



**BACKCOUNTRY
HUNTERS & ANGLERS**
NEW ENGLAND

January 15, 2025

Re: DFW Deer Hunting Regulations 321 CMR 2.00 and 321 CMR 3.02

Dear Director Tisa, Chairman Sears, and Members of the Fisheries and Wildlife Board:

Backcountry Hunters & Anglers (BHA) seeks to ensure North America's outdoor heritage of hunting and fishing in a natural setting. Our members advocate for access and opportunity to hunt and fish on public lands and science-based management of wildlife to ensure healthy fish and game populations persist on the landscape.

With these things in mind, we support the Division's proposed regulatory amendments to 321 CMR 2.0 and 321 CMR 3.02(4) and respectfully submit the following comments.

321 CMR 2.0

2.02: Permits to Take or Possess - Shed Antlers

BHA supports the clarification that possession of naturally shed antlers does not require a possession permit and that devices that facilitate the removal or collection of antlers is not permitted.

2.11: Display of Sporting, Hunting, Fishing, and Trapping Licenses

BHA supports the simplification of the archery and primitive firearms season stamp possession regulations by eliminating the need for a signature on the "stamp".

2.12: Artificial Propagation of Birds, Mammals, Reptiles and Amphibians - Sunset Captive Deer Facilities

BHA commends all the Division's efforts to reduce the risk of introduction of Chronic Wasting Disease to the Commonwealth's deer herd. Sunseting captive deer facilities will go a long way in mitigating that risk given the well documented role that captive cervid facilities in the spread of the disease across North America.



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2.15: Importation, Liberation, and Transportation of Fish, Amphibians, Reptiles, Birds, and Mammals - Expanding Deboning Requirements in Response to Chronic Wasting Disease.

BHA supports the proposed deboning requirements from states outside New England. These types of regulations have been one of the primary strategies to slow the spread of CWD by preventing the importation of the tissues with the highest prion concentrations.

321 CMR 3.02

3.02: Hunting, Particular Game. (4) Hunting and Tagging of Deer

- BHA supports the clarification that naturally growing vegetation does not constitute baiting.
- BHA welcomes the flexibility offered to youth hunters to utilize their tag on any day during the open season.
- BHA supports the creation of a Winter Primitive Season in Wildlife Management Zones 13 & 14. With Nantucket and Martha's Vinyard above 75 and 55 deer per square mile respectively, the added season will provide additional opportunity for hunters to reduce the number of deer on the landscape.

Thank you for your consideration of our comments and recommendations.

Sincerely,



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