



# NATIONAL DEER ASSOCIATION

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Ty Burns  
Chairman, House Wildlife Committee  
Oklahoma House of Representatives  
2300 N Lincoln Blvd.  
Oklahoma City, OK 73105

6 April, 2023

## **RE: Comments Regarding Senate and House 'Airbow' Legislation (SB 352 / HB 2355)**

Dear Chairman Burns:

On behalf of the National Deer Association (NDA), I am writing to provide our comments in opposition to recent 'airbow' legislation that recently passed out of your committee (HB 2355) and that was introduced to your committee (SB 352). We are a national non-profit conservation organization with the mission to ensure the future of wild deer, wildlife habitat and hunting. We represent thousands of members nationwide, including hunters, landowners and natural resource professionals in Oklahoma.

SB 352 would establish arrow-shooting airguns, or 'air bows', as a legal hunting method for antlerless deer for permanently physically disabled persons during any open season. While the NDA supports innovative efforts to increase hunter recruitment, retention and reactivation (R3), such efforts must adhere to scientific wildlife management principles. In the vast majority of cases, state wildlife agencies are best situated to make decisions regarding expanded choice-of-weapon opportunities, extended seasons and so on. SB 352's inclusion of arrow-shooting airguns into traditional archery seasons ignores ODWC's intentional decision to not include these weapons as legal archery equipment for bowhunting seasons.

Additionally, unlike bows and firearms, airguns (including arrow-shooting airguns) are not included in the items taxed under the Pittman-Robertson Act (which funds the Wildlife Restoration Program) and do not contribute to conservation funding in a manner that is consistent with other authorized methods of take. Last year alone, the ODWC was apportioned over \$27 million from this fund to conduct critical wildlife management activities across the state. While the bill requires a hunter to purchase a special stamp to hunt with an 'air bow', the funds from the stamp will not make up for lost excise tax revenue generated by currently-approved methods of take.

Further, Oklahoma's 117,000 archery hunters accounted for 31% of the state's deer harvest in 2021 – over 9% greater than the next-highest southeastern state – according to the NDA's 2023 Deer Report. Clearly, bowhunting and the current Oklahoma archery season is important to the state's hunters, and the inclusion of arrow-shooting airguns into traditional archery seasons could impact not only the resource but the hunting experience for Oklahoma's plentiful bowhunters.

Please consider joining the NDA in opposing this legislation. In most instances, the NDA supports and prefers choice-of-weapon decisions to be made by state wildlife agencies. Here, we believe the Oklahoma Department of Wildlife Conservation (ODWC) is best qualified to determine legal hunting methods and weapon-specific seasons in the state.

Please don't hesitate to reach out with any questions you may have, or for more information, regarding our position on this or similar legislation.

Sincerely,

A handwritten signature in black ink, appearing to read 'Torin Miller', with a stylized, cursive script.

Torin Miller  
*Senior Director of Policy*