



21 January, 2021

Pennsylvania Board of Game Commissioners
2001 Elmerton Avenue
Harrisburg, PA 17110-9797

Dear Commissioners:

On behalf of the National Deer Association (NDA), I am writing to state our support for multiple proposals to be placed on the agenda for the board's upcoming January 23 meeting. NDA is a national non-profit conservation organization with a mission to ensure the future of wild deer, wildlife habitat and hunting. One of our primary focus areas is policy and advocacy that impacts deer and hunting.

Specifically, we support the proposed regulations to allow eLicenses to be carried afield as an alternative to paper licenses, the proposal to remove the limitation on the number of antlerless deer licenses for which hunters can apply, including the proposed restrictions, the proposed change to extend by two months the application period for enrollment in the Deer Management Assistance Program (DMAP), and the adopted regulations to expand the Pennsylvania Game Commission's (PGC) response to address all wildlife diseases through executive order.

The use of eLicenses provides a modern and convenient method for hunters to ensure that they always have the appropriate licenses and tags while afield. Modern technology makes such a license quickly accessible and provides for quick validation by law enforcement. Further, maintaining the option of printing a copy of eLicense products will appease hunters who prefer a physical license or who want the peace of mind of a back-up copy, should their electronic device fail.

Expanding the 'personal limit' on the number of antlerless deer licenses a hunter may possess at any given time to 4 will help ensure that the quota of antlerless licenses allocated to the various WMUs across the state are issued to the fullest extent possible to achieve the harvest goals behind the original allocations. Importantly, the proposal maintains the current conventional preseason application structure for mailed antlerless deer license applications, ensuring the equitable and fair distribution of antlerless licenses for hunters. The new proposal would simply make available licenses not sold during the three-structure process to over-the-counter purchases in early September. Ensuring that hunters who want to harvest multiple does have that opportunity, while maintaining equitable processes for antlerless license acquisition, is a win-win for both hunters and the agency.

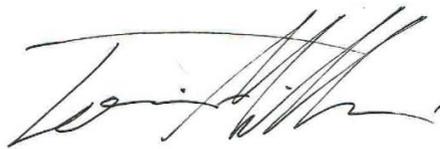
Extending the application period for enrollment in DMAP by two months provides needed time for landowners to collect post-winter data, analyze the data, and incorporate those results into DMAP applications. The DMAP program is incredibly popular among landowners and hunters, and it greatly aids the PGC in managing antlerless populations and increasing hunter opportunity across the state.

Finally, the adopted rulemaking to expand the PGC's response to address all wildlife diseases through executive order is appropriately aimed at ensuring sustainable deer herds and hunting opportunities into the future, and the authority to utilize the outlined tools and methods to accomplish these goals have been shown to be appropriate and effective. For instance, allowing the taking of wildlife without

regard to established seasons and bag limits and methods of take, requiring mandatory disease testing or disposal of wildlife or wildlife parts, prohibiting the feeding of wildlife, and prohibiting the movement of high-risk wildlife parts are all considered best management practices available for slowing the spread of chronic wasting disease (CWD). We applaud board's adoption of these rules and its aggressive approach to managing CWD and other wildlife diseases in Pennsylvania.

Finally, we support the board's inclusion of hunters and other stakeholders in the deer and wildlife management process. We urge the board to continue to increase stakeholder understanding of, support for, and participation in deer and wildlife management efforts in the state. NDA stands ready to help the board, hunters, and all Pennsylvanians work together to ensure the future of wild deer, wildlife habitat and hunting.

Sincerely,

A handwritten signature in black ink, appearing to read "Torin Miller", with a stylized flourish at the end.

Torin Miller
Director of Policy