



April 24th, 2026

NYS DEC  
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Re: Antlerless Deer Hunting

The New York Forest Owners Association (NYFOA) supports proposed regulation changes to 6 NYCRR Parts 1.11, 1.19, 1.20, 1.21, and 180.8 pertaining to deer hunting seasons, tags, and archery equipment as outlined in the March 18, 2026 NYS DEC Press Release. We view these changes—expanding antlerless deer harvest opportunities and incentivizing hunters to harvest does via "Earn-a-2nd-Buck"—as critical steps toward better addressing New York's deer overabundance crisis.

Management of deer in New York State is a critical issue across urban, suburban, and rural areas. An overabundance of deer is affecting agricultural crops from grains to grapes to Christmas trees and threatening regeneration of our important forests and woodlands. In addition to the detrimental effects over browsing has on the health of our ecosystems, deer are a primary vector for ticks. Where the deer population is high, the tick population is increased. As we know, ticks carry multiple bacterial diseases which we do not have cures for.

Forests and woodlands cover 18.5 million acres of New York's land and 75% of those lands are privately owned in 700,000 separate ownerships with 200,000 owners holding more than 10 acres of forest or woodland. Various management techniques are being used to limit deer damage. Fencing is being used for small, contained areas on some farms, woodlands, and Christmas tree plantations, but are cost-prohibitive across large areas. Larger Christmas tree and extensive timber harvest operations must depend on the DMP program to control deer damage. Creation of "walls" of slash and other debris in timber harvests can also be constructed in small areas. These are cost-prohibitive for large operations. Increasing hunter access and ability to harvest deer sustainably by increasing the number of DMP tags per hunter is an important step in further limiting the overpopulation of deer in certain areas.

In addition to these changes in hunting regulations, we urge the Department to pursue two additional steps:

1. Accelerate programs to educate hunters and the public about the economic and environmental importance of reducing deer abundance. In the case of hunters who own or hunt on property enrolled in the Forest Tax Law section 480a, this is being accomplished through a focus on forest regeneration in the new DEC 480a regulations.

2. There may be a need to motivate hunters to utilize more antlerless tags than they require to satisfy their personal needs for venison. One way to accomplish this would be through an expanded and state-subsidized venison processing network, with the meat distributed to food banks, etc. A preferable alternative would be to legalize the commercial sale of venison. Then the market economy would help solve the problem, rather than the taxpayers.



NYFOA is concerned about the overpopulation of deer throughout New York including within the Adirondack Park, but we recognize that including those areas in the proposed current regulations requires a change in the Environmental Conservation law which is the subject of two bills introduced in the legislature (A.10633/S.9462). We support passage of these bills. Within the Park, private landowners working to maintain a forest resource are thwarted by the population of deer that gravitate to managed properties. Managed properties conduct periodic harvesting that promotes growth of a new emerging forest of trees, preferred browse for deer. There is very little food for deer on preserve land. The result is a skewed population of deer on private land, and a resultant decrease in a beneficial outcome for forest management from harvesting.

The New York Forest Owners Association promotes sustainable forestry practices and improved stewardship on privately owned woodlands in New York State. Through local chapter and statewide activities such as woods walks and tours, the bi-monthly New York Forest Owner magazine, and affiliation with other organizations with similar objectives, we help woodland owners to achieve their management objectives for their properties. Improving the DMP program along with other provisions contained in the proposed regulation changes will improve the ability of hunters to obtain permits, and make the DEC program of deer management more efficient and successful.

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