

# Hunting and Wildlife Conservation Council

September 19, 2023

The Honorable Deb Haaland  
Secretary  
U.S. Department of the Interior  
1849 C Street, N.W.  
Washington, D.C. 20240

The Honorable Tom Vilsack  
Secretary  
U.S. Department of Agriculture  
1400 Independence Avenue, S.W.  
Washington, D.C. 20250

Dear Secretaries Haaland and Vilsack,

The members of the Hunting and Wildlife Conservation Council (Council) are thankful for your leadership and commitment to sportsmen and women as demonstrated through the formation of the Council. Today, we write to you regarding Sunday hunting opportunities within the National Wildlife Refuge System (NWRS) and the National Forest System (NFS).

Specifically, we recommend that the U.S. Fish and Wildlife Service (FWS) and the U.S. Forest Service (USFS) modify Sunday hunting rules for NWRS units, where appropriate and compatible, and NFS lands to be consistent with the laws and regulations of individual states. This includes, but is not limited to, NWRS units and NFS lands in: Alabama, Delaware, Maryland, New Hampshire, North Carolina, Pennsylvania, Rhode Island, South Carolina, and Virginia. We also urge you to leverage the expertise and institutional knowledge of the Council members to identify NWRS units and NFS lands where Sunday hunting can be expanded or opened.

Sunday hunting bans are some of the last remaining examples of puritanical blue laws in existence. In recent years, many of the prohibitions on Sunday hunting have been lessened or repealed by state legislatures and state fish and wildlife agencies, but in many cases, the federal land management agencies have not updated their Sunday hunting regulations accordingly. Today, 40 states have no restrictions on Sunday hunting, and 46 states allow Sunday hunting in some capacity on public lands. In many states where Sunday hunting has been allowed for decades, there are no restrictions prohibiting Sunday hunting on federal public lands including NWRS units and NFS lands, yet the FWS and USFS have not updated their regulations to allow Sunday hunting in many cases.

As you are aware, access, including temporal-access, is a major barrier to entry for hunters. For example, access is often cited as the number one reason why sportsmen and women no longer participate in hunting, and it also impacts prospective hunters who are interested in getting involved with this time-honored tradition but lack sufficient access

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**Douglas Hobbs**  
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opportunities. For example, adult hunters are often limited to weekend hunting because of work schedules, while youth are also limited due to education and extra-curricular activities during weekdays. The creation of new Sunday hunting opportunities will provide an additional weekend day to hunt for workers that hunt among the 23% of the civilian workforce that do not have paid vacation as an employment benefit (*Bureau of Labor Statistics, Economic News Release - Selected paid leave benefits: Access, March 2022*). Finally, providing adults and youth with an additional weekend day afield is critical to recruiting, retaining, and reactivating hunters. Rolling back antiquated Sunday hunting restrictions is, therefore, a top priority of many sporting-conservation organizations, several of which are represented on this Council.

In the case of the NWRS, synthesizing state and federal Sunday hunting regulations is consistent with efforts of the FWS to improve hunting opportunities through the Hunt Fish Rule. Furthermore, hunting is one of the six wildlife-dependent recreational uses of the NWRS as codified through the National Wildlife Refuge Improvement Act of 1997. As for the USFS, hunting is supported on National Forests through the Multiple Use Sustained-Yield Act of 1960 and the Dingell Conservation, Management, and Recreation Act that states “federal land shall be open to hunting” unless there is a specifically closed area. With that in mind, we strongly encourage the FWS and USFS to improve access by increasing Sunday hunting opportunities in accordance with applicable state law.

Furthermore, both the Department of the Interior and Department of Agriculture are signatories to President Biden and Vice President Harris’ “United States Government Interagency Memorandum of Understanding on Promoting *Equitable Access* [emphasis added] to Nature in Nature-Deprived Communities.” As declared by the Memorandum of Understanding, the effort shall focus on “investments in communities who have been locked out of the benefits nature provides to ensure all Americans can benefit from safe parks, natural areas, and waterways where they live, work, and play by expanding access to local parks, tree canopy cover, conservation areas, open space and water-based recreation, public gardens, beaches, and waterways...” which is strongly consistent with the request of the Council to improve Sunday hunting opportunities on federal public lands. Maintaining the religious-based day of rest prohibition against only one user-group, hunters, contravenes the intent of the MOU, and we urge you to correct this access imparity to provide “equitable access” for hunters to effectuate the MOU.

In closing, the Council would like to thank you for your consideration of this important matter. We look forward to working with you, the FWS, and the USFS to increase access for sportsmen and women by improving Sunday hunting opportunities consistent with state law. If you need additional information or have any questions, please contact the Council’s Designated Federal Officer, Doug Hobbs, at [doug\\_hobbs@fws.gov](mailto:doug_hobbs@fws.gov) or on (703) 358-2336.

Sincerely,



Collin O'Mara

Chair

A handwritten signature in blue ink, appearing to be 'John Devney', with a long horizontal line extending to the right.

John Devney  
Vice Chair

Cc: HWCC members  
Matt Strickler, Deputy Assistant Secretary Fish and Wildlife and Parks  
Martha Williams, Director - U.S. Fish & Wildlife Service  
Randy Moore, Chief - U.S. Forest Service  
Cynthia Martinez, Chief - NWRS, U.S. Fish & Wildlife Service  
Robert Harper, Director - Biological and Physical Resources, U.S. Forest Service  
Matthew Huggler, Acting AD - Office of Communications, U.S. Fish & Wildlife Service