



STATE OF DELAWARE
DEPARTMENT OF NATURAL RESOURCES &
ENVIRONMENTAL CONTROL
DIVISION OF FISH & WILDLIFE
89 Kings Highway
Dover, DE 19901

**OFFICE OF THE
DIRECTOR**

**Phone: (302) 793-9910
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MEMORANDUM

TO: Members of the 148th General Assembly

THROUGH: David S. Small, Secretary 

FROM: David E. Saveikis, Director 

DATE: May 2, 2016

SUBJECT: Division of Fish & Wildlife Fees, Wildlife Program

The purpose of this memorandum is to inform the General Assembly, as required under Section 95 of Epilogue to the FY '16 Bond Bill, of recent DNREC, Division of Fish & Wildlife activity related to wildlife program fees. Pursuant to this activity, the agency is seeking to increase such fees with the approval of the General Assembly through legislation.

Section 95 authorizes the Department, following adequate opportunity for public input and approval of the appropriate advisory council(s) and Secretary, to establish fees to defray the expenses of activities or services. Any fee or fee increase associated with hunting, trapping or fishing and under the management authority of the Division of Fish & Wildlife must also receive the approval of the General Assembly before becoming effective. The actual Section 95 language is attached for your reference.

Our efforts involved wildlife program services and revenues and associated fees, specifically associated existing hunting and trapping license fees and establishment of a new Conservation Access Pass user fee to access the division's public wildlife areas. Adequate opportunity for public input was provided through three public workshops, one in each county, held in early January of 2016, attended by nearly 300 members of the public.

Extensive information was presented by the division at these workshops regarding wildlife program services, funding and associated fee revenues, including the attached fact sheet entitled "Wildlife Program Services and Funding." This attached fact sheet includes the "business case" and need for additional revenues, the impacts of insufficient wildlife program funding, how state license revenues are used to leverage and secure federal funding, and how additional state/federal funding could be used to restore and enhance wildlife conservation and hunting opportunities

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through Science and Service***

statewide and public access facilities on state wildlife areas. Possible fee increases and a new fee category, a Conservation Access Pass to access the division's public wildlife areas, were also presented by the division. Extensive public input was received during these workshops, including public opinion data obtained from distributed questionnaires.

The Council on Game and Fish held a special public meeting to consider the possible wildlife program fee increases on January 26, 2016, attended by 26 members of the public, many of which provided comment to the council. The division presented the following information at the council meeting:

- A summary of public input from the workshops held earlier in January, including that nearly 60% generally supported the presented hunting and trapping fee increases and 75% generally supported the presented new Conservation Access Pass model and fee structure.
- Two alternate fee increase proposals developed based on public input provided at the workshops held earlier in January.

After considering information provided by the division and comment from the public, the council approved fee Alternative B by a vote of 5 yes, 1 no and 0 abstentions (quorum in attendance, chair not voting) with slight modification by increasing the presented fee amount for the Annual Group Guide Conservation Access Pass. The single no vote was due to a preference for fee Alternative A, with the council's vote therefore essentially representing a unanimous vote for a wildlife program fee increase.

Subsequent developments resulted in changing the Conservation Access Pass model from that of primarily an *individual* access pass to a *vehicle* access pass model and fee structure, which was presented by the division to the Council on Game and Fish at the council's March 29, 2016 meeting attended by 21 members of the public, many of which provided comment to the council. After considering information provided by the division and comment from the public, the council approved the Vehicle Conservation Access Pass model and fee structure by a unanimous vote of 4 yes, 0 no and 0 abstentions (quorum in attendance, chair not voting).

Illustrative examples of hunting and trapping license fee increases and the new Vehicle Conservation Access Pass fee category approved by the Council on Game and Fish include:

- Resident Annual Hunting License: \$25.00 to \$39.50
- Non-resident Annual Hunting License: \$130.00 to \$199.50
- Waterfowl Stamp: \$9.00 to \$15.00
- Conservation Access Pass (for non-hunter vehicles accessing state wildlife areas; free pass issued with hunting license)
 - Resident Annual \$32.50
 - Non-resident Annual \$65.00
 - Resident 3-day \$10.00
 - Non-resident 3-day \$20.00

Based on meeting the requirements and intent of Section 95 of Epilogue to the FY '16 Bond Bill, the division has developed legislation for consideration by the General Assembly to increase most existing hunting and trapping license fees and to establish a new fee category of a Vehicle Conservation Access Pass user fee for *non-hunters* to access the division's public wildlife areas, specifically implementing that which was approved by the Council on Game and Fish. A copy of the draft legislation is attached for your reference.

Several conservation organizations support a wildlife program fee increase, with copies of their respective letters of support attached for your reference. The National Rifle Association and the Delaware State Sportsmen's Association have also publicly stated support for a wildlife program fee increase.

Please free to contact us if you have any questions or for additional information. Thank you for considering increased revenues needed to provide wildlife conservation and wildlife program services.

Attachments

Fiscal Year 2016 Bond Bill
Section 95 of Epilogue

8 **Section 95. Revenues.** DNREC, following adequate opportunity for public comment and the approval of the
9 appropriate public advisory council(s) and Secretary, may establish, for activities and services administered by the
10 department, such appropriate fees as shall approximate and reasonably reflect costs necessary to defray the expenses
11 of each such activity or service. There may be a separate fee charged for each service or activity, but no fee shall be
12 charged for a purpose not specified in the appropriate chapter of the Delaware Code. At the beginning of each calendar
13 year, the department shall compute the appropriate fees for each separate activity or service and provide such
14 information to the General Assembly. All revenue generated by any of the activities or services performed by the
15 department shall be deposited in the appropriated special fund account. These funds shall be used to defray the
16 expenses of the department, but may not exceed the budget authority for any fiscal year. Any fee or fee increase
17 associated with hunting, trapping or fishing and under the management authority of the Division of Fish and Wildlife
18 must also receive the appropriate approval by the General Assembly before becoming effective.



Delaware Division of Fish & Wildlife Wildlife Program Services and Funding



How are wildlife program services funded?

The Division of Fish & Wildlife's wildlife program services are primarily funded through Federal Pittman-Robertson (PR) grants generated by excise taxes on firearms and hunting equipment. PR grants require the Division to provide matching funds at \$1 (State) to every \$3 (Federal). Hunting and trapping license revenues are the main source of matching funds for Federal PR grants. 50-75% of the wildlife program operating budget depends on license revenues combined with Federal PR funds.

Why is an increase in fees necessary?

Additional revenues through a fee increase are needed to restore/enhance wildlife program services and prevent further program service reductions.

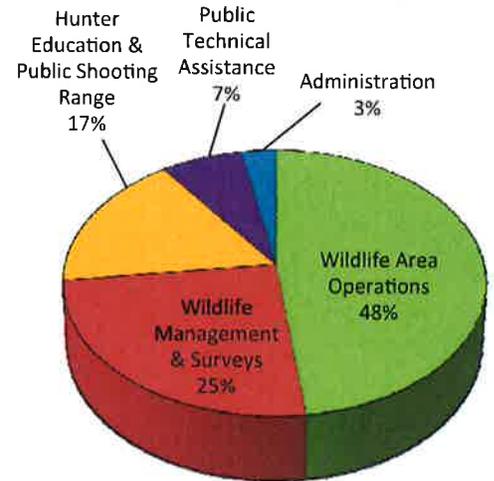
Due to declines in hunting and trapping license purchases/revenues and a reduction in wildlife program state General Funds, insufficient revenues are available to match available Federal PR funding for wildlife conservation and State Wildlife Area habitat management and access services. Not all State Wildlife Area users currently pay fees for management of State Wildlife Areas.

Comprehensive wildlife program services are limited by a projected license revenue shortfall of nearly \$550,000 in FY '17, which prevents matching \$1.1M in Federal PR grants, for a total lost funding opportunity of \$1.65M/year. ***Without sufficient state match funds, some Federal PR funds paid by Delaware hunters through excise taxes could be redistributed to other states.***

An increase in fees is being considered for hunting and trapping licenses, along with establishing a Conservation Access Pass, which would be required for anyone using State Wildlife Areas.

What has the wildlife program done to work within our budget?

- Identified additional \$200,000/year of eligible funding to match Federal PR funds
- Reduced staff (5 full-time positions vacant; 70% fewer seasonal employees)
- Reduced days/hours at the Ommelanden Shooting Range
- Eliminated wildlife food plots and reduced dove hunting sunflower plantings
- Closed access to State Wildlife Areas before and after hunting seasons to reduce road maintenance costs
- Reduced the number of days State Wildlife Areas are open to permit hunting
- Reduced or eliminated other maintenance/operational activities at State Wildlife Areas



Wildlife Program Services & Funding Distribution

More Bang for Your Buck!

Additional revenues through a fee increase provides an opportunity to deliver value-added services which could:

Restore Wildlife Program Services

- Ommelanden Shooting Range, wildlife food plots and dove sunflower plantings, Wildlife Area access and maintenance

Expand Statewide Hunting Seasons

- Establish limited afternoon turkey hunting
- Expand certain hunting opportunities or seasons (e.g., deer, gray squirrel)
- Establish a second youth deer hunting day (for September)

Improve Habitat on State Wildlife Areas

- Upland and wetland habitat for a variety of wildlife species
- Impoundment management by a dedicated manager to enhance habitat, hunting and wildlife watching

Expand Hunting/Trapping Opportunities on State Wildlife Areas

- Open additional areas for certain types of hunting (e.g., agricultural fields for goose hunting)
- Expand trapping opportunities (earlier marsh trapping; fox, raccoon and coyote trapping to increase small game populations, benefitting hunters and trappers)
- Establish Mentored Hunt days in dedicated portions of State Wildlife Areas

Expand Wildlife Viewing Opportunities on State Wildlife Areas

- Wildlife viewing platforms, trails, parking, etc.
- Open additional sections for wildlife watching

Proposed bill
148th GENERAL ASSEMBLY

AN ACT TO AMEND TITLE 7 OF THE DELAWARE CODE RELATING TO LICENSES.
BE IT ENACTED BY THE GENERAL ASSEMBLY OF THE STATE OF DELAWARE
(Three-fifths of all members elected to each house thereof concurring therein):

Section 1. Amend Chapter 5, Subchapter I, Title 7 of the Delaware Code by making insertions as shown by underlining as follows:

SUBCHAPTER I

HUNTING, TRAPPING AND FISHING LICENSES, TAGS, STAMPS AND PUBLIC LANDS
USE FEES

Section 2. Amend § 504, Title 7 of the Delaware Code by making deletions as shown by strike through and insertions as shown by underlining as follows:

§ 504. License fees for residents; additional ~~permits~~ tags.

(a) Residents shall pay to the Department or its duly authorized agents the following license fees:

- (1) ~~\$25~~ \$39.50 for a general hunting license.
- (2) ~~\$3.50~~ \$10 for a trapping license.
- (3) \$8.50 for a general fishing license.
- (4) \$40 for a boat fishing license for a boat 20 feet or less, \$50 for a boat fishing license for a boat greater than 20 feet.
- (5) \$5.00 for junior hunting license for a resident age 13 through 15 with the criteria for issuing the ~~permit~~ license established by the Department pursuant to § 103 of this title.
- (6) \$100 for a fishing guide license and \$159.50 for a hunting guide license.

(b) ~~During any deer season~~ ~~the~~ Department may issue an additional ~~permit tag or tags~~ to kill ~~a single~~ deer. The criteria for issuing the ~~permit tag or tags~~ shall be established by the Department pursuant to § 103 of this title. The amount charged for each ~~permit tag or set of tags~~ shall be ~~\$10~~ \$20.

(c) Vessels for hire shall pay to the Department or its duly authorized agents the following license fees:

- (1) \$150 for a charter boat, as defined in § 906(9) of this title, license; and
- (2) \$300 for a head boat, as defined in § 906(36) of this title, license.

Section 3. Amend § 508, Title 7 of the Delaware Code by making deletions as shown by strike through and insertions as shown by underlining as follows:

§ 508. License and tag fees for nonresidents.

(a) Nonresidents shall pay to the Department or its duly ~~constituted~~ authorized agents the following license fees:

- (1) ~~\$130-\$199.50 or once agents can access online reciprocal fees the higher of the 2~~ for a general hunting license.
- (2) ~~\$25-\$75~~ for a trapping license.
- (3) \$20 for a general fishing license.
- (4) \$12.50 for a 7-day fishing license (good for 7 consecutive days ~~from the date of issuance~~).
- (5) ~~\$50-\$75~~ for a 3-day small game hunting license good for 3 consecutive days ~~from the date of issue~~ and not valid for hunting deer or turkeys.
- (6) ~~\$10-\$20~~ for an each additional ~~permit~~ tag to kill a single antlerless deer.
- (7) ~~\$25-\$50~~ for a tag to kill a single antlered deer.
- (8) ~~\$25-\$50~~ for a tag to kill a single quality buck.
- (9) Vessels for hire shall pay to the Department or its duly authorized agents the following license fees:

- a. \$300 for a charter boat, as defined in § 906(9) of this title, license; and
- b. \$600 for a head boat, as defined in § 906(36) of this title, license.

- (10) \$40 for a boat fishing license for a boat 20 feet or less, \$50 for a boat fishing license for a boat greater than 20 feet.
- (11) \$50 ~~or once agents can access online reciprocal fees the higher of the 2~~ for a nonresident junior hunting license for a nonresident age 13 through 15.
- (12) \$300 for a fishing guide license and \$475 for a hunting guide license.

(b) The criteria for issuing a ~~permit~~ tag pursuant to this section shall be established by the Department pursuant to § 103 of this title.

Section 4. Amend § 511, Title 7 of the Delaware Code by making deletions as shown by strike through and insertions as shown by underlining as follows:

§ 511. Licensing agents; bond requirement; service charge; regulations.

(a) The Department may authorize as many qualified persons as licensing agents as it deems necessary to effectuate the efficient distribution of the licenses, permits, tags, passes and stamps authorized by subchapter I of this chapter.

(b) Licensing agents shall be required by the Department to give security by means of a bond in the penal sum of \$5,000, conditioned for the faithful performance of their duties and for the prompt and correct remittance to the Department of the moneys received from the sale of licenses, permits, tags, passes and stamps.

(c) Licensing agents may add a service charge to the required fee for a license, permit, tag, pass or stamp, provided the service charge does not exceed \$1.50 for a license, \$1.50 for a permit, \$1.50 for a tag, \$1.50 for a pass or \$1.00 for a stamp. Such service charges, if imposed, shall be posted by the licensing agent and shall be clearly visible to prospective purchasers.

(d) Notwithstanding subsection (c) of this section, a licensing agent offering automated licensing may be authorized by the Department to add a service charge of up to \$4.00 to the required fee for a license, ~~permit or stamp~~. License, ~~permit and stamp~~ applicants, prior to their purchase of licenses, ~~permits and/or stamps~~ through an automated system, shall be notified of the applicable service charge ~~or charges~~.

Section 5. Amend § 517, Title 7 of the Delaware Code by making deletions as shown by strike through and insertions as shown by underlining as follows:

§ 517. Migratory waterfowl stamp.

(a) As used in this section:

(1) "Division" means the Division of Fish and Wildlife of the Department of Natural Resources and Environmental Control.

(2) "Migratory waterfowl" means a wild goose, brant or wild duck.

(3) "Stamp" means the migratory waterfowl stamp provided for by this section.

(b) Except as otherwise provided herein, no person may hunt or take any migratory waterfowl within this State without first procuring a migratory waterfowl stamp as provided for by this section. Such stamp must be in the possession of every person when hunting or taking any migratory waterfowl. Each stamp shall be validated by the signature of the licensee written across the face of such stamp. Such stamp shall be designed and produced in accordance with Division regulations and shall expire annually on the same date each year that all hunting licenses expire. Unless otherwise provided in this chapter, any person who is exempt from payment or charge for a hunting license shall also be exempt from the fee imposed by this section. Any person who is under the age of 16 years shall be exempt from the requirements of this subsection.

(c) A stamp shall be issued to each hunting license applicant upon written request on the forms furnished by the Division and payment of a fee of ~~\$9.00~~ \$15.00, together with any Licensing Agent fees charged in accordance with this chapter.

Section 6. Amend § 521, Title 7 of the Delaware Code by making deletions as shown by strike through and insertions as shown by underlining as follows:

§ 521. Public lands use ~~blind site fees; blind site permit, conservation access pass.~~

(a) Whoever utilizes a blind site on public lands managed by the Division of Fish and Wildlife and included in the Division's lottery program for the purposes of hunting waterfowl or deer shall pay an annual blind site permit fee of \$20. This fee is hereby waived for hunters participating in Division of Fish and Wildlife designated youth hunting days.

(b) Notwithstanding subsection (b)(1) of this section, a Conservation Access Pass that serves as a permit is required for any registered motor vehicle as defined in Title 21 used to access public lands owned or managed by the Division of Fish and Wildlife for any, as determined by the Department, allowable activity. Such pass shall be displayed by the motor vehicle operator on or within said vehicle in a manner as specified by the Department. Such pass shall be assigned and limited to a single, specified registered motor vehicle, and may be transferred to another registered motor vehicle of same ownership for a fee of \$10.00 paid to the Department.

(1) A Conservation Access Pass shall not be required to access:

a. The Michael Castle Trail and those associated direct access roads and parking areas designated by the Department within the C&D Canal Conservation Area.

b. Those fishing or boating access areas, educational facilities or shooting range facilities designated by the Department.

c. Applicable lands leased from the Department, provided access is for the purpose for which such lands are leased.

d. Other areas designated by the Department.

(2) An annual Conservation Access Pass shall be issued free of charge with resident and nonresident general licenses, resident and nonresident hunting guide licenses, and nonresident 3-day small game hunting licenses.

(3) The following Conservation Access Pass fees shall be paid to the Department or its duly authorized agents:

a. \$32.50 for a resident annual pass.

b. \$10.00 for a resident three (3) day pass valid for three (3) consecutive days.

c. \$65.00 for a nonresident annual pass.

d. \$20.00 for a nonresident three (3) day pass valid for three (3) consecutive days.

(c) All funds received from the purchase of Conservation Access Passes shall be deposited and administered in accordance with §§ 105 and 107 of this title solely for wildlife-associated user access facilities and projects on and the management and maintenance of subject public lands.

Section 7. Amend § 529, Subchapter II, Title 7 of the Delaware Code by making deletions as shown by strike through and insertions as shown by underlining as follows:

SUBCHAPTER II
RAW FUR DEALERS

§ 529. License fees.

A resident of Delaware shall pay to the Department a fee of ~~\$28.75~~ \$50.00 for a license under § 528 of this title. A nonresident of Delaware shall pay a fee of ~~\$287.50~~ \$475.00 for such a license.

Section 8. Amend § 543, Subchapter III, Title 7 of the Delaware Code by making deletions as shown by strike through and insertions as shown by underlining as follows:

SUBCHAPTER III
BREEDERS OF GAME ANIMALS OR BIRDS FOR
COMMERCIAL PURPOSES

§ 543. License fee; qualification of licensee; ~~nontrans-ferability~~ nontransferability.

A fee of ~~\$11.50~~ \$17.50 shall be paid to the Department for a license under this subchapter which shall be issued only to citizens of the United States and which shall not be transferable.

Section 9. Amend § 566, Title 7 of the Delaware Code by making deletions as shown by strike through and insertions as shown by underlining as follows:

§ 566. License to operate preserve; fee; term; renewal; regulations of Department.

The Department, upon payment to it of a fee of ~~\$25~~ \$39.50, may issue annual licenses, good for 1 calendar year, renewable annually in the discretion of the Department for a like period, upon payment of a like fee, to persons, clubs or associations, authorizing the holders thereof to carry on, pursuant to regulations issued by the Department in furtherance of the purposes of this subchapter, propagating, holding, raising, releasing and shooting of rabbits and game birds, such as but not limited to pheasant, grouse, quail and partridge, hereinafter sometimes referred to individually or collectively as game.

Section 10. This Act is effective July 1, 2017.

SYNOPSIS

This bill generates revenues needed for statewide wildlife conservation and for public access facilities on and the management and maintenance of public wildlife areas owned or managed by the Division of Fish and Wildlife by increasing fees for existing hunting and trapping licenses and by establishing a Conservation Access Pass to be purchased by non-hunters for motor vehicles accessing these public lands. A Conservation Access Pass would not be required to access certain such public lands to include the Michael Castle Trail portion of the C&D Canal Conservation Area, designated fishing or boating access, education or shooting range facilities, and lands leased from the division. Revenues generated under this bill would be leveraged to obtain federal grant funds at a ratio of \$1 state funds to \$3 federal funds, with

04/21/2016

current state wildlife program revenues insufficient to fully leverage available federal funds. The bill establishes a private license agent service charge for the sale of Conservation Access Passes similar to previously established service charges for the sale of hunting and trapping licenses. Additional changes clarify inconsistent and update obsolete language, primarily involving terminology used for existing fee categories. Fee increases and the Conservation Access Pass would be effective July 1, 2017.



January 2, 2016

David E. Saveikis, Director
Delaware Division of Fish and Wildlife
89 Kings Highway
Dover, DE 19901

Received, Fish & Wildlife

FEB 15 2016

Office of the Director

Dear Director Saveikis:

As North America's largest waterfowl and wetland conservation organization, we join the Delaware Advisory Council on Wildlife and Freshwater Fish in endorsing the Division of Fish and Wildlife's Alternative B proposal to raise hunting and trapping license fees as well as create a Conservation Access Pass. Ducks Unlimited represents approximately 6,500 members in Delaware and more than 700,000 waterfowlers nationwide who rely on the professional management of our natural resources to sustain healthy populations of wildlife, provide increased access to public lands and waters, and enforce wildlife laws. It is for this reason that it's critical to ensure that sufficient funds are available to the wildlife professionals of Delaware.

Sportsmen and women have shouldered the costs of science-based fish and wildlife management in this country for over 75 years and are America's original conservationists. Established in 1937 by the Federal Aid in Wildlife Restoration Act (Pittman-Robertson Act), a system was initiated to direct excise taxes on firearms and ammunition to a dedicated fund to be used specifically for conservation purposes. The US Fish and Wildlife Service disburses these dollars to the state fish and wildlife agencies to restore and manage wildlife habitat as well as open and maintain access for hunting and other outdoor recreation. Hunting and trapping license revenues are the main source of matching funds for these Federal grants so that state agencies to take advantage of these critical conservation dollars.

As mentioned in the public hearings, due to the rising costs of natural resource management and predicted license revenue shortfalls of nearly \$600,000, the Division of Fish and Wildlife is at risk of losing \$1.8 million in FY' 17 and having to implement additional cost-cutting measures that would negatively affect DU members and Delaware's sportsmen and women. DU is supportive of the Division's wildlife program and we are committed to ensure your operating funds are sufficient to maintain Delaware's wildlife and their associated habitats healthy and available for people to enjoy.

The Division's Alternative B proposal represents a fair dispersal of fee increases across the various hunting and trapping license types including increases to the resident and non-resident waterfowl stamp, which Ducks Unlimited proudly supports. Additionally, the Conservation Access Pass will act as a cost-sharing mechanism so that non-hunting/trapping users of wildlife areas will have to start paying for the management of these resources as hunters have always done.

Please feel free to share this letter and our support with decision makers as this process moves forward. We hope you are successful in strengthening the Delaware Fish and Wildlife Division's ability to deliver the on-the-ground conservation work that protects and enhances our state's outdoor heritage, and we stand with you in that effort.

Sincerely,

Matthew L. Biggs
DE State Chairman

Lou Caputo, Jr.
DE State Policy Chairman

Cc: Pete MacGaffin, Scott Crawford, Jake McPherson



January 26, 2016

Mr. Dave Saveikis
Division of Fish & Wildlife
DNREC
89 Kings Highway
Dover, DE 19901

Submitted by email

Dear Mr. Saveikis:

I am writing to express Delaware Wild Lands' support for developing a Conservation Area Pass and for increases in the hunting and trapping licenses, as described in the stakeholder workshop and community meeting (held on January 14, 2016).

Delaware Wild Lands (DWL) recognizes the costs of obtaining hunting and trapping licenses in Delaware are lower than in other proximate states and that significant investments are needed (financial, staff, and otherwise) to manage land and improve wildlife habitat. Further, we understand fees and licenses associated with consumptive uses are presently the only source of private-pay support for the acquisition, management, and restoration of Delaware's important wildlife habitat areas. Considering such, we support the proposed increases in the hunting and trapping licenses and the development and implementation of the Conservation Area Pass. In addition, we feel it is important to continue to provide opportunities for younger individuals to experience hunting and commend you for limiting increases for junior licenses. We also believe it appropriate to charge a nominal fee for senior licenses and encourage you to include that in future proposals relative to this topic.

If you have questions or need clarification, please not hesitate to contact me.

Thank you.

Sincerely,
Kate Hackett
Executive Director



DELAWARE CENTER FOR THE
INLAND BAYS
Research. Educate. Restore.

January 13, 2016

David Saveikis
DNREC -- Division of Fish & Wildlife
89 Kings Highway
Dover, DE 19901

Received, Fish & Wildlife

RE: Wildlife Program Services and Funding

JAN 19 2016

Dear David,

Office of the Director

On behalf of the Board of Directors of the Center for the Inland Bays, I am writing in support of the proposal to increase revenue to the Wildlife Program by \$600,000 to ensure receipt of a full portion of matching federal Pittman-Robertson funds in fiscal year 2017. This funding is essential to maintain and enhance management of Wildlife Areas. Maintaining adequate funding to manage and restore natural ecosystems within the Inland Bays Watershed supports the Inland Bays Comprehensive Conservation and Management Plan, of which DNREC is signatory.

The premier Wildlife Management Area within the Inland Bays Watershed is Assawoman. This area receives high visitation by residents and tourists seeking to experience and harvest wildlife from the Bays and their nearshore ecosystems. This Area in particular is facing increased management costs due to rising visitation, rising sea levels, and invasive plant species. Maintaining healthy coastal ecosystems in this Area will help protect both water quality and important game and non-game wildlife populations. Maintaining and enhancing access here will encourage residents to appreciate and protect the Inland Bays.

The Center supports increasing both license fees and establishing a Conservation Access Pass for those accessing Areas for purposes other than hunting. Care should be taken to ensure that licensed hunters also seeking to purchase a Pass are not experiencing excessive fee increases.

Conservation Passes should be purchasable online, both singularly and in coordination with license purchases. Instructions for purchase should be posted at Area entrances. It is suggested that Passes be able to be associated with a vehicle rather than an individual for ease of enforcement and to ensure that a group of occasional visitors is not deterred by high costs. For example, a car of four birdwatchers from Maryland accessing Assawoman for a morning should not have to pay a total of \$50, as proposed during DNREC's public workshops on the matter. Finally, fewer and fewer children have access to nature. Children should be provided with every opportunity to experience nature and those under 18 years should not need a Pass.

Thank you for your efforts. I hope these comments are helpful and I respectfully request that they be forwarded on to the Wildlife Council in preparation for their January 26 meeting.

Sincerely,

Chris Bason
Executive Director



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Brian P. Winslow

To: David Saveikis, DNREC Division Director of Fish and Wildlife

Re: The Delaware Nature Society response to DNREC's proposed Conservation Access Pass

David,

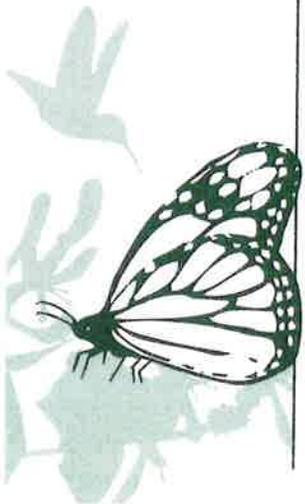
Delaware Nature Society represents over 6,000 members with the mission of improving the environment by connecting people to natural world through education, conservation, and advocacy. Thank you for the opportunity to comment on the Department of Natural Resources and Environmental Control's (DNREC) draft proposal regarding the establishment of a Conservation Access Pass. The Delaware Nature Society fully supports the Division of Fish and Wildlife's proposal of a Conservation Access Pass as a way to fulfill the ongoing shortfall of State General funds and license fees. As a leader of outdoor programming as well as a champion for connecting people to our natural environment, we believe adequate resources must be provided to maintain, restore, and when possible, increase services, trails, and areas of open space for outdoor recreational purposes.

While we are supportive of the idea of a Conservation Access Pass, Delaware Nature Society would also like the Department to consider the following when writing legislation and/or regulations related to the Pass:

- As a professional trip leader, Delaware Nature Society routinely leads birding and other environmental programs, where we take our participants into both State Parks and Fish & Wildlife Areas. The proposed requirement that each individual must have a conservation access pass, which would need to be purchased weeks if not months in advance of the program, presents detrimental inconveniences to any group or organization planning to conduct programming on Wildlife Areas. In order to ensure that DNS continues promoting the use of Wildlife Areas to our members, we encourage the Department to build the Conservation Access Pass program similar to the State Park structure with car based passes. While we understand that logistically, passes could not be purchased at the Wildlife Areas themselves for day trips, buying an annual car pass would be much more convenient for groups such as DNS and is an easily accessible and popular option for the public. Additionally, DNS encourages the Department to consider one day passes that can be purchased online the day of and be loaded on to smartphones for those individuals.
- As a private landowner that allows hunting of deer as a land management tool on our properties, DNS has grave concerns about allowing Sunday hunting. Sunday is the one day of the week from September 1st to January

EDUCATING TODAY. PRESERVING FOR TOMORROW.

Ashland Nature Center • Abbott's Mill Nature Center • Coverdale Farm Preserve • DuPont Environmental Education Center



31st that birders, photographers, hikers, and horseback riders can enjoy public lands without the potential conflict with hunting. In general, autumn is the single best time of year to observe wildlife in Delaware. To request that nonconsumptive users pay for access to Wildlife Areas but then further limit the time they can safely enjoy them is contradictory to the business model of the Division of Fish and Wildlife. Therefore, we request DNREC oppose any efforts to expand hunting to Sundays.

- We request that access to Wildlife Areas is not routinely prohibited or curtailed to the public without adequate notice or for reasons other than hunting. Areas such as the south pools of Ted Harvey have been closed without notice and will remain that way for long periods of time without explanation.

Thank you again for the opportunity to offer these comments.