



NEVADA FIREARMS COALITION

5575 Simmons Street, Suite 1-176
North Las Vegas, Nevada 89031
702-373-5935
www.nvfac.org
www.facebook.com/nvfac
don@nvfac.org
702-373-5935

April 18, 2016

Mr. Jeremy Drew, Chairman
Nevada Wildlife Commission
6980 Sierra Pkwy # 120
Reno, Nevada 89511

RE: Proposed Cartridge Length Restrictions, proposed general regulation 458.

Dear Mr. Drew,

On March 24, 2016, the Board of Wildlife Commissioners (Commission) conducted a "regulation workshop" in Yerington NV regarding Agenda item 20 C "Commission General Regulation 458, Electronic Rifle Triggers, Caliber and Cartridge Length and Smokeless Powder Restrictions." This regulation, as proposed, would make it unlawful to hunt a big game mammal with a rifle using a centerfire cartridge of caliber .46 or larger or an overall cartridge length of 3.8 inches or longer. This letter is our input to the proposed regulation.

The Nevada State Legislature granted the Commission the authority to promulgate regulations: *NRS 501.105 Commission to establish policies and regulations. The Commission shall establish policies and adopt regulations necessary to the preservation, protection, management and restoration of wildlife and its habitat.*

Within this authority there are three primary reasons to enact regulations regarding the "preservation, protection, management and restoration of wildlife and its habitat."

First, a proposed regulation must be based on scientifically documented data that justifies that the new regulation will improve wildlife and or its habitat.

Second, a proposed regulation must be based on scientifically documented data that justifies that the new regulation will prevent a negative effect on wildlife or its habitat.

Third, a proposed regulation must be based on documented facts that justifies that the new regulation protects public health or safety.

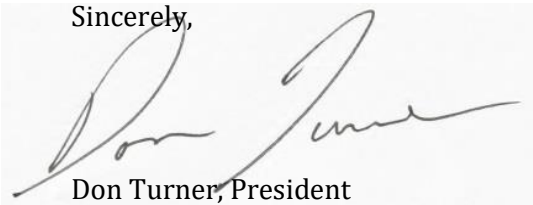
We object to the proposed regulation limiting centerfire cartridges by prohibiting .46 or larger caliber or cartridge length of 3.8 inches or longer. The information presented to justify this regulation does not meet any of the three criteria presented above. The justification does not show

improvement of the harvest of big game mammals. It does not show any documented cases regarding negative issues regarding the harvest of big game mammals, and there was no documentation that it is a factor of public health or safety.

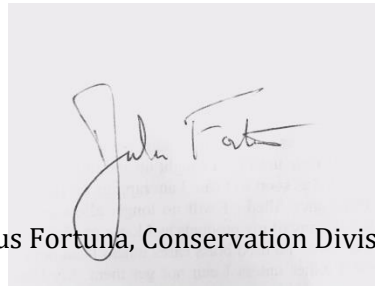
The Department along with the Association of State Wildlife Agencies has been concerned for years and has paid for many studies to determine why the number of hunters is declining, and ways to reverse this trend. As the number of hunting regulations increases each year while the number of hunters is declining, it doesn't take a scientific study to realize that the hunters don't want nor need more rules that discourage participation in the sport. This is especially true of regulations that are not grounded in scientific or documented fact, but upon "perceptions." This makes your rules not enacted for the betterment of wildlife or habitat or for public safety, but upon arbitrary restrictions that are not under the authority granted by the State Legislature. If you could provide documented facts that prove calibers greater than .46 caliber or cartridges longer than 3.8 inches has negatively impacted wildlife populations, or endangered the public safety, we would be more than happy to revisit our position.

However, lacking any documentation, scientific or otherwise that this caliber restriction will have any effect whatsoever on wildlife management or public safety, the Nevada Firearms Coalition opposes this proposed rule and respectfully recommends that this proposed rule be eliminated for lack of scientific studies or documentation.

Sincerely,



Don Turner, President



Julius Fortuna, Conservation Division Director

The Nevada Firearms Coalition is dedicated to the safe use of firearms for self-defense, competition, recreation and hunting. We are the statewide Nevada grassroots organization representing the firearms owners of Nevada. Our membership includes individuals, gun clubs, community organizations, and retail firearm corporations and ranges. We are the State Association for the National Rifle Association, and a member of the National Shooting Sports Foundation, USA Shooting and the Civilian Marksman Program.