

PHILIP B. SCOTT
Governor



State of Vermont
OFFICE OF THE GOVERNOR

September 1, 2017

Secretary Ryan Zinke
United States Department of the Interior
1849 C Street, N.W.
Washington, D.C. 20240

RE: Silvio O. Conte National Fish and Wildlife Refuge

Dear Secretary Zinke:

I'm writing to express concerns about the U.S. Fish and Wildlife Service's (USFWS) proposal to acquire additional acreage for the Silvio O. Conte National Fish and Wildlife Refuge.

Vermont is known for its rural communities, our lush forests and fertile farmland. Unlike many western states, where large percentages of land are owned or controlled by the federal government, our land use history and heritage centers on private ownership. These lands provide our citizens with recreational opportunities, an exceptional quality of life, and jobs.

Our passion for our working landscape is key to why we have held, and will continue to hold a strong heritage of land conservation and protection. Vermont is a conservation-friendly state. In fact, more than half of our total land is conserved or otherwise undevelopable, according to the Vermont Center for Geographic Information. In Vermont, much of the protection of these special places has been accomplished through the work of our private land trusts, nonprofit organizations, local government, and state government.

Another successful model has been the U.S. Forest Service's Forest Legacy Program, through which federal conservation funding comes to the state. In this model, the land stays in private ownership and a conservation easement is held by the state. This program has protected more than 86,000 acres in Vermont. The conservation projects are almost always sponsored and endorsed by local land conservation organizations and town governments. In several instances, the funding has gone to towns to create town forests.

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Considering the aforementioned facts, I'm concerned with the U.S. Fish and Wildlife Service's (USFWS) proposal to significantly expand the Silvio O. Conte Refuge. In the Comprehensive Conservation Plan (CCP) adopted in January of this year, the USFWS proposes to acquire an additional 60,232 acres of Vermont farm and forestland – land essential to preserving two economic sectors that distinguish Vermont from most other states and that contribute significantly to the state and local tax base – within the Connecticut River watershed. If successful, in several of the communities within the CCP's scope, up to 40 percent of an individual town's total acreage would be owned by the federal government.

My concerns over the USFWS' proposed land acquisition goals also stem from the Department's land acquisition track record. In the 1995 Silvio O. Conte National Fish and Wildlife Refuge Action Plan, the agreed upon land acquisition plan for Vermont significantly changed over the years, altering the cooperative landowner agreements and increased federal fee ownership. The result has been that large amounts of farm and forest land are significantly less productive than they had previously been. This put more strain on our farm and forest economies as they compete in an increasingly competitive global market and contracted the tax base at a time when Vermont is confronting challenging demographic trends.

In addition to my reservations, I'm hearing deep concerns from many of these towns, landowners, individuals who make their living working the land (e.g. logging, farming, etc.), and elected officials about the proposed acreage being sought for the Conte Refuge.

Additionally, I have the following questions:

- Will Silvio O. Conte lands be subject to NEPA, and other similar environmental planning regulations? If so, will working lands remain working and fully productive?
- Is it the expectation that Silvio O. Conte lands will be more productive than State Fish and Wildlife lands? If so, what metrics will be used to make this determination and how much more productivity could we expect to see on an annual basis?
- After broken assurances in plans over the years, what guarantees can USFWS make to Vermont so history does not repeat itself and how will the state be able to hold the federal government accountable for its commitments?
- Has USFWS notified or interacted with all the landowners whose property is to be acquired? If so, is there a public record of landowner reaction?
- The USFWS has recently completed the Comprehensive Conservation Plan, (CCP) after owning major parcels for over 20 years. There is still no recreation plan or habitat plan.

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- When will these plans be completed?
 - Will there be a better and more inclusive public involvement process for these plans?
 - Will the USFWS commit to not purchasing any new parcels until these plans are completed?
 - How can Vermont support additional land acquisition without knowing what it will be used for and what specific impacts it will have on our farm and forest economies and on local tax base?
- What is the official position of the USFWS on the nighttime use of Refuge lands?
 - If the land were acquired, would the USFWS allow conditional uses?
 - Will the USFWS commit to asking Congress for full and guaranteed funding of tax payments to towns?

As Governor, my top priorities are growing the economy, making Vermont more affordable and protecting the most vulnerable. In fact, I look at everything through that lens. And because of the lack of information and the unknown impacts this will have on our economy, I am very apprehensive about the federal government acquiring additional land for the Silvio O. Conte Wildlife Refuge.

I hope the USFWS can provide some answers to my questions. Thank you for your attention to this matter.

Sincerely,



Philip B. Scott
Governor

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CC: Steven Smith, Department of the Interior