



July 6, 2020

Chris Blankenship
Commissioner
Alabama Department of Conservation and Natural Resources
64 North Union Street
Montgomery, AL 36130

RE: Proposed Rule Amendments:

- 220-2-.02 Legal Arms, Ammunition, and Equipment for Hunting
- 220-2-.25 Prohibition on the Possession of Imported Cervidae Body Parts
- 220-3-.83 Recreational Reporting of Certain Gulf Reef Fish

Commissioner Blankenship,

On behalf of the Congressional Sportsmen's Foundation (CSF), thank you for the opportunity to comment on the Alabama Department of Conservation and Natural Resources' (DCNR) proposed rule amendments. Specifically, we support the proposal to prohibit the possession of imported Cervidae body parts and the proposal to require anglers to report greater amberjack and gray triggerfish harvests. While we generally support expanding the allowances for airguns and arrow shooting airguns to be used for hunting, our support for this provision is conditional and dependent on the implementation of a Conservation Airgun Stamp or similar mechanism to ensure the use of these items afield contributes to the American System of Conservation Funding in the same manner as other methods of take.

Since 1989, CSF has maintained a singleness of purpose that has guided the organization to become one of the most respected and trusted sportsmen's organization in the political arena. CSF's mission is to work with Congress, governors, and state legislatures to protect and advance hunting, angling, recreational shooting and trapping. The unique and collective force of the Congressional Sportsmen's Caucus, the Governors Sportsmen's Caucus, and the National Assembly of Sportsmen's Caucuses, working closely with CSF, and with the support of major hunting, angling, recreational shooting, and trapping organizations, serves as an unprecedented network of pro-sportsmen elected officials that advance the interests of America's hunters and anglers.

Legal Arms, Ammunition, and Equipment for Hunting (Rule 220-2-.02)

CSF generally supports increasing opportunities for hunters by expanding legal methods of take. Our support for the proposed expansions for the use of airguns and arrow shooting airguns, however, is contingent on a state-level conservation mechanism that provides parity among all approved methods of take. Airguns and arrow shooting airguns are not included in the Pittman-Robertson Act (PR), and the rule proposal therefore undermines the "user-pays, public-benefits" American System of Conservation

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Funding because airguns and arrow shooting airguns do not contribute to conservation funding in the same manners as firearms and archery equipment. As you know, the DCNR's revenue is supported 100% by license sales, grants and the Wildlife and Sport Fish Restoration federal match. During this uncertain economic time for state fish and wildlife agencies, we encourage the DCNR be a leader in providing equity among hunters and recommend that the agency institute a state-level conservation stamp for airguns and arrow shooting airguns. Doing so will have the additional benefit of providing the DCNR with additional funds to be used as the state-side match to secure Pittman-Robertson funds in a time when firearms sales are at record levels. Until airguns and arrow shooting rifles are included in PR, we encourage states to look for creative ways to ensure that hunters using airguns and arrow shooting rifles contribute equitably to conservation funding.

We would welcome the opportunity to explore state-level conservation funding mechanisms for airguns and arrow shooting airguns with you. For additional information, please see the attached issue brief on Airguns and Arrow Shooting Airguns.

Prohibition on the Possession of Imported Cervidae Body Parts (Rule 220-2-.25)

CSF supports the proposed rule to prohibit the possession of imported Cervidae body parts. In addition to the current ban on the importation of Cervidae body parts, prohibiting the possession of imported Cervidae body parts would strengthen efforts to prevent Chronic Wasting Disease (CWD) introduction into Alabama. CWD is a slow and progressive neurological disease that proves to be always-fatal, and the proposed rule would add enhanced enforcement tools to prevent CWD introduction into the state (and if introduced, the rule would help limit further transmission within the state). As deer hunting is the primary driver for license sales and the hunting economy as a whole, we are supportive of this measure to protect Alabama's deer hunting heritage and the critical conservation funding system that supports the DCNR.

Recreational Reporting of Certain Gulf Reef Fish (Rule 220-3-.83)

CSF fully supports the addition of the greater amberjack and gray triggerfish to the species subject to the recreational reporting requirements. In general, the states are better suited to manage the fishery harvest data than the current federal program, the Marine Recreational Information Program (MRIP), as evidenced by the red snapper fishery. After two highly successful years of allowing individual states in the Gulf of Mexico to manage their portion of the private recreational red snapper quota, National Oceanic and Atmospheric Administration Fisheries announced the Final Rule to Implement State Management of Private Angling for Red Snapper. State management of the red snapper fishery has helped limit the uncertainty associated with MRIP by providing a more efficient and timelier data collection system conducted by each individual state.



Therefore, we support the proposal to add greater amberjack and gray triggerfish to the list of Gulf reef fish subject to recreational reporting requirements. We hold confidence in the methods the DCNR uses in their data collection systems and would also support adding additional species in the future.

Thank you again for the opportunity to provide comments. If you have questions or would like additional information, please feel free to contact me.

Sincerely,

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Enclosed: Issue Brief on Airguns and Arrow Shooting Airguns