

## Public Hearing Comments

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Comments on Docket #2023-R-F-0013 -- Proposed Wildlife Regulations Revisions

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Organization: N/A

### Comments:

Thank you for allowing the opportunity to comment on the proposed regulation changes. My comment is regarding the method of take for turkey hunting. Although I would like to applaud the agency for trying to "promote the technical advancement of shotshells", it is falling a little short on "maintaining human safety considerations". Factory manufactured ammunition options have come a long way over the last decade (where lead shot was the standard) and Tungsten Super Shot "TSS" has become extremely popular within the turkey hunting community. The vast majority of hunters choose this shot option due to its density of 18 g/cc (lead shot is 11 g/cc - 11.3 g/cc) and its nature to pattern tightly. This leads to being able to use TSS five shot sizes smaller than lead shot (if pellet velocity is the same), which produces a significantly more dense pattern, but still maintains the same level of terminal ballistics (pellet energy). An important but much overlooked benefit is that TSS is non-toxic. I am a huge advocate for the regulation changes to allow the use of TSS as it is the most all-around ethical shot option to be used while turkey hunting. However, the current proposed wording would allow TSS sizes that are commonly used for predator hunting and are even used in lieu of buckshot for deer hunting (two ammunition companies load TSS 4 shot and market it as a "predator/hog/deer load"), and that raises a safety concern. The average human sternum is about 10 inches in depth and TSS 4 shot pellets penetrate over 3.7 inches of ballistic gelatin at 73 yards, leaving the muzzle at 1250fps. So, TSS 4 shot can travel about a third of the way through an adult human chest at about 80 yards... I apologize for getting a little dark. The current proposed wording reads as follows: 5.3 Method of Take. 5.3.1 It shall be unlawful for any person to use any firearm to hunt wild turkeys, except a 10, 12, 16, or 20 gauge shotgun loaded with shot no larger than size 4 or a longbow, compound bow or crossbow with a broadhead arrow, 7/8 inches in minimum width. I feel a better wording would be: 5.3 Method of Take. 5.3.1 It shall be unlawful for any person to use any firearm to hunt wild turkeys, except a 10, 12, 16, or 20 gauge shotgun using shot sizes 4 through 6 or mixed loads that include shot sizes 4 through 7. In addition, shotgun gauges 10 through 28, and .410 bore, may be used with shot sizes 7 through 10 in Tungsten Super Shot ("TSS" with a density of 18g/cc) or a longbow, compound bow or crossbow with a broadhead arrow, 7/8 inches in minimum width. It shall be unlawful to use or possess TSS in size 6 or larger. (This last sentence should be bolded) Including the common sub-gauges, 28 gauge and .410 bore, but with the TSS shot and size restriction, would allow older hunters, younger hunters and those sensitive to recoil to be able to ethically hunt and enjoy the Delaware turkey hunting experience. With the advancements that have been made, 28 gauge and .410 bore are more than capable of ethically harvesting turkeys within normal turkey hunting ranges. An average factory load of 3" .410 bore 9 shot TSS is 13/16th of an ounce and contains roughly 294 pellets. Two commonly used 3" 12 gauge factory loads of lead 5 shot are 1 3/4 and 1 7/8th ounce of shot, which contain roughly 297 and 319 pellets respectively. Velocities being the same (which they are) the .410 bore stands right there next the 12 gauge in pellet count,

but will actually outperform the 12 gauge since the smaller pellets retain speed and energy much longer and have a significantly higher sectional density (ratio of mass to cross-sectional area). Load a 28 gauge with TSS and no conventional lead load could even come close to the terminal ballistics in the turkey woods. I strongly feel we, as a state, are missing out on being able to use common sub-gauges, only when loaded with TSS, while turkey hunting as they can easily compete with or flat-out outperform the "typical turkey gauges" when loaded with lead. If the current proposal doesn't include sub-gauges while utilizing TSS, this will be a sadly missed opportunity to allow hunters or would-be hunters that are recoil sensitive to join in on one of the best hunting experiences.