

June 15, 2016

To: The Nevada Board of Wildlife Commissioners

Re: Proposed regulations 459, 458 (5 (a) & (b)) & 440

Dear Chairman Drew and Commissioners:

The Nevada Chapter of Backcountry Hunters & Anglers (NV BHA) has spoken to you a number of times on the regulation issues you will be discussing and voting upon at your upcoming meeting. We have done so because "fair chase" issues are central to our organization's mission of promoting traditional hunting and fishing for future generations through adherence to the North American Model of Wildlife Conservation.

**Ever-evolving technology holds the potential to** change both the traditional ways we hunt and fish, as well as the non-hunting population's perception of the "sportsmanship" of our traditions. In the following 3 cases, technology has the potential to take the "hunting" out of hunting. The devil is in the details of where we cross a threshold and become merely techno-hunters, leaving behind our woodsmanship skills of scouting, tracking and stalking central to our tradition of both fair chase and respect for the wildlife that belongs to all of us, hunter and non-hunter alike.

For your consideration, our positions are as follows:

**# 459: Drones:**

The Boone & Crockett (B & C) list of conditions rendering trophies ineligible states it simply:

- [Using drones to take pictures or video, or transmitting this information live whether scouting or during a hunt takes unfair advantage over a game animal and other hunters.](#)

Drone restrictions for hunting/scouting purposes has been on our BHA agenda for almost 10 years.

Drone-provided real-time video transmission of wildlife location and movement, reduces need for a hunter's traditional skills of scouting, tracking & stalking, which are key to the self-restraint of fair chase.

We support the regulation as currently written. The language amendments make good sense. It is proactive to address this issue now, early in drone technology development, before use becomes commonplace and "grandfathered" in as an assumed "right". **We urge you to approve this regulation revision.**

**# 458: 5 (a) & (b)**

Because this regulation has separate parts for consideration of revision and/or new restrictions, it is our hope and assumption that you will be discussing and deciding upon each of them as separate entities and vote accordingly.

**(a) Electronic or computer-controlled firing mechanism:**

Like the drones, this technology is in early development. Industry is currently working to make “smart rifles” that are lighter and more affordable than the present design. Now is the time to examine the consequences, intended or unintended, should this technology become widely used for hunting purposes and take appropriate proactive regulatory action “ahead of the curve”. We fully support this regulation to minimize disparate advantages to hunter over prey by this technology.

In our view, this technology takes the human out of the equation, by only firing when the computer decides the tagged “target” is pinpointed. Simply put, it eliminates any human action to pull the trigger, takes away traditional marksmanship skills hunters have had to cultivate, and removes any “uncertainty” from hunting, converting hunters into mere long-distance target shooters.

We support the regulation as currently written. Again, the further we distance ourselves from our traditional skills and woodsmanship, the greater the risk to ability to claim self-restraint, fair chase and respect for our wildlife. **We urge you to approve this portion of the regulation.**

**(b) Caliber & Cartridge Length:**

At the present time, many of our NV BHA Board and members have questions and concerns about the proposed regulation and it's intended purpose. Thus, our views being split, we are not taking a position on this issue.

BHA is committed to preserving fair chase hunting principles. We are concerned with the ever increasing long distance shots to take game and believe the advent of larger calibers and other technological advantages have the potential to erode fair chase principles. However, we are uncertain that the proposed regulation is the best route to address these concerns.

We commend the Commission's efforts toward open discussions of fair chase. Having a degree of subjectivity, it is a difficult topic, although a vital one. **We urge you to continue public conversations on issues pertaining to fair chase principles.** To that end, we are attaching an essay from the Boone & Crockett Club on long range shooting as a proposed point from which to continue the conversation.

For additional consideration: another B & C quote from their trophy regulations, as part of a continuing conversation:

Ⓓ Knowing the range to a target is a critical piece of information for the ethical harvest of big game animals. Rangefinders are a valuable tool, as are riflescopes. However, combining the two into one device, commonly called smart scopes, disqualifies a trophy from being accepted.

**# 440: Trail cameras:**

Boone & Crockett has a clear prohibition of real-time trail cams from trophy consideration. For us, **this is bottom-line:**

**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 are glad that the productive discussions on this topic at the Yerington Commission meeting have been reflected in alterations of the draft language. The revised language concerning protection of wildlife from distraction at water sources appears greatly improved with the addition of appropriate exceptions.

We look forward to learning more from the discussions in the 2nd workshop on this proposal. We will compose our final position statement, after considering additional input, to submit to you when this regulation comes up for a vote.

**In summation:**

Nothing expresses our tenets better than the wisdom from our Boone & Crockett “guide book”:

self-restrained conduct, paying respect for the traditions of hunting, not overwhelming game species by human capabilities. These tenets are intended to enhance the hunter's experience of the relationship between predator and prey, one of the most fundamental relationships of humans and their environment. Further, the actions of sportsmen, individually and collectively, reflect either positively or negatively on hunting, thereby having effect on the future of our traditions.

Thank you for your consideration of our comments,

Brian Sexton  
Chairman, NV Backcountry Hunters & Anglers

# Boone and Crockett club position statement

## Long Range Shooting

First Adopted May 10, 2014

### Situational Overview

Bullets fired from hunting rifles have had the capability of hitting targets at long distances for many decades. Regardless of these capabilities, sportsmen have historically held themselves to an ethical standard of not taking excessively long or risky shots at the big game animals they pursue. New shooting technologies now being developed and promoted for use in hunting are encouraging hunters to shoot at substantially increased distances. These new technologies, while not illegal, are tempting hunters into taking longer and longer shots, which is raising significant ethical questions, including those of fair chase and intent.

The distance at which a shot is considered “long-range,” ethical, or unethical cannot be defined by specific yardages because this varies with each individual situation. It depends on equipment, shooting conditions, the species being hunted, the hunter’s experience and marksmanship skills, and other variables. It also depends on the commitment of every responsible hunter to avoid inflicting undue suffering, to make quick and humane kills, and to make every effort never to waste animals pursued as legal quarry. It is widely acknowledged that the likelihood of wounding, and the challenges of tracking, and recovering animals increase proportionally as shooting distances increase.

Hunting must involve the risk of detection and failure if there is to be any honor in having overcome the superior senses and survival instincts of the hunted. It is for this reason that sportsmen have embraced limitations so that technology does not fully overwhelm the natural capacities of the prey they pursue. This is a self-imposed trade-off that decreases the likelihood of a successful harvest, but heightens the hunting experience and shows respect for the animals being hunted. Combined, these values represent the intent and cherished traditions of hunting.

Position The Boone and Crockett Club believes the term “long-range” shooting is more defined by a hunter’s intent, than any specific distance at which a shot is taken. If the intent of the individual is to test equipment and determine how far one can shoot to hit a live target and if there is no motivation to risk engagement with the animal being hunted, this practice is not hunting and should not be accorded the same status as hunting.

The Boone and Crockett Club maintains that hunting, at its most fundamental level, is defined by a tenuous and unpredictable relationship between predator and prey. This is an intrinsic, irrefutable and intimate connection that cannot be compromised if the hunter is to maintain the sanctity of this relationship and any

credible claim that hunting is challenging, rewarding, respectful of wild creatures, and in service to wildlife conservation. This connection is built upon many complex components that differentiate hunting from simply shooting or killing.

The Club finds that long-range shooting takes unfair advantage of the game animal, effectively eliminates the natural capacity of an animal to use its senses and instincts to detect danger, and demeans the hunter/prey relationship in a way that diminishes the importance and relevance of the animal and the hunt. The Club urges all hunters to think carefully of the consequences of long-range shooting, whether hunting with a rifle, bow, muzzleloader, crossbow, or handgun, and not confuse the purposes and intent of long-range shooting with fair chase hunting.