



QUALITY DEER MANAGEMENT ASSOCIATION

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Date: 16 September 2013
To: House Game and Fisheries Committee
From: Kip Adams, Director of Education and Outreach
Re: HB 1576

On behalf of the Quality Deer Management Association (QDMA) I am writing to oppose HB 1576, the Endangered Species Coordination Act. The QDMA is an international nonprofit wildlife conservation organization dedicated to ensuring the future of white-tailed deer, wildlife habitat, and our hunting heritage. The QDMA has nearly 50,000 members nationwide including over 3,000 in Pennsylvania. Notably, Pennsylvania's membership includes hunters, landowners, and numerous wildlife and forestry professionals.

House Bill 1576 would eliminate the independence of the Pennsylvania Game Commission (PGC), by subjecting their actions to the Independent Regulatory Review Commission (IRRC) review process—a process that adds extra layers of bureaucracy, creates administrative inefficiencies, and will require that all listings of threatened or endangered species be done through a formal rule-making process.

House Bill 1576 would also remove all currently listed threatened and endangered species from the state list, unless they can be re-listed under the Act's arduous listing processes within two years or unless they are a federally-listed species. Not only would this bill undo untold amounts of work by the PGC over the past several decades, it would place additional time and expense burdens on the Commonwealth by requiring the Commissions to re-nominate and re-list species.

House Bill 1576 is unnecessary as the PGC currently has a rigorous and transparent process for designating threatened and endangered species that considers public input. Data are obtained via well established, scientific sampling methods. Also, the PGC utilizes independent and peer-reviewed data in considering the listing of species, provided through uniform criteria established by the PA Biological Survey. The IRRC does not have the requisite scientific expertise or standards to evaluate species listing proposals.

The PGC is currently required to comply with the Commonwealth Documents Law, providing public notice of any potential listing in the Pennsylvania Bulletin along with an opportunity for public review and comment, and for submission of additional data. Further, the public has an opportunity to comment on decisions before the Commission at every Commission meeting. Finally, the PGC is not abusing their discretion to list species as it has only listed three species in the last decade.

Scientific wildlife management is important for Pennsylvania's wildlife, their habitats, hunters and the state's economy. For these reasons the QDMA urges you to oppose House Bill 1576. Thank you for your time and your commitment to Pennsylvania's natural resources.

Respectfully,

Kip Adams

Kip Adams
Director of Education & Outreach