October 12, 2018

RE: Sunday Hunting on Game Lands

Dear Director Myers,

On behalf of the undersigned organizations that collectively represent the interests of hundreds of thousands of North Carolina hunters, we respectfully encourage the North Carolina Wildlife Resources Commission (WRC) to move forward with rulemaking to implement the public lands Sunday hunting provision of the “Outdoor Heritage Enhanced” legislation of 2017.

We would first like to extend our sincere gratitude to the WRC for their longstanding commitment to increasing access for hunters by supporting policies in favor of expanding Sunday hunting opportunities. We recognize that the WRC has a robust history of supporting such policies, including: (1) the regulations that the WRC adopted in 2009 authorizing Sunday hunting with archery equipment on private lands; (2) the resolution the WRC adopted in 2013 supporting legislation that would have removed the prohibition against Sunday hunting with firearms on privately owned land; (3) the resolution the WRC adopted in 2015 expressing support for the Outdoor Heritage Act that allowed Sunday hunting with firearms on private property for the first time since 1869; and (4) the resolution the WRC adopted in 2017 expressing support for legislation to increase public hunting opportunities. Without the support of the state agency, the Sunday hunting expansions of recent years would not have been possible, and we are truly appreciative of the WRC’s commitment to carrying out its mission of providing opportunities for hunters to enjoy wildlife-associated recreation by backing policies that increase opportunities to hunt seven days a week.

However, since the passage of the “Outdoor Heritage Enhanced” legislation in 2017 that authorized the WRC to promulgate rules to allow Sunday hunting on public lands of the state managed for hunting, the WRC has proposed no rules that would open Sunday hunting on any of
the more than 2 million acres of Game Lands in the state. While it would have been difficult to enact rules in time for the 2017-18 hunting seasons, the lack of action to propose rules to open Sunday hunting on Game Lands for the 2018-19 hunting seasons was a missed opportunity for North Carolina’s hunters that rely on access to public lands for hunting. While North Carolinians with access to private land have been hunting on Sundays with archery equipment since 2010 (the WRC could have also authorized Sunday hunting with archery equipment on Game Lands at that time) and with firearms since 2015, sportsmen and women without access to private property have yet to be afforded seven-day hunting opportunities.

Access and R3
Access is critical to recruiting, retaining, and reactivating hunters (R3), but not all North Carolina hunters have access to private property. Like other user-groups that depend on access to public lands to engage in their recreational pursuits, many hunters in North Carolina would not have a place to hunt but for the Game Lands system.

We agree with the WRC’s statement in its 2013 resolution that “Sunday hunting is an effective means of recruiting new hunters and retaining current hunters by effectively doubling the number of hunting days for youths during the school year while providing additional options for hardworking adults with limited weekend hunting opportunities.” We further believe that providing Sunday hunting opportunities for public lands hunters is important for supporting efforts to recruit the next generation of hunters and therefore support access parity between private land and public land hunters on Sundays.

Economic Benefits
Hunters in North Carolina are significant contributors to the state’s economy; they spend more than $650 million every year and support more than 9,370 jobs across the state. Expanding Sunday hunting opportunities on Game Lands from Murphy to Manteo would further benefit North Carolina’s economy.

As the WRC cited in its resolutions in 2013, 2015, and 2017, North Carolinians travel to neighboring states where Sunday hunting is permitted and generate economic activity outside of North Carolina instead of spending their dollars in state. Allowing Sunday hunting on Game Lands would help retain in-state hunters and also attract out-of-state public land hunters that are currently disincentivized from planning a weekend hunting trip to North Carolina. An additional day to hunt on 2 million acres of Game Lands would mean more dollars spent by hunters in restaurants, hotels, and other businesses located throughout the state.

Hunter-Generated Conservation Funding Supports the Game Lands System
North Carolina’s more than 335,000 hunters should have equal access to Game Lands seven days a week. In addition to paying taxes like other user-groups, hunters help finance Game Lands acquisitions and management through the American System of Conservation Funding by purchasing hunting licenses and paying excise taxes on hunting-related equipment. As you know, this “user-pays, public-benefits” structure generates significant funding for conservation (more than $31.28 million in 2017 and more than $586 million in total) and has enabled the WRC to
acquire Game Lands from the mountains to the coast. Given this longstanding commitment to conservation, and to supporting and expanding the Game Lands system, we believe it is more than appropriate for hunters to have access to these lands for Sunday hunting.

Hunters are also one of the few user-groups in North Carolina that are required to purchase a Game Lands License to utilize Game Lands (Game Lands Licenses are also required for trapping, dog training, and field trials). Anglers, hikers, bikers, geocachers, and other users are not required to purchase a privilege license to access Game Lands, yet hunters are the only user-group that is restricted from accessing Game Lands on Sundays.

**Potential Opposition to Sunday Hunting on Game Lands**

Sunday hunting has a successful track record in North Carolina and in nearly every state across the country. In North Carolina, Sunday hunting has occurred on private lands with archery equipment since 2010 without conflict, and Sunday hunting has occurred on private lands with firearms since 2015 without conflict. Public land Sunday hunting is legal in some capacity in 46 states, including the adjacent states Georgia, Tennessee, and Virginia. Sportsmen and women in North Carolina hunt on Game Lands six days of the week (save for three-day-a-week designated Game Lands) without significant conflict with other user-groups, and we believe that hunting can also take place on Sundays on Game Lands without significant conflict with other user-groups.

While we can appreciate the WRC’s responsibility to manage the use of Game Lands for multiple user-groups, we believe that Game Lands management should be prioritized for the agency’s primary constituency, sportsmen and women. While nonconsumptive user-groups may have concerns with Sunday hunting on Game Lands, it is important to note that hunting seasons generally occur in colder months when nonconsumptive user rates are lower compared to other times of the year. As the experience in 46 other states has shown us, opposition to expanding Sunday hunting on public lands is based more on perceptions than reality, and we are confident that Sunday hunting can successfully be implemented on Game Lands in North Carolina with little issue.

Additionally, we are willing to help educate nonhunters about the economic and conservation funding contributions of hunters as well as the myriad other benefits of hunting, and we are also more than willing to assist with educational outreach to other user-groups to dispel any myths about hunting in general or allay any perceived fears about Sunday hunting on Game Lands. Please let us know how we can be helpful in any educational campaigns.

**Process**

As the WRC moves forward with rulemaking to propose opening Sunday hunting on specific Game Lands, we respectfully ask that you include hunting conservation organizations in the process. We are particularly interested to see the analysis from the polling that the WRC conducted this summer to examine public opinions regarding Sunday hunting on Game Lands, and we further request that the WRC delineate the process by which it will determine whether to recommend a Game Lands for Sunday hunting or not. At this stage, we do not have a clear understanding of
which factors the WRC will consider in its evaluation of Game Lands to recommend for Sunday hunting.

Specifically, we strongly support opening Sunday hunting on:

(a) Game Lands owned by the WRC and managed as six-day-per-week areas;
(b) Game Lands owned by the WRC and managed as permit-only areas;
(c) Game Lands leased by or managed cooperatively by the WRC and managed as six-day-per-week areas unless doing so would risk landowner unenrollment from the Game Lands system; and
(d) Game Lands leased by or managed cooperatively by the WRC and managed as permit-only areas unless doing so would risk landowner unenrollment from the Game Lands system.

Further, we particularly support opening Sunday hunting on all U.S. Forest Service and U.S. Fish and Wildlife Service properties in North Carolina.

In closing, we want to reiterate our gratitude to the WRC for their work over the years to expand Sunday hunting opportunities for North Carolina’s sportsmen and women and also offer any assistance that the WRC may find helpful with efforts to educate the public about Sunday hunting. Increasing access for hunters is critical to supporting North Carolina’s outdoor heritage, and we see no reason to not open as many Game Lands as possible in the next rulemaking cycle to effectuate the intent of the “Outdoor Heritage Enhanced” legislation that was signed into law in 2017.

Respectfully,

Congressional Sportsmen’s Foundation
Delta Waterfowl
National Deer Alliance
National Rifle Association
National Shooting Sports Foundation
Quality Deer Management Association
Safari Club International
Sportsmen’s Alliance

cc: WRC Commissioners
North Carolina Legislative Sportsmen’s Caucus