Chairman Corey A. Stewart  
James J. McCoart Administration Building  
1 County Complex Court  
Prince William, Virginia 22192  

County Executive Melissa S. Peacor  
James J. McCoart Administration Building  
1 County Complex Court  
Prince William, Virginia 22192  

Dear Mr. Stewart and Ms. Peacor:

On behalf of the Virginia Department of Game and Inland Fisheries, I would like to express appreciation for the recent attention given to deer management issues by Prince William County leaders, but I also wish to express concerns about a current proposal to restrict archery hunting in the county. During a March public meeting called by Supervisor Michael May to discuss the county deer population, the standing room only audience indicated they wanted a county-wide deer reduction program. Their answer mirrors the results of a recent survey by Virginia Tech which showed that more than 12 times as many respondents from Prince William County think the deer population is too large than think it is too small.\(^1\) To effectively and efficiently have a deer population control program in the county it will be necessary to rely heavily on archery equipment to harvest deer from developed areas. The proposed amendments to the weapons ordinance would severely restrict the use of this safe, quiet, and science-based deer management tool.

Regulated hunting is the most practical and cost-effective means to control free-ranging deer populations in most settings. Hunting is also strongly supported by the public (75-80% in recent national surveys). The Virginia Tech survey mentioned above found that 74% of Prince William County residents surveyed supported hunting to reduce deer populations, while 11% opposed it (the rest were neutral). Alternatives to regulated hunting typically are limited in applicability, prohibitively expensive, logistically impractical, or technically infeasible.

\(^1\) White-tailed deer in Virginia, a random survey mailed during winter 2013-14 to residents of 15 counties across Virginia chosen to represent the full spectrum of predicted benefits (e.g., low to high hunting participation) and risks (e.g., agricultural damage, residential plant damage, vehicle collisions) from deer.
Although non-lethal methods may reduce problems at specific sites, lethal population reduction programs are required to resolve community-wide conflicts. For example, fertility control remains largely experimental and appears to be most applicable in closed populations, such as islands or fenced areas, where deer are approachable and unable to disperse naturally. Immunocontraceptives like porcine zona pellucida (PZP) and GonaCon, the first agent approved for use in free-ranging wild deer, have not been approved for general use in Virginia. Surgical sterilization can be effective in small, closed deer populations, but deer capture and surgery makes this option cost-prohibitive for general use.

Annually in Virginia, more than 70,000 archery hunters hunt more than 700,000 collective days. Even with these numbers of participants, archery hunting accidents are extremely rare. Since 1960, there have only been five incidents statewide involving a victim other than the hunter. The last one, an injury to a hunting companion, was in 1996. According to the National Safety Council, hunting is safer than football, baseball, golf, tennis, swimming, and badminton. Archery hunting is compatible with other land uses, including parks and residential areas. No safety incidents have been reported during the urban archery season, which was started in 2002 and now includes 42 cities, towns, and counties throughout the Commonwealth. It is noteworthy that several of the larger, more populous localities participating in this season (e.g., the City of Richmond, Fairfax County) have reported no safety incidents despite having no acreage or distance minimums for discharge of archery equipment. Fairfax County allows archery hunting on private parcels, resulting in over 1500 deer killed each year, and utilizes archery hunting in community parks because of the inherent safety of this method. Last year, 848 deer were safely removed from the parks by the over 800 hunters that participate without the need to close the parks to the public during the hunts.

Why is archery hunting so safe? Hunters utilize tree stands which allow the hunter to engage the target from above. The resulting downward trajectory of the arrow means that the ground acts as a natural backstop. Additionally, archery tackle is only effective at short range, which means that the hunter is close to the target, allowing clear views and easy identification of the target. These two factors combined result in the exceptional safety record archery hunting has amassed. We are concerned that Prince William County residents will have little recourse to address the burgeoning deer population if they are unduly restricted in using archery tackle in the urban parts of the county. Specifically, the acreage requirement to discharge archery equipment for the purpose of hunting is both unnecessary from a safety standpoint and will render a larger portion of the urban landscape off limits to deer management. The perception of a safety risk in the absence of true safety risk does not justify such a weapons ordinance.
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We look forward to continuing our work with Prince William County on deer management and other wildlife issues. Please feel free to contact me at 804-367-9231 or Kevin Rose at 804-937-3193 for more information.

Sincerely,

Robert W. Duncan  
Executive Director

RWD/g

c: Supervisor Wally Covington  
Supervisor Martin E. Nohe  
Supervisor Pete Candland  
Supervisor John D. Jenkins  
Supervisor Michael C. May  
Supervisor Maureen S. Cuddigan  
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