



22 December, 2020

Commissioner Basil Seggos  
NYSDEC  
625 Broadway, 5<sup>th</sup> Floor  
Albany, New York 12233-4754

RE: Request for proposal to extend legal deer hunting hours in New York

Dear Mr. Seggos:

On behalf of the National Deer Association (NDA), I am writing to submit our comments regarding the New York State Department of Environmental Conservation's (DEC) recently released draft white-tailed deer management plan, which will guide the state's deer management efforts from 2021-2030. We are pleased that DEC has introduced a deer management plan that manages deer populations at levels that are appropriate for human and ecological concerns and promotes and enhances deer hunting as an important recreational activity, tradition, and population management tool in New York.

Among the plan's provisions is a proposal introduced by the NDA earlier this fall. With the support of our New York members, we asked DEC to extend legal hunting hours in New York from one half hour before sunrise to one half hour after sunset, and we are encouraged to see that this proposal has made it into the draft plan. As DEC notes in the plan, New York is the only state that limits deer hunting to between sunrise and sunset. Further, there is no data to show that hunting prior to sunrise or after sunset results in an increased risk to safety. We reviewed data on hunting accident rates that show hunting during this time is safe and appropriate for all hunters, and New York currently allows it for other game species (turkey, waterfowl, etc).

Other provisions that NDA supports are plans to:

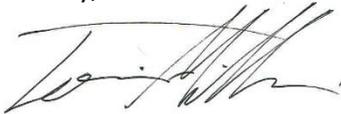
- promote landowner-hunter cooperatives for voluntary implementation of specialized deer management programs on private land;
- explore the feasibility of programs to improve private land access for deer hunting and assist with implementation of programs deemed to be the most effective;
- work with deer management assistance program (DMAP) permit recipients to evaluate program effectiveness for meeting their goals;
- host or participate in public meetings and webinars to inform the public about the positive social, economic, and ecological impacts of deer hunting and the negative social, economic and ecological impacts of overabundant deer populations; and
- stress the importance of habitat conservation with outreach efforts to various segments of the public including farmers, educators, hunters, forest landowners and managers, and community land planners, and develop materials to aid in outreach efforts.

One measure that some look to NDA for our position on regularly is advancing buck age structure. In the draft plan, DEC proposes to evaluate mandatory antler point restrictions (APRs) to determine if they're working as-is, working well-enough to go to a voluntary system or not working at all. While we continue to advocate for provisions that ensure a balanced adult buck age structure in all states, we fully support DEC conducting an objective review of its regulations. The plan also outlines an attempt to regain regulatory authority over APRs. Currently, DEC has imposed a mandatory regulation, but the legislature has also passed a statute imposing the same. These measures are duplicative, the statute is unnecessary and DEC should have rulemaking authority over deer management. NDA will always advocate that state wildlife agencies are better suited to make deer management decisions than are state legislatures.

To summarize, NDA urges DEC to extend legal hunting hours in New York from one half hour before sunrise to one half hour after sunset as outlined in our early proposal, and we fully support the agency's outlined plans listed above, DEC taking an objective look at APRs and other regulations, and agency regaining full regulatory authority over APRs as proposed.

NDA appreciates and supports DEC's inclusion of hunters and other stakeholders in the deer management process, and we stand ready to help DEC and New York hunters to ensure the future of wild deer, wildlife habitat and hunting in New York.

Sincerely,

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

Torin Miller  
*Director of Policy*