



January 8, 2024

Lisa Vest, Public Hearing Officer
DNREC Office of the Secretary
89 Kings Highway
Dover, DE 19901

Dear Ms. Vest:

Thank you for the opportunity to comment on Delaware's proposed hunting regulations. I am writing to ask that the Delaware Division of Fish and Wildlife consider two archery-related changes during this current regulatory process. The Archery Trade Association's recommendations include reducing Delaware's minimum bow draw weight from 35 lbs. to 30 lbs. and removal of the requirement that all crossbows must have a manufacture date after 1980. Please allow me to elaborate.

As you are likely aware, the Archery Trade Association (ATA) is an organization comprised of manufacturers, retailers, distributors, sales representatives and others working in the archery and bowhunting industry. The ATA has served its members since 1953 and is dedicated to increasing participation in archery and bowhunting. The ATA recently underwent a comprehensive evaluation of bowhunting equipment regulations across the United States. Only two Delaware-centric regulatory issues arose as important to support of our shared goals of reducing regulatory complexity and eliminating barriers for entry.

The ATA believes that bow draw weight minimums are an extremely important regulation metric because unnecessarily restrictive minimums can serve as a barrier to entry. This is especially true for aspiring youthful hunters who may be physically incapable of using overly prescriptive equipment. The majority of states have established bow weight minimums at or below 30-pounds consistent with ATA's position on minimum draw weights which states that "For states desiring to adopt a minimum draw weight standard, ATA recommends that a 30# minimum draw weight be used for typical big game hunting."

Delaware's 35 lb. minimum draw weight regulations are based on decades old technology and have not been updated to reflect technological advancements made over the last several decades. Industry experts have shown that modern-day, 30-pound draw weight compound bows deliver comparable energy to bows that were in use when minimum bow standard regulations were first adopted. Additionally, technological advancements in broadhead/arrow efficiencies contribute greatly to the effectiveness of modern-day archery

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hunters. For these, and a host of other reasons, we recommend reducing Delaware's minimum bow draw weight from 35 lbs. to 30 lbs.

Additionally, Delaware is the only state in the nation which maintains a manufacture date regulatory standard for the allowance of legal crossbow hunting. ATA recommends the removal of the antiquated requirement that all crossbows must have a manufacture date after 1980. This regulation is an unnecessary outlier serving only to add complexity and should be removed.

Archery deer hunting has a long-standing tradition, is a highly valued commodity and strong economic driver for Delaware's hunting and outdoor recreation community. ATA strongly supports the Delaware Division of Fish & Wildlife and believes that archery deer hunting remains one of Delaware's primary gateway opportunities as well as a premier opportunity for the avid deer hunter. As such, we are keenly interested in not only maintaining but growing a strong archery deer hunting constituency. We believe that your immediate attention to these suggested changes are both warranted and important for the continued support of a strong archery hunting constituency in Delaware.

Thank you again for the opportunity to provided comments on these important issues. Let me know if you have any questions or comments.

Regards,

Dan Forster, Vice President & Chief Conservation Officer

cc: Patrick Emory, Director, Delaware Division of Fish & Wildlife

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