CITIZEN PETITION FORM

DATE: 4 JUNE 2021

Issue:

Handheld bow let-off percentage

Which rule are you seeking to create or revise? Please include a copy of the rule you are proposing to create or change, preferably with the change made in redline format.

We, the Colorado Bowhunters Association, petition to change the maximum allowable let-off percentage for handheld compound bows. We submit that the let-off percentage maximum should be increased from 80% to 85%

Chapter W-2 Big Game

- *Article I*
  - *#203: Manner of Take*

3. Handheld bows, including compound bows, using arrows equipped with a broadhead with an outside diameter or width of at least 7/8ths of an inch with no less than two steel cutting edges. Each cutting edge must be in the same plane throughout the length of the cutting surface.

a. *During the archery seasons for deer, elk, pronghorn, bear, sheep, goat, and moose, only lawful hand-held bows may be used by archery license holders.*
b. *Bows must have a minimum draw weight of 35 pounds. ~~The let-off percentage shall not exceed 80%.~~ The let-off percentage shall not exceed 85%*
c. *No portion of the bow's riser (handle) or any track, trough, channel, arrow rest or other device, excluding the cable(s) and bowstring, that attaches to the bow's riser can contact, support and/or guide the arrow from a point rearward of the bow's brace height.*
d. *Bows can propel only a single arrow at a time and no mechanism for automatically loading arrows is allowed.*
e. *Equipment using scopes, electronic or battery-powered devices cannot be incorporated into or attached to the bow or arrow, with the exception of lighted nocks on arrows and recording devices on bows that cast no light towards the target and do not aid in range finding, sighting, or shooting the bow.*
f. *Hydraulic or pneumatic technology cannot be used to derive or store energy to propel the arrow. Explosive arrows are prohibited.*

Why are you seeking to create or revise this rule? Please include a general statement of the reasons for the requested rule or revision and any relevant information related to the request.

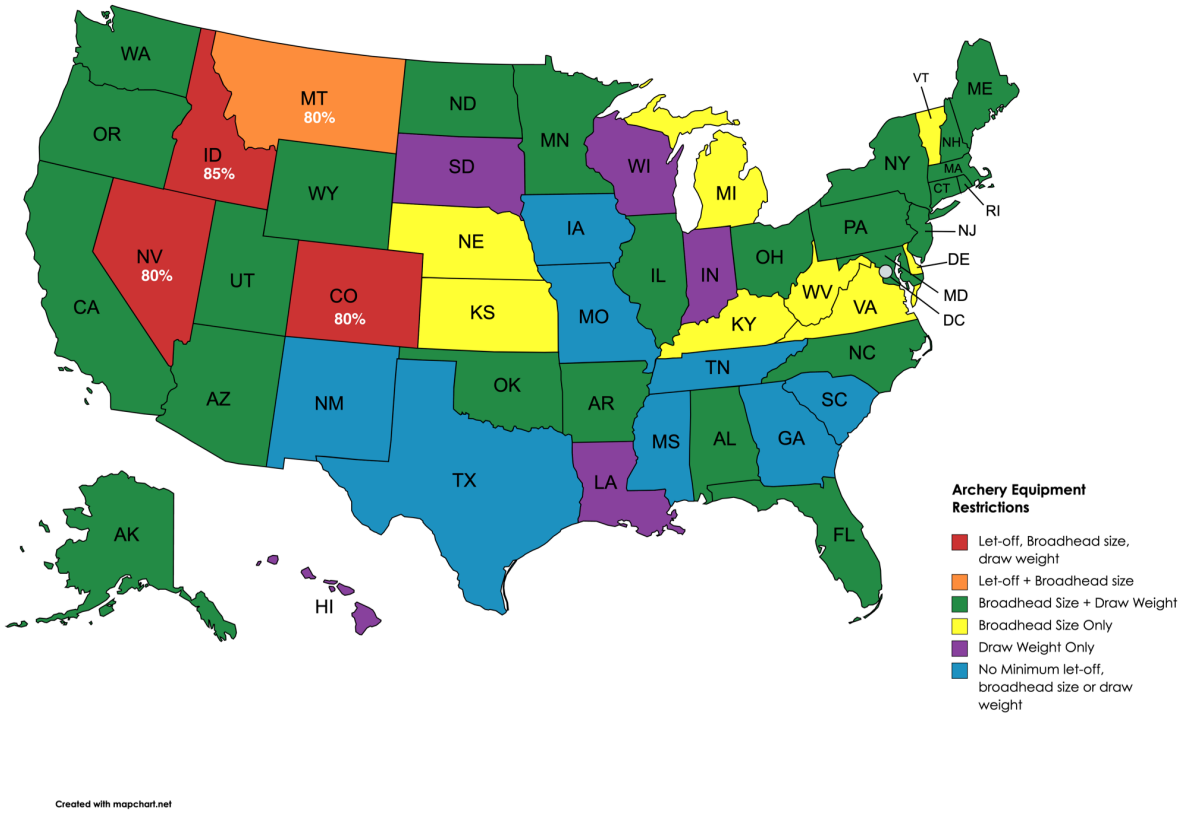
The CBA seeks to revise this regulation for several key reasons:

a. This regulation makes it unnecessarily difficult for out-of-state hunters to stay compliant
b. It puts a strain on small business owners
c. It is outdated

a.Colorado remains one of the last 4 states in the US that specify any sort of let-off percentage maximum. (see image below)

- CO, ID, MT, NV specify a let-off percentage in their archery equipment regulations. The other 46 states in the US do not specify a let-off percentage. Of the four that regulate let-off: CO, MT, NV limit to 80%, ID limits to 85%

The industry standard for the majority of compound bows being manufactured today is 85% let-off. This means that most out-of-state hunters need to purchase new archery equipment or modify their current equipment prior to hunting here. The confusion around this restriction can lead to out-of-state hunters unknowingly breaking compliance if they use a bow purchased in their home state. It can also lead prospective out-of-state hunters to seek hunting opportunities in neighboring states, which limits CPWs license sales.



b.The current manufacturing climate has made our tighter restrictions increasingly difficult for archery equipment dealers and small business owners in our state. Feedback from archery pro shops in Colorado indicates that restricting let-off to 80% leads to lost sales and tighter profit margins.
Several of the most popular bow manufacturers control let-off by using specific modules installed on the bow. These brands typically prioritize what sells nationwide before moving to the smaller market segments when it comes to production timelines. This means that Colorado shop owners are receiving bows weeks or months after shop owners in neighboring states. Colorado shop owners see lost sales as local consumers are then inclined to shop online or out-of-state for new equipment. To stay compliant, hunters then need to purchase the additional module once their local shop receives inventory. (A let-off module costs between $30-50, depending on the brand) When it comes to let-off modules, Colorado shop owners have 2 options:

1. Order bow inventory with non-compliant let-off percentages and purchase an additional module from the manufacturer. As mentioned, these modules cost $30-50 to the shop owner. To maintain competitive pricing, the increased cost is not normally passed down to the consumer. This option negatively impacts profit but provides the highest chance of keeping bow sales local and is what most shops choose.
2. Wait for manufacturers to produce bows with Colorado compliant modules already installed. This reduces inventory cost to the shop owner but opens up significantly more risk that bow purchasers shop online or out-of-state.

c.At the time this regulation was adopted, 80% was the upper limit of the vast majority of bows being manufactured and used nationwide. 80% was also the maximum let-off percentage accepted by The Pope & Young Club. (P&Y is considered to be one of the leading bowhunting authorities in fairchase definitions, equipment standards and conservation) For the last several years, 85% has been the industry standard for compound bows and the Pope & Young Club has since removed any let-off restrictions in their guidelines.

Additional Context / Definitions:

Let-Off for Compound Bows: Let-off is the characteristic of a bow that results in a reduction of the force necessary to increase the draw length after the highest level of draw force has been reached.
Peak Draw Weight: The highest amount of force required to draw a bow.
Holding Weight: The amount of force required to hold a bow at full draw. Holding weight = peak draw weight * (100 - let off percentage)

Examples:

- A bow with a peak draw weight of 35lbs and 80% let-off has a holding weight of 7lbs. (35 * .20 = 7)
- A bow with a peak draw weight of 35lbs and 85% let-off has a holding weight of 5.25lbs. (35 * .15 = 5.25)

Other Notes:
Accurate shot placement is extremely important for ethical bow hunting. One factor of shot efficacy is the ability for an archer to hold a bow steady and on target while the shot is taken. In most scenarios, an archer will be able to hold 5.25lbs or draw weight on target longer than they would 7lbs of draw weight. Thus, many believe a higher let-off percentage allows archery hunters to take more accurate and ethical shots in real life hunting situations. This is especially true for new archers, but it also depends on personal preference and the specifics of the situation. (Target archers sometimes prefer lower let-off percentages as they can choose to stay at full draw for a shorter time period than is usually required in a hunting environment)

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***The following information will not be posted publicly.**

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