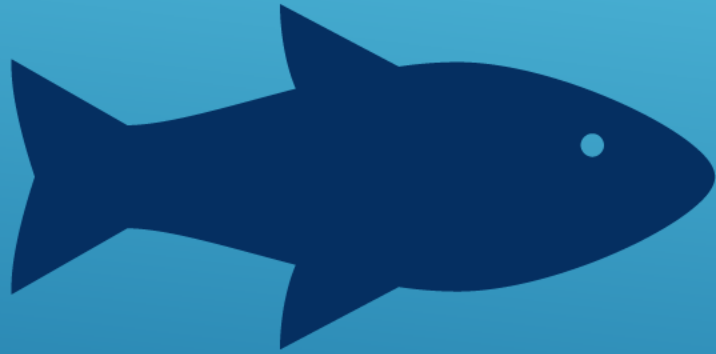
- Fisheries
- Law Enforcement
- Commissioner

## Goal:

- Make Vermont Fishing Regulations simpler and easier for average anglers to understand
- Maintain needed biological protections



# FISHERIES REGULATION SIMPLIFICATION



## Multiple approaches

### Regulation

- Deletion
- Consolidation
- Clarification

### Law digest

- Format
- Table consolidation
- Clarifying language



# FISHERIES REGULATION SIMPLIFICATION

## Review Process

Reviewed fisheries regulations in

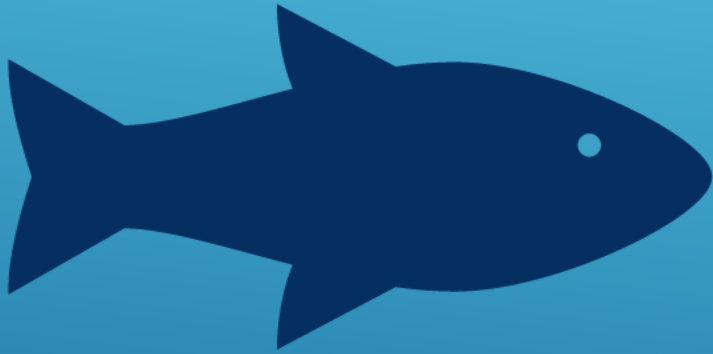
- **10 App. V.S.A. § 122**

Identified potential changes

- Review by Fisheries Teams and Districts for biological consideration

Created concept proposal

Apply concept proposal to law digest



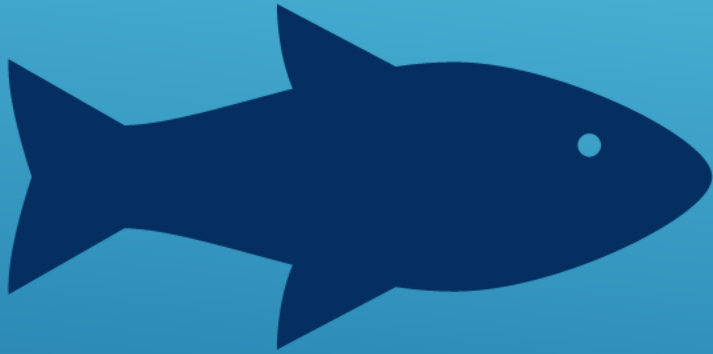
# FISHERIES REGULATION SIMPLIFICATION

## Next Steps:

**September 3, 2020** - Introduce concept proposal to F&W Board

**October 2020** – Work with F&W Board to have public informational meetings

**November – December 2020** – Review comments and develop final proposal



# FISHERIES REGULATION SIMPLIFICATION

## Next Steps:

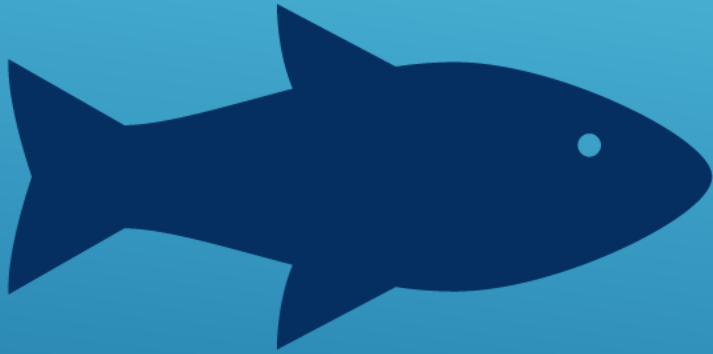
**January 2021** - Presentation and proposal to F&W Board

- Start rulemaking process

**January – June 2021** - Rulemaking process

- Hearings, additional votes, etc.

**January 2022** - Regulations take affect

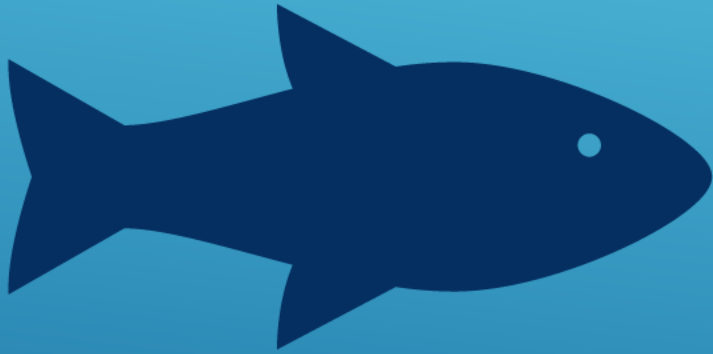


# FISHERIES REGULATION SIMPLIFICATION

## Important Terms:

### Seasonally closed - Lakes/Ponds

- Can only fish during open trout season
- Some allow Ice fishing
- Select Lakes/Ponds



### Seasonally closed - Streams/Rivers

- Can only fish during open trout season
- All Streams/Rivers
- Few exceptions



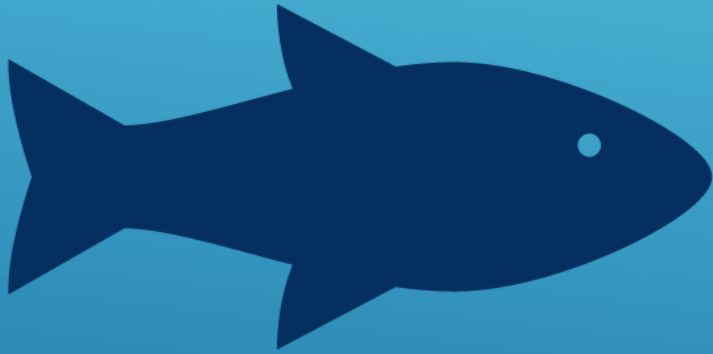


# FISHERIES REGULATION SIMPLIFICATION

## Concept Proposal – Return to general regs:

### Seasonally closed - Lakes/Ponds

- 36 waters taken off list
- 2 added (biological reasons)
- Leaving 41 waters on the list



### Seasonally closed - Streams/Rivers

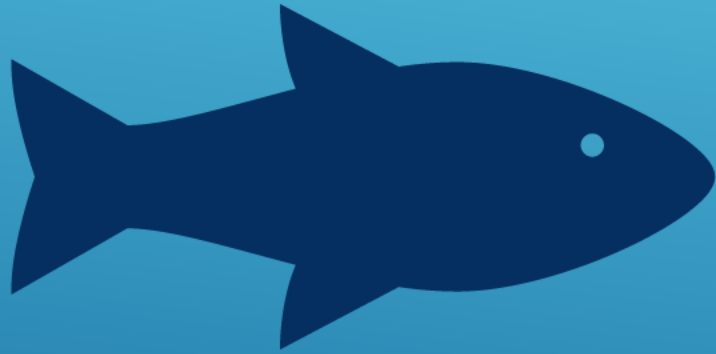
- Eliminate seasonally closed streams/rivers
  - Can fish year round
  - C&R with artificial lures and flies outside regular season for species like trout.



# FISHERIES REGULATION SIMPLIFICATION

Concept Proposal – Change to general regs:

Expand catch and release – All Waters



- For species with defined harvest seasons, TARGETED C&R angling can occur outside of harvest season, using artificial lures and flies.

Expand ice fishing trout season – Lakes/Ponds

- More waters
- Start date shift
  - Current: 3<sup>rd</sup> Sat in January
  - Proposed: January 1<sup>st</sup>

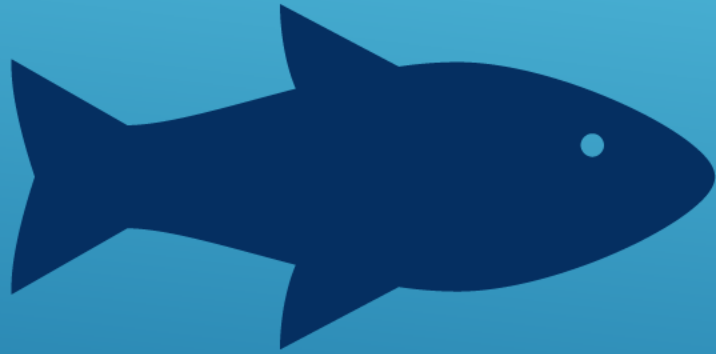


# FISHERIES REGULATION SIMPLIFICATION

Concept Proposal – Change to general regs:

Expand bass harvest season – All Waters

- Current: 2<sup>nd</sup> Sat in June to Nov 30
- Proposed: 2<sup>nd</sup> Sat in June to March 15
- Exception – Lake Champlain and 16 other lakes/ponds



Landlocked Atlantic salmon minimum length – All Waters

- Current: minimum length 15" and special regulation 17"
- Proposed: minimum length 17"
- Exception – Lake Champlain

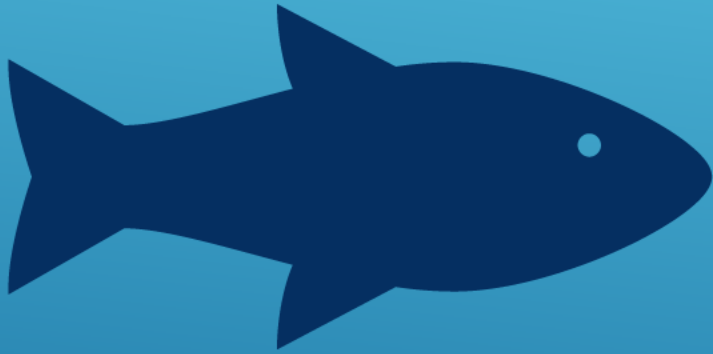


# FISHERIES REGULATION SIMPLIFICATION

Concept Proposal – Changes to general regs:

Trout daily limit – Streams/Rivers

- Decrease brook trout from 12 to 8
- Increase brown and rainbow from 6 to 8
- Combined daily trout Limit = 8



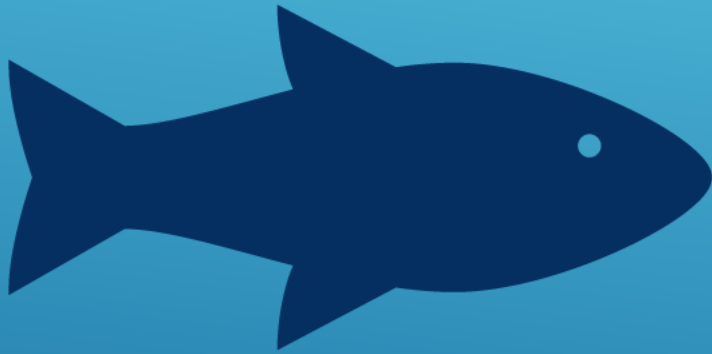
Streams/Rivers Combined Daily Trout Limit = 8



# FISHERIES REGULATION SIMPLIFICATION

Important Terms:

## Special Regulations



- Different than general regulations and apply to a limited number of waters.
- Specific waters are listed in regulations.
- Established to address specific concerns which may be socially or biologically driven.
- Examples:
  - Closure of spawning area
  - Trophy trout 2 fish limit



# FISHERIES REGULATION SIMPLIFICATION

## Concept Proposal – Special Regulations

Daily bag limit 2 – rainbow and brown trout

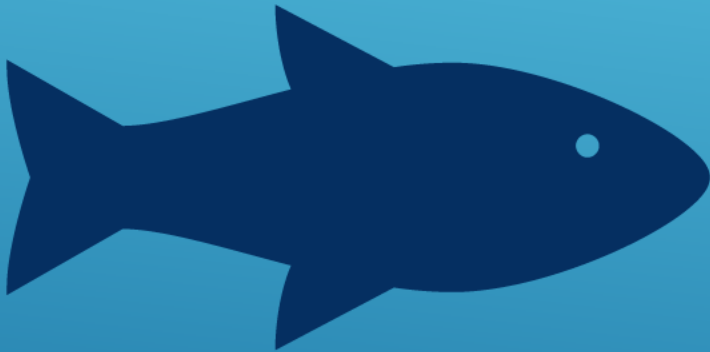
- 1 stream added (shifted from other regulation)
- 4 lakes taken off list
- 5 stream/river sections remain on list

Daily bag limit 2 – brook, brown, rainbow, lake trout and salmon

- 2 lakes taken off list
- 21 lakes/ponds remain on list

Spring river closures – 2<sup>nd</sup> Sat in April to May 31

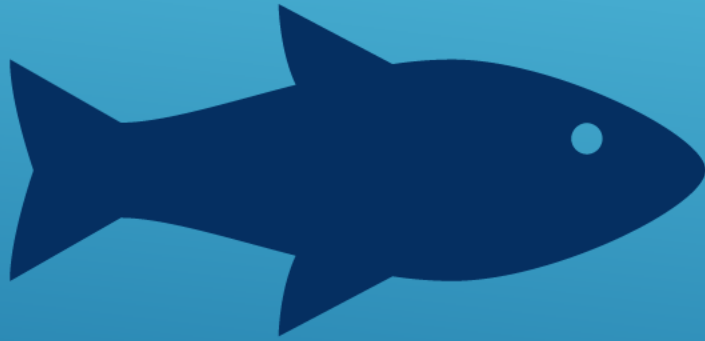
- 6 river sections taken off list
- 16 stream/river sections remain on list



# FISHERIES REGULATION SIMPLIFICATION

## Concept Proposal – Special Regulations

Lakes/Ponds - Special regulations to general regulations



### Little Averill and Seymour Lakes – Lake Trout

Current	Proposed – general regulations
4 lines ice, 1 line open-water Lake trout limit = 1 Lake trout min. length = 20"	8 lines ice, 2 lines open-water Lake trout limit = 2 Min length = 18"

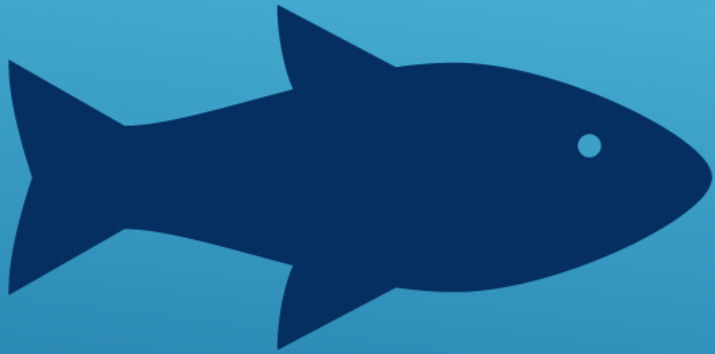
### Kent and Baker Ponds – Bass

Current	Proposed – general regulations
bass daily limit = 10 bass between 10-12" must be released and only 1 bass over 12"	bass daily limit = 5 Min length = 10"



# FISHERIES REGULATION SIMPLIFICATION

What does this mean for anglers?

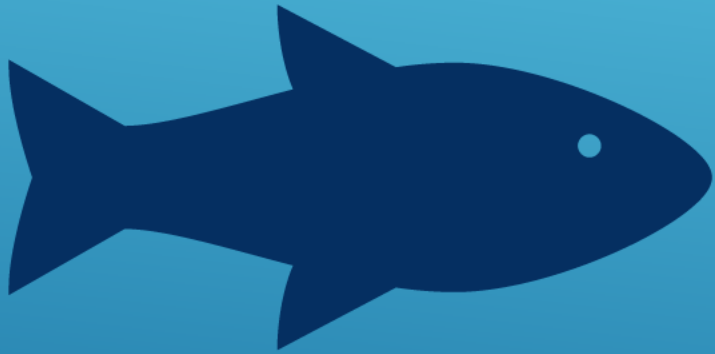


9/3/2020



# FISHERIES REGULATION SIMPLIFICATION

What does this mean for anglers?



Fewer special regulations

Outside of a short list of seasonally closed waters or special regulation waters an angler can fish most Vermont waters any time of the year with artificial lures or flies if they practice catch and release.



# FISHERIES REGULATION SIMPLIFICATION

What does this mean for the law digest?





# FISHERIES REGULATION SIMPLIFICATION

## What does this mean for the law digest?

Draft Proposal of Regulation Simplification – Tables – CT and Champlain would stay the same.

**TABLE 1:** General Fishing Regulations for Vermont. Note different regulation for River/Stream and Lake/Pond

PLEASE NOTE: Waterbody-specific regulations listed in Index of Rivers/Index of Lakes override the general regulation.

Species	Type of Water Body	Length	Daily Limit	Legal Methods	Open Seasons
<b>BOWFIN, MULLET (REDHORSE), GAR</b>	<b>River/Stream</b>	None	No more than 5 of any one species	Open-water fishing	All Year
	<b>Lake/Pond</b>	None	No more than 5 of any one species	Open-water fishing, ice fishing, spear gun, bow and crossbow all with line attached	
<b>BROOK TROUT and BROWN TROUT and RAINBOW TROUT</b>	<b>River/Stream</b>	None	Total of brook + brown + rainbow = no more than <b>8</b>	Open-water fishing	2nd Sat. in April to Oct. 31
	<b>Lake/Pond</b>	None	Total of brook + brown + rainbow = no more than <b>6</b>	Open-water fishing, ice fishing	2nd Sat. in April to Oct. 31 And Jan 1 to March 15

<b>MUSKELLUNGE</b>	AM	NA	0	Catch and release open-water fishing with artificial lures and flies only	All Year
<b>NORTHERN PIKE</b>	AM	20"	5	Open-water fishing, ice fishing	All Year
<b>RAINBOW SMELT</b>	AM	None	None	Open-water fishing, ice fishing	All Year
<b>SALMON</b>	AM	NA	0	None	No open season
<b>WALLEYE</b>	AM	18"	3	Open-water fishing, ice fishing	1st Sat. in May to March 15
<b>YELLOW PERCH</b>	AM	None	50	Open-water fishing, ice fishing	All Year
<b>ALL OTHER SPECIES</b>	AM	None	None	Open-water fishing, ice fishing	All Year

Catch and Release: For species with defined harvest seasons, targeted C&R angling can occur outside of harvest season, using artificial lures and flies.

NOTE: DAILY LIMITS are not additive between River/Stream and Lake/Pond for a species.



# FISHERIES REGULATION SIMPLIFICATION

## What does this mean for the law digest?

Draft Proposal of Regulation Simplification – Tables – CT and Champlain would stay the same.

TABLE 1: General Fishing Regulations for Vermont. Note different regulation for River/Stream and Lake/Pond

PLEASE NOTE: Waterbody-specific regulations listed in Index of Rivers/Index of Lakes override the general regulation.

Species	Type of Water Body	Length Rules	Daily Limit	Legal Methods	Open Seasons
LAKE TROUT	River/Stream	18"	Total of lake trout + landlocked salmon = no more than 2	Open-water fishing	2nd Sat. in April to Oct. 31
LANDLOCKED ATLANTIC SALMON		17"			
LAKE TROUT	Lake/Pond	18"	Total of lake trout + landlocked salmon = no more than 2	Open-water fishing, ice fishing	2nd Sat. in April to Oct. 31 And Jan 1 to March 15
LANDLOCKED ATLANTIC SALMON		17"			
LARGEMOUTH and SMALLMOUTH BASS	All	10"	Total of largemouth + smallmouth = no more than 5	Open-water fishing, ice fishing	2nd Sat. in June to March 15
MUSKELLUNGE	All	NA	0	Catch and release open-water fishing with artificial lures and flies only	All Year



SALIDER	All	NA	0	None	No open season
WALLEYE	All	18"	3	Open-water fishing, ice fishing	1st Sat. in May to March 15
YELLOW PERCH	All	None	50	Open-water fishing, ice fishing	All Year
ALL OTHER SPECIES	All	None	None	Open-water fishing, ice fishing	All Year

Catch and Release: For species with defined harvest seasons, targeted C&R angling can occur outside of harvest season, using artificial lures and flies.

NOTE: DAILY LIMITS are not additive between River/Stream and Lake/Pond for a species.

# FISHERIES REGULATION SIMPLIFICATION

## What does this mean for the law digest?

Tables:

Digest will only need 3 tables under proposal:

- General Vermont Waters
- Lake Champlain
- Connecticut River



# FISHERIES REGULATION SIMPLIFICATION

What does this mean for the law digest?

## Index of Rivers and Streams

- 26 stream sections moved to general regulations



# FISHERIES REGULATION SIMPLIFICATION

What does this mean for the law digest?

## Index of Lakes and Ponds

- 44 lakes/ponds moved to general regulations
- 25 lakes/ponds will have a portion of their special regulations lifted
- 13 lakes/ponds added special regulations for biological protection





# FISHERIES REGULATION SIMPLIFICATION

## Review of Timeline

- Informational presentation to F&W Board – Sept 2020
- Public informational meetings – Fall 2020
- Bring official proposal to F&W Board – Jan 2021
- Rulemaking process complete – June 2021
- Significant law digest modifications – June - July 2021
- Changes take effect - Jan 2022



# FISHERIES REGULATION SIMPLIFICATION

Key closing points:

Increase angling opportunities while maintaining needed biological protections

Law digest simplification with most Vermont waters referencing a single table

Outside of a short list of seasonally closed waters or special regulation waters, an angler could fish most Vermont waters any time of the year with artificial lures or flies if they practice catch and release.

Questions or Comments?



# FISHERIES REGULATION SIMPLIFICATION

## Public Informational Meetings – Fall 2020

- ▶ Virtual meetings (2-3)
- ▶ Utilize social media
- ▶ F&W Board involvement

