



October 24, 2017

Dear Chairman Wallace & Wildlife Commissioners:

The Nevada Chapter of Backcountry Hunters & Anglers (NV BHA) is grateful for the opportunity to express our questions, concerns and opinions regarding the proposed General Regulations 475 (shed antlers) and 440 (trail cams) to be workshopped at your Commission meeting on 11/3. The workshops are a valuable forum to discuss together, as sportsmen and women, our perceptions of the guiding principles that are cornerstones to the No. American Model of Conservation in the context of these proposed regulations (regs).

For your consideration, below are our views to date:

A) Agenda item 6: # 475: Shed Antlers:

Our NV BHA Board has had lively conversations on this proposed amendment. We are in agreement that we should wait to form our final comments until after the workshop discussion and considering new information.

That said, **we are also in agreement that regulation of shed antler collecting has been sorely needed for some years now.**

Some of the reasons for need we discussed:

1. The degradation of wildlife habitat, particularly at vulnerable wet times of the year, by the many vehicles used in pursuit of sheds is antithetical to the conservation of healthy habitat.
2. Any attendant harassment of wildlife, cutting of fences, off-route motor travel is unacceptable – and illegal.
3. The common sight of trailers laden high with sheds departing our rural communities, usually for the state line, is an affront to the many who consider it an excessive takings of our wildlife resources belonging to all.

Some of the questions/concerns we hope will be discussed:

1. What is the purpose of the proposed regulation? Is hobby collection during winter the real issue? Or is it the profit motive that drives folks out there to collect fresh sheds, creating habitat damage and pressure on wildlife in the process? or both?
2. Once #1 is answered, will this regulation effectively address that objective?

3. If the proposed closure season is the best tool to achieve the objective, are the dates inclusive enough?
4. Should there be a limit on the number of sheds per person that can be collected on any given day, similar to the limits BLM puts on "rock hounders"?
5. Should a permit be required for commercial sales (similar to permit required of rock collection for commercial purposes) and/or collection above a certain number?

B) Agenda Item 7: #440: Trail Cams:

In the view of BHA, **a regulation of trail cams is long overdue.** The consequence of continuing to allow use of such devices for the purposes of scouting and hunting can be harmful to the future of our traditions.

The trail cam issue is of deep concern for BHA, potentially challenging to fair chase principles. Our "sister" western state of Montana had the foresight to enact a prohibition of this technology for hunting/scouting purposes over 15 years ago, long before use became prevalent and considered "acceptable", thus a use more difficult to prohibit.

This technology has only recently evolved to include the real-time video model that can live-stream images to a "smart phone", enabling a hunter to effectively be in more than one place at a time. In our view, **the net effect of "real-time cams" is to substantially reduce the effort, skill and woodsmanship components essential to the hunting experience. In doing so, the advantage of human predator over prey is increased.** This type of trail cam is no different than a "grounded drone". The use of real-time cams is not yet wide-spread. Therefore, this is a prime time to revisit this proposed regulation.

It is clearly evident the 2016 Commission workshop discussions and concerns regarding this proposed reg have been noted by NDOW and produced alterations in the current draft language. While the many exceptions proposed in Section 2 admittedly make this a cumbersome regulation, a rational case can be made for the appropriateness of each.

Our national BHA general position statement on this issue reflects the Boone & Crockett provision:

Trail cameras can be a helpful tool in game management and selective hunting.

The use of devices that transmit captured or live images or video from the field back to the hunter crosses the line of fair chase.

We look forward to learning from the questions, concerns and opinions brought forward in the workshop discussion before we expand the above general position to address the components of this proposed regulation. That said, **we are disposed to strongly support an appropriate regulation of trail cams in keeping with our organizational mission.**

In summation, both proposed regulations (475 & 440) are vital conversations for us to have as they reflect on the fundamental relationships of humans with their environment, as well as the hunter's experience between predator and prey. From the Boone & Crockett "guide book":

The actions of sportsmen, individually and collectively, reflect either positively or negatively on hunting, thereby having effect on the future of our traditions.

NV BHA looks forward to participating in further developing these proposed regulations with NDOW & the Commission, particularly with our organizational mission, concerns and interests in mind.

Thank you for your consideration of these comments, questions and concerns,
Karen Boeger
Board member NV BHA