



**STATE OF NEW YORK CONSERVATION FUND ADVISORY BOARD**  
**625 Broadway, Albany, NY 12233-4800**

March 6, 2014

Basil Seggos  
Deputy Secretary for the Environment  
NYS State Capitol Building  
Albany, NY 12224

RE: Executive Budget

Dear Mr. Seggos:

The Conservation Fund Advisory Board (CFAB) recently had their monthly meeting and voiced support for the Executive Budget Environmental Package. This package included improved access, hatchery work, crossbow implementation, lowering distance limits for archery and crossbow and a proposal for additional sporting license options and lower fees for those licenses.

After acquiring more information and reviewing the aspects of the proposed 3 year and 5 year licenses and privileges for residents and non-residents the Conservation Fund Advisory Board would like to express its concerns with this part of the Executive Package. In January the licensing system was changed over to e-Licensing. On February 1st a changeover to a new sporting license option and fee structure was implemented. This license and fee structure was approved in the 2013 -2014 budget for implementation in February 2014. The changeover has had problems causing frustration with many issuing agents. DEC and Accela have been working very hard to address the issues agents are having with the e-Licensing system but there are a number of issues that still exist. We have lost numerous issuing agents for a variety of reasons in recent months.

The concerns the CFAB has with the 3 year and 5 year licenses are:

- The reason for the fee and license restructuring last year was to reduce fees and simplify the license structure by lessening the options available. The new proposal creates 24 new license options.
- The new e-Licensing system continues to have issues. Numerous licensing agents have dropped out (roughly 200 out of about 1500). The CFAB is concerned that issues that could arise with the addition of more license options could frustrate existing agents, agents that are listed but are not yet trained on the new system and possible new replacement agents that have expressed an interest in becoming agents. Accessible licensing agents are obviously a huge part of license sales.
- The cost of implementing and administering the 3 and 5 year licenses is yet to be determined. Lowering of fees and the direct impact it has on the Conservation Fund (CF) is always a concern of the CFAB. When the new fees were established in last years budget that went into effect in February 2014 the projections that were done gave the CF about a 5 year "crossover" point. There have been additional staff and more proposed burdens put on the CF that were not part of that projection.
- The new license structure and fees approved in the 2013 -2014 budget have just been implemented there is no data on what the impact of that change will have in sales and revenues. The CFAB feels it is very important to have factual data from this change before implementing new licenses and more reduced fees.

Therefore, it is the advice of the CFAB that although a 3 and 5 year license proposal may have potential merit, this proposal within the Executive Budget be delayed and revisited at a time when the data from the recent license changes is documented and the new e-licensing system has stabilized. We feel this will make for a more solid financial decision and less potential loss of licensing agents both of which are important to the financial success of the Conservation Fund. CFAB would like to emphasize that it is very clear this administration taking numerous steps to enhance the opportunities for the sporting community and those efforts are greatly appreciated.

Sincerely,  


Jason Kemper  
Chairman, NYS Conservation Fund Advisory Board

CC: NYSDEC Commissioner Joe Martens  
Mark Grisanti, Senate Encon Committee  
Robert Sweeney, Assembly Encon Committee