



NEVADA FIREARMS COALITION

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Dear Sirs:

The Nevada Firearms Coalition is dedicated to the safe use of firearms for self-defense, competition, recreation and hunting. We are a Nevada grassroots organization representing the firearms owners of Nevada. We are the State Association for the National Rifle Association, and a member of the National Shooting Sports Foundation.

We are requesting that this letter be placed in the official record reflecting our concern regarding the propose projects to be funded by the \$3.00 predator management fee included in the cost of big game tags.

Regardless of the species for which a hunter applies for a big game tag, NRS 250.253 requires that \$3.00, commonly known as a predator management fee, must be charged for processing each application for a game tag. Although seemingly small, it is not an insignificant add-on fee because most hunters apply for multiple tags. When predators are not properly managed, they endanger the establishment of new populations of wildlife, reduce existing species beyond that necessary for a balanced environment, destroy livestock, crops, and property, and endanger human health and safety.

We do not believe that most of the present proposed projects funded by the fee do not fulfill the purposes for which the statute was enacted. Most of the proposed projects appear irrelevant to the management of predators of big game. NRS 250.253 clearly implies that the fee is charged for processing game tags identified in NRS 502.250, which includes tags for deer, antelope, elk, bighorn sheep, mountain goat, and mountain lion.

In the past, the \$3.00 assessments were spent substantially on predator control that benefited mule deer almost to the exclusion of other big game species. Such a program did not give hunters their money's worth and did not necessarily increase populations of other big game. The fact that big game hunters are required to pay this fee for managing predators requires that the proceeds be spent precisely for that purpose.

Five (nos. 21, 29, 30, 33, and 34) of the ten proposed projects concern studies involving the sage grouse. Sage grouse are not big game. Although NRS 502.255(1)(b) allows the fee to be used for "activities relating to the protection of nonpredatory game animals, sensitive wildlife species and related wildlife habitat," the "potential listing of greater sage-grouse" as an endangered species, in the Board of Wildlife Commission's qualifying words, does not justify the Commissioners turning the statute on its head and allocating \$210,000 to sage grouse studies, nearly half of the projected budget total of \$475,000 for predator management.

Two of the proposed projects (nos. 31 and 32) concern diet analysis and diet interaction between cougars and black bears versus mule deer and bighorn sheep. The titles of the projects suggest a foregone conclusion: cougars and black bears eat mule deer and sheep among other animals. No matter what areas may be the focus of the project, another study is not needed to determine that mountain lions and bears eat mule deer and may alternate with other available prey such as livestock and feral horses, and that mule deer and bighorn are opportunistic feeders that eat a variety of vegetable matter according to the habitat and season.

Project no. 25, a "Coyote Ecology Study," is the continuation of an ongoing study of coyote ecology in the Monitor, Toiyabe, and Toquima ranges in central Nevada by a Utah State University masters degree candidate at a cost of \$100,000 per year for three more years. We understand that in the past two years, the student caught and attached radio collars to just five coyotes, of which two have been shot. A quarter of the approximately \$193,000 cost was funded by the \$3.00 fee. Understanding the effects of food availability on coyote abundance, litter size, and home range sizes of coyotes appears to be less of a predation management activity and more of a student's science project.

Only two of the ten proposed projects involve control of carnivores and focus solely on protection of mule deer. Thus, only \$175,000, or 37% of the total budget, was allocated for carnivore control of a single big game species. Although mule deer are the most widely hunted big game species in Nevada, no funds have been earmarked for control of predators of elk, bighorn sheep, and antelope.

Sixty-three percent of the budget is being allocated for studies that are irrelevant for the protection of big game ungulates. Hunters of big game in Nevada are not receiving the benefit of the \$3.00 fee that they pay for each tag. The funds should not be spent on the study of sage grouse or other upland game. Instead, the funds allocated for sage grouse and duplicative or unnecessary studies would be better spent on determining what ungulate herds are not increasing or are declining, the factors responsible, whether reduction of predators will lead to increasing herd size in selected areas, as well as other projects that would be a more worthwhile expenditure of sportsmen's fees.

Sincerely,



Gordon Warren, Director
Conservation Division