

## **Comments on Proposal 81**

By  
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My name is Howard Delo, and I am the person who wrote Proposal #81. I want to correct a wrong statement in the ADF&G Staff Comments on page 267, last sentence.

I would testify in person, but I underwent major surgery in early January and was unable to comply with the written comment deadline. It would not be wise for me to appear in person given the current pandemic situation.

The comment states: “Blackpowder cartridge rifles (BPCR) are different from muzzleloaders (ML) because the blackpowder cartridge rifle loads from the breech and fires a preloaded cartridge that contains black powder. Blackpowder cartridge rifles cannot be legally used in muzzleloader-only seasons and are closer to modern centerfire rifles than muzzleloaders.” The last half of the last sentence is incorrect!

The proposal is asking to include BPCR and ML in the list of approved hunting tool for use during the “targeted permit hunts” in GMUs 14A and 14B. It is not debating the difference between BPCR and ML as to function or similarity to other types of firearms. The basis of my request lies in the ballistics of the BPCR and ML as compared to the already legal 12- and 10-gauge shotguns used in this hunt.

The modern lead shotgun slugs weigh from 420 to around 550 grains and are propelled to a velocity of between 1250 to 1500 feet-per-second (fps). The BPCR calibers which would be most encountered in this hunt use lead bullets weighing from about 405 to around 550 grains and travel at a velocity of around 1250 to 1500 fps. As you can see, the ballistics are virtually identical. If one class of firearms is legal (shotguns), why wouldn't a different class of firearms with identical ballistics be legal also?

I am a certified ADF&G Muzzleloader Hunter Education instructor and in the department supplied information we give folks seeking a muzzleloader hunting certification, it states that, given the same caliber, same barrel length, same bullet weight, and same powder charge, there is no ballistic difference between a BPCR and a ML rifle. One is quicker to load, but then, so is a modern shotgun quicker to reload than a ML.

The only similarity between a BPCR and a modern centerfire rifle is that they both use a cartridge to fire. Black powder is not even close to smokeless powder in power as a propellant. Any attempt to claim a BPCR is “closer” to a modern centerfire rifle is disingenuous and misleading.

My suggestion if this proposal is accepted, is to require the same specifications for ML as currently stated in regulation and to use the outlined BPCR specifications as contained in the Delta Junction bison hunting regulations when hunting this permitted hunt.