



November 13, 2021

To: New York Department of Environmental Conservation
625 Broadway
Albany, NY 12233

Re: Opposition of Proposed Amendments to 6 NYCRR Part 1.11(a)(2) – Amendments to Deer Hunting Seasons

Commissioner Basil Seggos,

The undersigned organizations, representing a wide cross-section of the sportsmen and women of New York, fundamentally oppose the proposed amendments to 6 NYCRR Part 1.11(a)(2). These amendments would allow counties to opt out of a prescribed hunting season, setting a dangerous precedent that allows local elected officials, rather than the wildlife management professionals at the New York Department of Environmental Conservation (DEC) to dictate hunting seasons. **As such, we respectfully submit that you do not issue the proposed amendments to 6 NYCRR Part 1.11(a)(2)**, as they would result in the DEC ceding part of its management authority, thereby hindering its ability to effectively manage wildlife within the state of New York, work which presently benefits all fish and wildlife species and citizens of the Empire State.

Maintaining the DEC's authority to effectively manage game population is prudent for a variety of reasons. The first reason is the fact that the DEC, not individual counties, is in the best position to make sound, science-based management decisions. For more than a century, the DEC and its predecessor have been the driving force behind New York's on-the-ground conservation efforts that have resulted in healthy wildlife populations. The Department is composed of a force of highly-educated and widely-experienced staff, which includes biologists, policy experts, and support and enforcement personnel – all of which have an instrumental role in determining the appropriate season dates and bag limits. Seasons and bag limits are determined by scientific and best management models, looking at the health of game populations not just in a region, but statewide as well. The proposed amendments to 6 NYCRR Part 1.1(a)(2), which are a result of political pressure, would prevent the DEC from making localized, science-based decisions by allowing elected officials in counties to decide whether the DEC can have full access to their array of season specific wildlife management tools, such as hunting. This could prove detrimental to the DEC's overall herd management strategies and have far-reaching impacts on other game management decisions across the state.

Additionally, the DEC has science-based adaptive management models that allow for changing with conditions in real-time. Evaluating the many variables that go towards setting hunting seasons, and working alongside the inter-departmental staff highlighted above, the DEC, through its regulatory process, is currently able to shorten or expand the season to ensure healthy, stable game populations.

Similarly, the Department is the most well-informed entity on current harvest rates and may be able to increase or decrease bag limits, should there be a need. This is why it is critical that the DEC continue to manage wildlife unencumbered by external pressures and relying on the best scientific data.

License sales are a critical component of the unique “user pays – public benefits” structure known as the American System of Conservation Funding (ASCF), in which these funds, in conjunction with excise taxes on sporting-related goods, are the lifeblood of state fish and wildlife agencies, such as the DEC. Just last year, New York’s sportsmen and women contributed \$69.05 million for conservation through this system. These critical conservation dollars fund a variety of efforts, including enhanced fish and wildlife habitat, recreational access to public and private lands, shooting ranges and boat access facilities, wetlands protection and its associated water filtration and flood retention functions, and improved soil and water conservation – all which benefit the public at large, not just sportsmen and women. These proposed amendments would limit public access for sportsmen, who are the driving force behind conservation.

Practicality must also play a role in determining the feasibility of these proposed amendments. Allowing counties to opt out of the holiday hunt ignores the DEC’s existing wildlife management framework, which is divided across the state into Wildlife Management Units (WMUs). These WMUs transcend county and city boundaries because they are geared towards the DEC’s mission – managing wild game populations. As the amendments currently stand, a county could “opt out” of the holiday hunt, meaning a patchwork of the existing WMUs would be eligible for hunting while others are not, often without county boundaries being marked. This action could be detrimental to hunters who accidentally cross a county line while remaining within the WMU, which then complicates enforcement matters for the DEC.

In closing, the proposed amendments to 6 NYCRR Part 1.11(a)(2) have the very real potential of negatively impacting the conservation work of the DEC, as well as negatively impact the funding source on which it relies. For these reasons, we are expressing our strong opposition to this measure and encourage the DEC to maintain full regulatory authority and reject the political pressures to adopt these amendments.

Thank you for considering our comments on this matter.

Respectfully Submitted,

Congressional Sportsmen’s Foundation
Ducks Unlimited, Inc.
National Wild Turkey Federation
New York Conservation Fund Advisory Board
New York Crossbow Coalition
New York 4-H Shooting Sports
New York Sportsmen’s Advisory Council
New York State Conservation Council
Safari Club International New York State Chapters