



March 20, 2018

Re: Fish & Wildlife's Proposal for a 2018 Moose Hunt

Dear Commissioner Louis Porter & Members of the Fish & Wildlife Board:  
It is no surprise to anyone that the moose herd is in dire shape. It's also clear that the Vermont Fish & Wildlife Department (Department) has historically issued excessive permits despite the fact that threats to moose populations have increased, and we're now suffering the consequences of that. In the span on five years, ranging from 2005-2009, the Department issued close to 6000 permits. We consider this an abdication of the Department's statutory responsibility to manage and conserve this iconic species for **all** Vermont residents, including future generations of Vermonters.

To quote the Department, "The moose herd in the Northeast Kingdom was finally reduced to target densities 7 years ago, after many years of overpopulation. But, despite population reduction, reproductive rates remained well below healthy levels and continue to do so." The moose herd is declining, yet the Department continued to issue permits to hunters each year. You've "managed" the herd to such a low level for years, killing healthy cows, that the herd is unable to bounce back.

Of all the factors that are impacting the population of Vermont's moose, the only one that is controllable is the number of healthy moose that are allowed to be killed by hunters. Brainworm, winter ticks, and cars on the road (the Chittenden county F&W Board member, who's also a bow hunter, mockingly suggested we should just stop driving), are not factors that can be

Protect Our Wildlife  
PO BOX 3024  
Stowe, VT 05672  
[www.ProtectOurWildlifeVT.org](http://www.ProtectOurWildlifeVT.org)

managed immediately or in the near future. We CAN manage how many moose are unnecessarily killed by hunters.

The only acceptable answer is no moose permits for 2018 - not even one. The moose in wildlife management units E1 and E2 are within the Department's own, ever-changing, "target density" now. So, why the hunt? It is clear to us that the Department is still allowing the hunt to solely placate those hunters (including moose hunting guides), and Fish & Wildlife Board members, who have voiced concerns that if the 2018 moose hunt is suspended, that it'll be difficult to reinstate a season in the future. That is paranoid, irrational thinking that is ultimately driving wildlife "management" decisions. Hunting moose, even in these limited WMUs, is obviously not in the best interest of moose; this moose hunt is not "managing" the health of the herd, it is managing hunters' expectations and desires.

The Department has not provided evidence that would justify any permits this year, yet wildlife advocates sought a compromise and were rebuffed. We asked that if the moose hunt is allowed in 2018, why not require that any non-lethal injuries of moose that aren't recovered, be required to count towards the hunter's bag limit for that season? Other states do this for big game, but Vermont won't even offer this meager level of protection for this at-risk species.

Vermont's moose study was just started in January 2017 – not nearly long enough to allow for the collection and analysis of data to come to any conclusions. Do the responsible thing and suspend the moose hunt. Continuing to issue permits, not knowing what the outcome of the study might be, is a gamble and you've already done enough of that, and lost.

Sincerely,



Brenna Galdenzi  
POW President & Co-Founder