



## NEW YORK BOWHUNTERS, INC.

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The Honorable Commissioner Basil Seggos  
New York State Department of Environmental Conservation  
625 Broadway  
Albany, NY 12233-001

Dear Commissioner Seggos,

I am writing to you today on behalf of our entire statewide membership concerning the recent release of the NYS-DEC Deer Management Proposal. I am going to voice our concerns on several issues with this intrinsically abhorrent proposal which would decimate and delegitimize the storied and long fought for archery seasons in NYS.

Section 2.2.3 would establish a firearms season for antlerless deer in mid-September in WMU's where harvest totals cannot alleviate the burgeoning whitetail deer population. This is reminiscent of another NYS-DEC proposal over a decade ago, when the NYS-DEC wanted to stop the archery season, implement a 2 week muzzle loader season, then restart the archery season again. As anyone who has spent any considerable time bowhunting will tell you, once the firearms start going off, the deer's patterns and daily habits shift.

This would drastically affect the September 27<sup>th</sup> archery opener in the Northern Zone, and the October 1<sup>st</sup> archery opener in the Southern Zone. Since the first archery season in NYS occurred in 1948, it was acknowledged that it is more difficult and more time consuming to kill a deer with archery tackle, hence, an earlier season that precedes the use of firearms. For what purpose other than to disrupt the archery seasons does this serve?

Sections 2.4.1, 2.4.2, 2.4.3, 3.2.1, and 3.2.2 are all essentially linked together regarding expanding whitetail deer populations. NYB has had a successful Urban Deer Management Plan for over 2 decades. It was revised, to be utilized by any of our members where a municipality would benefit from a controlled bowhunt. The NYS-DEC was included within the parameters of the plan, and the finalized version was even sent to the NYS-DEC, in the hopes of fostering a partnership to assist in controlling whitetail deer populations in problem areas.

Unfortunately, for the hunters of NYS, it fell on deaf ears within the confines of the NYS-DEC.

I have also inquired several times for the NYS-DEC to help establish a program that would connect bowhunters with landowners and farmers that have an over abundance of whitetail deer. This would be a win-win for everyone involved. DDP's could be utilized, harvested animals could be donated to food banks or to the Venison Donation Coalition, and the landowner/farmer has reduced impact on the land/crops. See Section 3.1.3. Again, no response from the NYS-DEC.

Sections 3.1.1 and 3.2.3 detail alternate options to control the whitetail deer population. Sterilization, Hysterectomies, sharpshooters, etc...Every one of those options costs money. A controlled bowhunt costs' the state nothing, could generate revenue from an application fee, and is extremely effective. The Towns of Erwin and Irondequoit have made great strides in controlling whitetail deer numbers since they allowed New York Bowhunters, Inc. to implement a controlled bowhunt.

Section 3.1.2 is in regards to DMP's. This has always been baffling to me, as it has been years since I received 2 DMP's for my WMU, 4Y, yet there always seems to be extra DMP's available after you purchase your license. While I understand the concept of a certain number of DMP's per WMU, this is contradictory to wanting to kill more deer. Why not issue 2 to every hunter that applies to make it easier.

Lastly, it seems that the NYS-DEC is seeking full inclusion of the crossbow within the parameters of the archery seasons. The crossbow is not a bow, save for having "bow" in its' name. It is a far cry from the medieval weapon from which it is derived from. Its' technical advances are limitless, as seen with each year's crop of new crossbows. Some are less than 6" when cocked. Some are even limbless, utilizing drums. One does not even have to be cocked by hand, it uses a Co2 canister to pneumatically cock and uncock the crossbow. Each one comes with a scope for long range shooting, even though, according the NBEF (National Bowhunter Education Foundation), the national average bowkill is 15 yards. Yet these crossbows can shoot past 100 yards, out of the box, with little to no practice. One manufacturer of the above mentioned modern marvels is Ravin, and their advertising campaign says "Meet Your Next Rifle."

Citing the NYS-DEC's data of license sales for the 2017-2018 hunting season, and the NYS-DEC crossbow survey, which by the way, neither I, nor any member of NYB, or any hunter that I know of, participated in the survey, I will crunch some numbers. These numbers do not reflect Lifetime License holders, they are purely license sales for the 2017-2018 hunting season.

\*During the 2017-2018 hunting season, 178,749 bowhunting licenses were sold.

\*During the 2017-2018 hunting season 433,525 hunting licenses were sold

\*According to the NYS-DEC crossbow survey, 61% of respondents would buy and hunt with a crossbow if it was legal to use during the entire archery season.

At that rate, there would be a potential increase of 264,450 hunters using a crossbow during the archery season. What is the reasoning behind it, other than to sell more licenses to firearms hunters?

New York Bowhunters, Inc. opposes this Deer Management Proposal as it seeks to tragically alter the archery seasons in the future. If implemented as stated, there would be a disruptive start of the archery season, full inclusion of a superior implement, and an influx of “two-season” hunters, not bowhunters,( who practiced diligently throughout the year and learned BOW safety), but rather rifle hunters who purchased a crossbow and signed a 4 paragraph statement from the syllabus.

New York Bowhunters, Inc. would appreciate the opportunity to discuss this Deer Management Plan that would allow for proper management of the NYS whitetail deer herd, while not compromising the integrity of the archery seasons.

Sincerely yours,

Al Bottari, President  
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