



**Testimony to the House Natural Resources Committee  
Subcommittee on Water, Oceans and Wildlife  
In Support of the Prohibit Wildlife Killing Contests Act of 2022 (H.R. 7398)**

**June 30, 2022**

The undersigned organizations thank Chair Huffman and the members of the Water, Oceans and Wildlife subcommittee for conducting a hearing on H.R. 7398, the Prohibit Wildlife Killing Contests Act. This important legislation, sponsored by Representative Steve Cohen, would make it unlawful for any person to organize, sponsor, conduct, or participate in a wildlife killing contest on lands owned and managed by the National Park Service, the U.S. Fish and Wildlife Service, the Bureau of Land Management, the Bureau of Reclamation, or the U.S. Forest Service.

Wildlife killing contests are organized events in which participants kill animals for cash, prizes, or other inducements over a set period of time. Judging categories for wildlife killing contests include, but are not limited to, the number of animals killed, the weight or the sex of animals killed, a tiered point system by species killed, or the smallest or largest body or body part size of animals killed. Wildlife killing contest participants typically pay a registration fee to enter. These fees go toward the prize money, which can amount to thousands—even tens of thousands—of dollars. Other prizes commonly awarded are equipment like weapons, calling devices, spotlights, and night vision devices. Betting is also common.

Across the U.S. every year, thousands of animals fall victim to these events. Coyotes, foxes, and bobcats are the most common targets, but other targeted species include badgers, crows, prairie dogs, rabbits, raccoons, squirrels, and even cougars and wolves.

Wildlife killing contests held on federal lands have included the Predator Hunt Derby in Salmon, Idaho; the 1<sup>st</sup> Annual Sander’s County Great Montana Coyote and Wolf Hunt in Montana; and the Wyoming Coyote Classic, among others.<sup>1</sup> Some contests are advertised in publicly available digital and print media, while others are announced in closed forums. For these reasons, it is difficult to learn of and calculate how many of these contests occur.

Because of increasing public opposition to wildlife killing contests, as well as concerns about their impact on the reputation of hunters, eight U.S. states have prohibited some categories of the contests: Arizona, California, Colorado, Maryland, Massachusetts, New Mexico, Vermont, and Washington.

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<sup>1</sup> Stephen Wells: “The Bloody Business of Coyote Contests.” Huffington Post, Jan. 4, 2018. Available at: [huffpost.com/entry/the-bloody-business-of-co\\_b\\_13952304](https://huffpost.com/entry/the-bloody-business-of-co_b_13952304); [biologicaldiversity.org/news/press\\_releases/2017/wildlife-killing-contests-02-22-2017.php](https://biologicaldiversity.org/news/press_releases/2017/wildlife-killing-contests-02-22-2017.php).

The American public strongly opposes this inhumane, unsporting, and wasteful assault on wildlife. A 2022 poll by Remington Research Group<sup>2</sup> found that the vast majority of Americans who responded are opposed to wildlife killing contests. Notably, significant majorities of Americans across party affiliations hold this view. The survey asked:

Wildlife killing contests are a form of trophy hunting in which participants compete in organized events to kill the most, the largest, or even the smallest animals of a given wildlife species for cash and prizes. The wildlife targeted are not killed for their meat or fur and their bodies are often thrown away after the contest is over. Hundreds of bobcats, foxes, coyotes, raccoons, squirrels, or other animals may be killed and tossed away at a single contest, and hundreds of these events are held every year across the U.S. Do you support or oppose wildlife killing contests?

The survey found that 80% of those who responded oppose wildlife killing contests, 14% support wildlife killing contests, and 6% were not sure. The party affiliation of respondents who oppose wildlife killing contests was 77% Republicans, 87% Democrats, and 72% non-partisan voters.

H.R. 7398 has been carefully crafted to address a specific type of unsporting and destructive event, and therefore the bill contains a number of exceptions. The bill covers all animal species except for fish, shellfish, and crustaceans. Fishing derbies and tournaments, therefore, are unaffected by the legislation. The bill also exempts:

- Competitions in which dogs are judged on their performance of hunting-related tasks under specific rules of nationally or regionally recognized hunting dog associations, known as field trials;
- Killing contests that exclusively target: (1) hoofed mammals (ungulates)—sometimes called big buck contests; or (2) birds of the orders that include turkeys, quails, and peacocks (Galliformes) or ducks, geese and swans (Anatidae); and
- Lethal control actions by State or Federal agencies that target wildlife classified as invasive by the National Invasive Species Information Center.

The primary reasons to ban wildlife killing contests are: (1) contests are cruel and violate fundamental hunting principles taught in hunter education programs as well as the North American Model of Wildlife Conservation, which damages the reputation of sportsmen and sportswomen; (2) contests undermine modern, science-based wildlife management principles and are not an effective wildlife management tool; (3) contests do not prevent conflicts with humans, pets, or livestock—and may increase them; and (4) contests should not take place on taxpayer-funded lands when the vast majority of Americans oppose these competitions.

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<sup>2</sup> [https://www.humanesociety.org/sites/default/files/docs/HSUS\\_Trophy-Hunting-National-Public-Opinion-01-10-22.pdf](https://www.humanesociety.org/sites/default/files/docs/HSUS_Trophy-Hunting-National-Public-Opinion-01-10-22.pdf).

## 1. Wildlife killing contests contravene hunting principles as well as the North American Model of Wildlife Conservation.

Hunters and wildlife management professionals across the country have expressed concerns that wildlife killing contests violate fundamental hunting principles and gravely taint the image of sportsmen and sportswomen and hunting in general. Hunting ethics cover behavior relating to fairness, respect, and responsibility. A manual titled “Today’s Hunter: a guide to hunting responsibly and safely” (“Today’s Hunter”), which is commonly used by state fish and wildlife agencies in hunter education courses required to obtain state hunting licenses, states that “Because ethics generally govern behavior that affects public opinion of hunters, ethical behavior ensures that hunters are welcome and hunting areas stay open.”<sup>3</sup> Hunting ethics promote the concepts of: (1) fair chase rules; (2) ensuring that meat and usable parts are not wasted; (3) treating both game and non-game animals ethically; and (4) respecting non-hunters by transporting animals discreetly, not displaying them.

However, wildlife killings contests are commonly rife with behavior that violates these concepts. In fact, the very nature of these events—where participants are motivated by financial rewards to kill as many animals as allowed over a designated time period—increases the likelihood that participants will fail to abide by established hunting principles.

Regarding fair chase, Today’s Hunter states: “fair chase rules were developed to stem public criticism of hunters . . . the rules were later expanded, banning the use of vehicles, airplanes, and radios; electronic calling; or shooting in a fenced enclosure.”<sup>4</sup> Contest participants frequently disregard this principle, with participants using bait and electronic calling devices to attract animals with sounds that mimic prey or distress calls of wounded young in an attempt to maximize the chances of winning cash and prizes.

Contest participants also frequently violate the principle of “ensuring that meat and usable parts are not wasted.” The animals are not consumed for meat, and the fur is often unusable due to damage from high-powered weaponry. After weigh-in, carcasses are typically discarded.

Contest participants also commonly fail to treat animals ethically. Investigative video footage has shown contest participants joking about the methods used to lure and kill the animals, laughing and posing for photos in front of piles of dead animals, explaining that the guns used would not be used if the fur was intended to be sold, dragging dead animals across the ground, and boasting about the “thrill” of the kill, which represents a failure to “treat both game and non-game animals ethically.”<sup>5</sup> Such behavior demonstrates a lack of respect for wildlife, promotes gratuitous violence, and sends the irresponsible and disturbing message that wanton killing is fun. Furthermore, during wildlife killing contests held in the spring, dependent young

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<sup>3</sup> Today’s Hunter: a guide to hunting responsibly and safely, Kalkomey Enterprises, Inc. (2015) at 66. Available at: <https://dnr.wi.gov/files/pdf/pubs/le/leh104.pdf>.

<sup>4</sup> *Id.* at 35.

<sup>5</sup> The Humane Society of the United States, “Undercover Video Takes Viewers into Grisly World of Wildlife Killing Contests,” May 3, 2018. Available at <https://blog.humanesociety.org/2018/05/undercover-video-takes-viewers-into-grisly-world-of-wildlife-killing-contests.html>; Humane Society of the United States, Undercover: Wildlife Killing Contests, Feb. 10, 2021. Available at <https://www.youtube.com/watch?v=jumXRyrDayE>.

may be orphaned or injured during these events. Killing adult bobcats, coyotes, foxes, and other species inevitably leaves dependent young to die from thirst, starvation, predation, or exposure. Pregnant females are often killed during the prime “killing contest season” of January through March.

Contest participants often flaunt the outcome of their killing spree, in violation of the principle to “[r]espect non-hunters by transporting animals discreetly, not displaying them.” For example, investigative video footage of the Kanawha Valley Predator Calling Championship in Dugspur, Virginia, shows vehicles outfitted with racks displaying multiple dead animals, visible to anyone who passed the vehicles on the road. Bumper stickers and license plates read “Yote H8R,” “Coyote Taxi,” and “Coyote Hearse.” Furthermore, the weigh-in station was located across the street from a restaurant, positioned such that anyone in a passing vehicle could witness participants tossing animals into piles of carcasses, dragging dead animals across the ground, and hanging bloody animals from hooks to be weighed.

These contests also violate the principles set forth in the North American Model of Wildlife Conservation, which is a philosophy and system of policies and laws designed to restore and safeguard fish and wildlife and their habitats through sound science and active management.<sup>6</sup> Tenet four of the Model states that “[w]ildlife shall be taken by legal and ethical means, in the spirit of ‘fair chase,’ and with good cause. Animals can be killed only for legitimate purposes— for food and fur, in self-defense, or for protection of property.”<sup>7</sup> Killing animals in the hopes of winning cash and prizes, and for entertainment, is not one of the legitimate purposes set forth by the Model and taught to hunters in education programs across the country.

Hunters and wildlife management professionals across the United States have expressed concern that such flagrant and common violations of fundamental hunting principles undermine the reputation of sportsmen and sportswomen and damage the tradition of hunting:

- **Tony Wasley, hunter, director of Nevada Department of Wildlife, and president of the Association of Fish & Wildlife Agencies**, stated: “Killing contests are ethically upsetting by virtue for most members of society. Hunting should not be a competition as such behavior ultimately degrades the value of life and undermines respect for the animals being hunted.”<sup>8</sup>
- **The Arizona Game and Fish Commission** stated: “[t]o the extent these contests reflect on the overall hunting community, public outrage with these events has the potential to threaten hunting as a legitimate wildlife management function” and “Wildlife predator/fur-bearing hunting contest[s] that link economic gain to the greatest number or variety of animals killed are contrary to the important principle that the take of wildlife should not be allowed to go to waste or taken for economic

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<sup>6</sup> See, e.g., [North American Model of Wildlife Conservation :: Association of Fish & Wildlife Agencies \(fishwildlife.org\)](https://www.fws.gov/story/2022-04/north-american-model-wildlife-conservation-wildlife-everyone); <https://www.fws.gov/story/2022-04/north-american-model-wildlife-conservation-wildlife-everyone>.

<sup>7</sup> *Id.*

<sup>8</sup> Nevada Department of Wildlife November Wildlife Commission Meeting, Nov. 5, 2021. Available at: [https://www.youtube.com/watch?v=ELXWyYLR\\_f8](https://www.youtube.com/watch?v=ELXWyYLR_f8).

gain.”<sup>9</sup>

- **The Vermont Fish and Wildlife Department** has stated that killing contests “could possibly jeopardize the future of hunting and affect access to private lands for all hunters”<sup>10</sup> and “[t]enet four of the North American Model, ‘wildlife can be killed only for a legitimate purpose,’ is taught in mandatory hunter education courses throughout Vermont. We promote the utilization of, and respect for, coyotes and do not actively support coyote hunting contests that advocate coyotes as vermin. We consider coyotes a sustainable natural resource that can and should be managed as such.”<sup>11</sup>
- **Mike Finley, chair of the Oregon Fish and Wildlife Commission** stated: “[k]illing large numbers of predators as part of an organized contest or competition is inconsistent with sound, science-based wildlife management and antithetical to the concepts of sportsmanship and fair chase.”<sup>12</sup> He also called the contests “slaughter fests” and “stomach-turning examples of wanton waste.”<sup>13</sup>
- **Ted Chu, former wildlife manager with Idaho Fish and Game** stated: “Hunting is not a contest and it should never be a competitive activity about who can kill the most or the biggest animals.”<sup>14</sup>
- **The Massachusetts Division of Fisheries and Wildlife** has also found: “public controversy over this issue has the potential to threaten predator hunting and undermine public support for hunting in general[,]” which prompted a rulemaking to “address public concerns that certain hunting contests are unethical, contribute to the waste of animals, and incentivize [indiscriminate] killing of wildlife, which is inconsistent with the North American Model of Wildlife Conservation.”<sup>15</sup>
- **Dan Gibbs, executive director of the Colorado Department of Natural Resources**, said: “For me, hunting contests don’t sit well. As a sportsman, I’d never

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<sup>9</sup> Arizona Game and Fish Commission, Notice of Proposed Rulemaking, Title 12. Natural Resources Chapter 4. Available at: <https://s3.amazonaws.com/azgfd-portal-wordpress/azgfd.wp/wp-content/uploads/2019/03/25093742/R12-4-303-NPRM.pdf>.

<sup>10</sup> Vermont Fish & Wildlife, Eastern Coyote Issues – A Closer Look (Jan. 2017).

<https://vtfishandwildlife.com/sites/fishandwildlife/files/documents/Hunt/trapping/Eastern-Coyote-Position-Statement.pdf>

<sup>11</sup> Vermont Fish and Wildlife Dep’t, Vermont Coyote Population Report 6 (2018).

<https://vtfishandwildlife.com/sites/fishandwildlife/files/documents/Hunt/trapping/Vermont%20Coyote%20Population%20Report%20to%20Legislature-2018.pdf>.

<sup>12</sup> Testimony by Mike Finley to the Oregon Senate Judiciary Committee, March 18, 2019.

<https://olis.leg.state.or.us/liz/2019R1/Downloads/CommitteeMeetingDocument/200547>

<sup>13</sup> Todd Wilkinson, *A Death of Ethics: is hunting destroying itself?* Mountain Journal, Dec. 12, 2018.

<https://mountainjournal.org/hunting-in-america-faces-an-ethical-reckoning>

<sup>14</sup> Todd Wilkinson, *Shoot biggest wolf, win trophy and cash*, Jackson Hole News & Guide, Dec. 18, 2013.

[https://www.jhnewsandguide.com/opinion/columnists/the\\_new\\_west\\_todd\\_wilkinson/article\\_260cbc66-0bf6-544b-bcf2-b5e9220247bb.html](https://www.jhnewsandguide.com/opinion/columnists/the_new_west_todd_wilkinson/article_260cbc66-0bf6-544b-bcf2-b5e9220247bb.html)

<sup>15</sup> Massachusetts Division of Fisheries and Wildlife, Public Hearing Notice on Draft Division of Fisheries and Wildlife Regulations at 321 CMR 2.00 and 3.02.

[https://www.mass.gov/files/documents/2019/09/20/DFW\\_DRAFT\\_321%20CMR%202.26%2C2.17%2C3.02%20-%20PHN%2C%20Summary%2C%20and%20Proposed%20Regulations.pdf](https://www.mass.gov/files/documents/2019/09/20/DFW_DRAFT_321%20CMR%202.26%2C2.17%2C3.02%20-%20PHN%2C%20Summary%2C%20and%20Proposed%20Regulations.pdf)

participate in one personally . . . wildlife killing contests give sportsmen and sportswomen a bad name and damage our reputation.”<sup>16</sup>

- **Ray Powell, the former New Mexico Commissioner of State Lands**, has said: “The non-specific, indiscriminate killing methods used in this commercial and unrestricted coyote killing contest are not about hunting or sound land management. These contests are about personal profit, animal cruelty...It is time to outlaw this highly destructive activity.”<sup>17</sup>
- **New Mexico State Senator Moores**, who sponsored a bill to ban killing contests, stated: “Killing contests are just blood sports. All they are about is killing as many animals as you can, and not about protecting livestock or property...celebrating mass killing is just not good wildlife management.”<sup>18</sup>
- **Kelly Susewind, director of Washington State Department of Fish and Wildlife**, stated: “[P]art of my job, and frankly part of my soul, is to promote hunting, to get our youth hunting, to really have this be a core piece of what our society supports. And frankly, that job is a lot harder if we’re condoning these types of contests.”<sup>19</sup>
- **Dan Gibbs, hunter and executive director of Colorado Department of Natural Resources**: ‘For me, hunting contests don't sit well. As a sportsman I’d never participate in one personally. Hunting is an important reverent tradition in Colorado and powerful management tool but I also think wildlife killing contests give sportsmen and sportswomen a bad name and damage our reputation.’<sup>20</sup>
- **Virginia Department of Wildlife Resources**: “[There is a] misconception that predator killing contests provide benefits to the public and other wildlife species.”<sup>21</sup> The agency found “no scientific evidence to support claims that predator hunting contests reduce predator numbers, reduce livestock damage, or increase populations of game species (possible exception on heavily hunted individual farms).”<sup>22</sup> It stated “the primary concern of staff is [the] possible negative effects on public views of hunting in general” and that “social media posts contribute to poor public image” because “photos and inappropriate social media posts negatively affect [the] public’s

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<sup>16</sup> Colorado Parks and Wildlife Commission Meeting, Apr. 30, 2020.

[https://www.youtube.com/watch?v=5Vk7x\\_gx5PY](https://www.youtube.com/watch?v=5Vk7x_gx5PY)

<sup>17</sup> Ray Powell, Letter to Mark Chavez, owner of Gunhawk Firearms, Nov. 15, 2012.

<sup>18</sup> Center for Biological Diversity Press Release. [https://www.biologicaldiversity.org/news/press\\_releases/2019/new-mexico-coyote-killing-contest-04-02-2019.php](https://www.biologicaldiversity.org/news/press_releases/2019/new-mexico-coyote-killing-contest-04-02-2019.php)

<sup>19</sup> Washington State Fish and Wildlife Commission Meeting, August 1, 2020. Available at: <https://www.tvw.org/watch/?eventID=2020081003>.

<sup>20</sup> Colorado Parks and Wildlife Commission Meeting, Apr. 30, 2020. [https://www.youtube.com/watch?v=5Vk7x\\_gx5PY](https://www.youtube.com/watch?v=5Vk7x_gx5PY)

<sup>21</sup> Virginia Department of Wildlife Resources, “Predator Hunting Contest Information Presentation,” DWR Board Meeting (May 27, 2021), <https://dwr.virginia.gov/wp-content/uploads/media/05272021-Board-Meeting-Materials.pdf>

<sup>22</sup> *Id.*



view of hunting in general.”<sup>23</sup>

## **2. Wildlife killing contests undermine modern, science-based wildlife management principles and are not an effective wildlife management tool.**

Wildlife killing contests promote indiscriminate killing that is counterproductive to effective wildlife population management. Tenet six of the North American Model of Wildlife Conservation states: “[w]ildlife management, use, and conservation shall be based on sound scientific knowledge and principles.”<sup>24</sup> Scientific studies have shown that coyote populations depleted by unnatural means simply reproduce more quickly due to the sudden drop in competition for resources and changes to social structure from the loss of individuals.<sup>25</sup> The indiscriminate killing of coyotes in particular, which are the most common target of contests, increases their populations over time because it disrupts their social structure, which encourages higher levels of breeding and migration.<sup>26</sup> Unexploited coyote populations are self-regulating based on the availability of food and habitat and territorial defense by resident family groups. Typically, only the dominant pair in a pack of coyotes reproduces, which behaviorally suppresses reproduction among subordinate members of the group. But when one or both members of the alpha pair are killed, other pairs will form and reproduce, lone coyotes move in to find mates, coyotes breed at younger ages, litters are larger, and pup survival has been documented to be higher. These factors work synergistically to increase coyote populations following exploitation events.<sup>27</sup>

Coyotes help to control transmission of diseases like Lyme, keep rodent populations in check, clean up animal carcasses, remove sick animals from the gene pool, disperse seeds, protect ground-nesting birds from smaller carnivores, increase the biological diversity of plant and wildlife communities, and protect crops and gardens.<sup>28</sup>

State wildlife management agencies across the country have recognized that killing contests do

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<sup>23</sup> *Id.*

<sup>24</sup> Today’s Hunter: a guide to hunting responsibly and safely, Kalkomey Enterprises, Inc. at 82 (2015).

<sup>25</sup> F. F. Knowlton, et al., *Coyote Depredation Control: An Interface between Biology and Management*, 52 *Journal of Range Management* 398, 400-402 (1999).

<https://pdfs.semanticscholar.org/43f7/3adf647447dd472db69c0b4712f1c71fab33.pdf>; Robert Crabtree and Jennifer Sheldon, *Coyotes and Canid Coexistence in Yellowstone*, in *Carnivores in Ecosystems: The Yellowstone Experience* (T. Clark et al., eds, 1999); J. M. Goodrich and S. W. Buskirk, *Control of Abundant Native Vertebrates for Conservation of Endangered Species*, 9 *Conservation Biology* (1995); Elizabeth Kierepka, et al., *Effect of Compensatory Immigration on the Genetic Structure of Coyotes*, 81 *J. Wildlife Mgmt* 1394, 1394 (2017). [https://www.srs.fs.usda.gov/pubs/ja/2018/ja\\_2018\\_kilgo\\_002.pdf](https://www.srs.fs.usda.gov/pubs/ja/2018/ja_2018_kilgo_002.pdf).

<sup>26</sup> *Id.*; see also S.D. Gehrt, *Chicago Coyotes part II*, 11 *Wildlife Control Technologies* 20-21, 38-9, 42 (2004).

<sup>27</sup> F.F. Knowlton. 1972. Preliminary interpretations of coyote population mechanics with some management implications. *J. Wildlife Management*. 36:369-382.

<sup>28</sup> S. E. Henke and F. C. Bryant, *Effects of Coyote Removal on the Faunal Community in Western Texas*, 63 *Journal of Wildlife Management* 1066 (1999); K. R. Crooks and M. E. Soule, *Mesopredator Release and Avifaunal Extinctions in a Fragmented System*, 400 *Nature* 563 (1999); E. T. Mezquida, et al., *Sage-Grouse and Indirect Interactions: Potential Implications of Coyote Control on Sage-Grouse Populations*, 108 *Condor* 747 (2006). [http://repository.uwyo.edu/cgi/viewcontent.cgi?article=1003&context=zoology\\_facpub](http://repository.uwyo.edu/cgi/viewcontent.cgi?article=1003&context=zoology_facpub); N. M. Waser et al., *Coyotes, Deer, and Wildflowers: Diverse Evidence Points to a Trophic Cascade*, 101 *Naturwissenschaften* 427 (2014).

not control coyote population size. The North Carolina Wildlife Resources Commission concluded, after reviewing a large body of scientific and peer-reviewed literature, that indiscriminate, lethal methods of controlling coyotes, such as bounties and harvest incentive programs, are ineffective and counterproductive, that coyotes provide benefits to humans and ecosystems, and that non-lethal measures are the best way to address conflicts with coyotes.<sup>29</sup> The North Carolina Commission stated that, “numerous bounty program case studies have led to conclusions that bounties are ineffective in achieving real declines of predators (including coyotes), at addressing livestock depredation, or at positively affecting populations of species targeted for protection.”<sup>30</sup> It further noted that killing predators in bounty programs may have undesirable effects, such as increasing prey species viewed as pests and killing non-offending coyotes, which creates a niche vacancy for coyotes that have learned to prey on livestock.<sup>31</sup> The North Carolina Commission reached the following conclusions:

- a. Intensive removal of coyotes is time-consuming and expensive, and research has yet to show it to be effective.<sup>32</sup>
- b. Coyotes rapidly increase their populations when large numbers of coyotes are removed from an area.<sup>33</sup>
- c. A review of 34 studies that undertook intensive coyote removal found no reduction of coyote numbers over the long term.<sup>34</sup>
- d. Intensive hunting and trapping efforts aimed at lowering coyote numbers either maintained or increased coyote populations.<sup>35</sup>

Wildlife management agencies in states including Massachusetts, Vermont, Florida, Washington, Illinois, Kentucky, Louisiana, Missouri, New Hampshire, Nevada, South Carolina, Tennessee, West Virginia, and Wyoming have reached similar conclusions.<sup>36</sup>

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<sup>29</sup> North Carolina Wildlife Resources Commission, Coyote Management Plan 11, 21-28 (2018).

[https://www.ncwildlife.org/Portals/0/Learning/documents/Species/Coyote%20Management%20Plan\\_FINAL\\_030118.pdf](https://www.ncwildlife.org/Portals/0/Learning/documents/Species/Coyote%20Management%20Plan_FINAL_030118.pdf).

<sup>30</sup> *Id.* at 11-17.

<sup>31</sup> *Id.*

<sup>32</sup> *Id.* at 20.

<sup>33</sup> *Id.*

<sup>34</sup> *Id.*

<sup>35</sup> *Id.*

<sup>36</sup> Massachusetts Division of Fisheries & Wildlife, Public Hearing Notice on Draft Division of Fisheries and Wildlife Regulations at 321 CMR 2.00 and 3.02. (Sept. 20, 2019).

[https://www.mass.gov/files/documents/2019/09/20/DFW\\_DRAFT\\_321%20CMR%202.26%2C2.17%2C3.02%20-%20PHN%2C%20Summary%2C%20and%20Proposed%20Regulations.pdf](https://www.mass.gov/files/documents/2019/09/20/DFW_DRAFT_321%20CMR%202.26%2C2.17%2C3.02%20-%20PHN%2C%20Summary%2C%20and%20Proposed%20Regulations.pdf); Vermont Fish and Wildlife Dep’t, Vermont Coyote Population Report 9 (2018).

<https://vtfishandwildlife.com/sites/fishandwildlife/files/documents/Hunt/trapping/Vermont%20Coyote%20Population%20Report%20to%20Legislature-2018.pdf>; Florida Fish and Wildlife Conservation Commission, Coyotes: Living with Coyotes. <https://myfwc.com/conservation/you-protect/wildlife/coyotes/>; Washington Department of Fish and Wildlife, Coyotes. <https://wdfw.wa.gov/species-habitats/species/canis-latrans#conflict>; Illinois Dept. of Natural Resources, Coyote. <https://www.dnr.illinois.gov/conservation/wildlife/Pages/Coyote.aspx>; Kentucky Dept. of Fish & Wildlife Resources, Coyotes in the Suburbs.

<https://fw.ky.gov/Wildlife/Documents/KASpring17coyotes.pdf>; Travis Dufour, *Living with Coyotes*, Louisiana Dept. of Wildlife & Fisheries Wildlife Division - Private Lands Program.

[http://www.wlf.louisiana.gov/sites/default/files/pdf/publication/34726-living-coyotes-low-res/living\\_with\\_coyotes\\_low-res.pdf](http://www.wlf.louisiana.gov/sites/default/files/pdf/publication/34726-living-coyotes-low-res/living_with_coyotes_low-res.pdf); Bill White, *The Bounty Hunter*, Missouri Dept. of Conservation (Aug. 21, 2012). <https://mdc.mo.gov/blogs/more-quail/bounty-hunter>; New Hampshire Fish and Game, Eastern Coyote. <https://wildlife.state.nh.us/wildlife/profiles/coyote.html>; Nevada Dept. of Wildlife, Coyote.



Additionally, wildlife killing contests do not increase populations of game animals. The best available science indicates that indiscriminately killing native carnivores is not an effective method for increasing game species abundance. Rather, the most important management tool to increase game species is to decrease harvest of female ungulates,<sup>37</sup> followed by protection of habitat.<sup>38</sup> Many state commissions and agencies, including those in New York, Illinois, Louisiana, Missouri, North Carolina, Pennsylvania, South Carolina, Vermont, West Virginia, and Wyoming, have concluded that reducing predator numbers will not enhance populations of ungulates, small game animals, and game birds.<sup>39</sup>

Regarding deer, the best available science demonstrates that killing native carnivores to increase ungulate populations is unlikely to produce positive results because the key to ungulate survival is access to adequate nutrition through habitat protection, not reducing predation.<sup>40</sup>

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<http://www.ndow.org/Species/Furbearer/Coyote/>; National Wildlife Control Training Program, Coyotes. <http://www.dnr.sc.gov/wildlife/publications/nuisance/coyotes.pdf>; Tennessee Wildlife Resources Agency, Controlling Coyotes in Tennessee (Jan. 2003). <https://www.tn.gov/content/dam/tn/twra/documents/coyotecontrol.pdf>; Washington Dept. of Fish and Wildlife, Living with Wildlife. <http://wdfw.wa.gov/living/coyotes.html>; West Virginia Dept. of Natural Resources, Eastern Coyote Impacts Of The Eastern Coyote On Wildlife Populations. <http://www.wvdnr.gov/hunting/CoyoteResearch.shtm>; Dave Rippe, *Predator Control and Wildlife*, Wyoming Game and Fish Dept., Habitat Extension Bulletin: No. 57 (July 1995). <https://wgfd.wyo.gov/WGFD/media/content/PDF/Habitat/Extension%20Bulletins/B57-Predator-Control-and-Wildlife.pdf>.

<sup>37</sup> C.A. DeYoung, *Population dynamics*, in *Biology and Management of Whitetailed Deer* 147 (D. G. Hewitt, ed. 2011); J.C. Kilgo, et al, *Coyote removal, understory cover, and survival of white-tailed deer neonates*, 78 *J. Wildlife Mgmt.* 1261 (2014); North Carolina Wildlife Resources Commission, *Evaluation of Deer Hunting Seasons and Structures and Deer Management Units in North Carolina* (2015). Available at:

<http://www.ncwildlife.org/Portals/0/Regs/Documents/Evaluation-of-Deer-Hunting-Seasons-and-Mgt-Units.pdf>.

<sup>38</sup> C.J. Bishop, et al., *Effect of Enhanced Nutrition on Mule Deer Population Rate of Change*, 172 *Wildlife Monographs* 1 (2009). Available at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=27710&inline=true>; Hurley, M. A., et al., *Demographic Response of Mule Deer to Experimental Reduction of Coyotes and Mountain Lions in Southeastern Idaho*, 178 *Wildlife Monographs* 1 (2011).; T.D. Forrester and H. U. Wittmer, *A review of the population dynamics of mule deer and black-tailed deer *Odocoileus hemionus* in North America*, 43 *Mammal Review* 292 (2013); K.L. Monteith, et al., *Life-history characteristics of mule deer: Effects of nutrition in a variable environment*, 186 *Wildlife Monographs* 1 (2014).

<sup>39</sup> See, e.g., Illinois Dept. of Natural Resources, *Illinois Digest of Hunting and Trapping Regulations: 2018-2019*. Available at: <https://www.dnr.illinois.gov/hunting/documents/hunttrapdigest.pdf>; Travis Dufour, *Living with Coyotes*, Louisiana Dept. of Wildlife & Fisheries Wildlife. Available at:

[http://www.wlf.louisiana.gov/sites/default/files/pdf/publication/34726-living-coyotes-low-res/living\\_with\\_coyotes\\_low-res.pdf](http://www.wlf.louisiana.gov/sites/default/files/pdf/publication/34726-living-coyotes-low-res/living_with_coyotes_low-res.pdf); Missouri Dept. of Conservation, *Coyote*. Available at:

<https://nature.mdc.mo.gov/discover-nature/field-guide/coyote>; West Virginia Dept. of Natural Resources, *Eastern Coyote Impacts Of The Eastern Coyote On Wildlife Populations*. Available at:

<http://www.wvdnr.gov/hunting/CoyoteResearch.shtm>; Dave Rippe, *Predator Control and Wildlife*, Wyoming Game and Fish Dept., Habitat Extension Bulletin: No. 57 (July 1995). Available at:

<https://wgfd.wyo.gov/WGFD/media/content/PDF/Habitat/Extension%20Bulletins/B57-Predator-Control-and-Wildlife.pdf>.

<sup>40</sup> C.J. Bishop, G. C. White, D. J. Freddy, B. E. Watkins, and T. R. Stephenson. 2009. Effect of Enhanced Nutrition on Mule Deer Population Rate of Change. *Wildlife Monographs*:1-28; Hurley, M. A., J. W. Unsworth, P. Zager, M. Hebblewhite, E. O. Garton, D. M. Montgomery, J. R. Skalski, and C. L. Maycock. 2011. Demographic Response of Mule Deer to Experimental Reduction of Coyotes and Mountain Lions in Southeastern Idaho. *Wildlife Monographs*:1-33.; T.D. Forrester, and H. U. Wittmer. 2013. A review of the population dynamics of mule deer and black-tailed deer *Odocoileus hemionus* in North America. *Mammal Review* 43:292-308.; K.L.

Comprehensive studies, including those conducted in Colorado<sup>41</sup> and Idaho,<sup>42</sup> show that killing native carnivores fails to increase deer herds. Recent studies found that removal of native carnivores had no beneficial impact on mule deer populations.<sup>43</sup> The New York State Department of Environmental Conservation found that “random removal of coyotes resulting from a year-round hunting season will not . . . result in an increase in deer densities.”<sup>44</sup> The Pennsylvania Game Commission found: “[T]he agency finally accepted the reality that predator control does not work . . . . To pretend that predator control can return small game hunting to the state is a false prophecy . . . . [Predators] don’t compete with our hunters for game. The limiting factor is habitat – we must focus our efforts on habitat.”<sup>45</sup> The Vermont Fish & Wildlife Department, in addressing wildlife killing contests, similarly stated: “we do not believe such short-term hunts will . . . bolster populations of deer or other game species.”<sup>46</sup> In a 2014 deer harvest report, the South Carolina Department of Natural Resources concluded that trying to control coyotes to manage deer predation was ineffective.<sup>47</sup> North Carolina researchers evaluated deer harvest numbers in South Carolina, North Carolina, Ohio, Florida, New Jersey, and New York and found that coyotes are not limiting deer numbers in those states, and that coyote removal programs do little to increase regional deer numbers.<sup>48</sup> The West Virginia Department of Natural Resources has found: “[p]redator control of coyotes because of wildlife predation is unwarranted and unnecessary.”<sup>49</sup>

Regarding game birds, the North Carolina Wildlife Resources Commission, citing a long list of studies, found that coyotes are beneficial to a wide array of game bird species, including ducks and quail, because they suppress populations of smaller mammals, including feral cats, opossums, raccoons, red foxes, and skunks, and lessen their effects on other species, including birds. The North Carolina Wildlife Resources Commission also found low to no prevalence of wild turkey or other gamebirds in diets.<sup>50</sup> On its website the National Wild Turkey Federation states, “Removing a random predator from the landscape has no impact whatsoever on

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Monteith, V. C. Bleich, T. R. Stephenson, B. M. Pierce, M. M. Conner, J. G. Kie, and R. T. Bowyer. 2014. Life-history characteristics of mule deer: Effects of nutrition in a variable environment. *Wildlife Monographs* 186:1-62.

<sup>41</sup> C.J. Bishop, G. C. White, D. J. Freddy, B. E. Watkins, and T. R. Stephenson. 2009. Effect of Enhanced Nutrition on Mule Deer Population Rate of Change. *Wildlife Monographs*:1-28.

<sup>42</sup> M.A. Hurley, J. W. Unsworth, P. Zager, M. Hebblewhite, E. O. Garton, D. M. Montgomery, J. R. Skalski, and C. L. Maycock. 2011. Demographic Response of Mule Deer to Experimental Reduction of Coyotes and Mountain Lions in Southeastern Idaho. *Wildlife Monographs*:1-33.

<sup>43</sup> T.D. Forrester and H. U. Wittmer. 2013. A review of the population dynamics of mule deer and black-tailed deer *Odocoileus hemionus* in North America. *Mammal Review* 43:292-308.

<sup>44</sup> New York State Dept. of Environmental Conservation, The Status and Impact of Eastern Coyotes in Northern New York (June 1991). <http://www.nysenvirothon.org/Referencesandother/coyotes.pdf>

<sup>45</sup> Jeff Mulhollem, *Pennsylvania Game Commissioners Reply to Unified Sportsmen of Pennsylvania on Predator Questions*, Outdoor News (July 22, 2016). <https://www.outdoornews.com/2016/07/22/pennsylvania-game-commissioners-reply-to-unified-sportsmen-of-pennsylvania-on-predators-questions/>

<sup>46</sup> Vermont Fish & Wildlife, Eastern Coyote Issues – A Closer Look (Jan. 2017). <https://vtfishandwildlife.com/sites/fishandwildlife/files/documents/Hunt/trapping/Eastern-Coyote-Position-Statement.pdf>

<sup>47</sup> Charles Ruth, 2014 South Carolina Deer Harvest Report, South Carolina Dept. of Natural Resources. <http://www.dnr.sc.gov/wildlife/deer/2014DeerHarvest.pdf>

<sup>48</sup> Eugenia V. Bragina et al., *Effects on white-tailed deer following eastern coyote colonization*, 83 J. of Wildlife Mgmt. 916 (2019).

<sup>49</sup> West Virginia Dept. of Natural Resources, Impacts of the Eastern Coyote on Wildlife Populations. <http://wvdnr.gov/hunting/CoyoteResearch.shtm>

<sup>50</sup> North Carolina Wildlife Resources Commission, Coyote Management Plan 16 (2018).

widespread turkey populations,” and goes on to say that instead of worrying about predation, the focus should instead be on improving habitat.<sup>51</sup> An article in *Ducks Unlimited* magazine adds, “Predator control cannot result in meaningful increases in duck numbers or birds in the bag and threatens to undermine the broad coalition of public support on which modern waterfowl conservation depends.”<sup>52</sup> That *Ducks Unlimited* magazine article continues, “The Mississippi Flyway Council (MFC) does not support the practice of predator removal as a viable management practice to improve waterfowl recruitment over the long term or over large geographic areas. The MFC believes that the highest conservation priorities for improving waterfowl recruitment are the landscape-level wetland and grassland habitat restoration strategies advocated by the North American Waterfowl Management Plan (NAWMP).”<sup>53</sup>

### **3. Wildlife killing contests do not prevent conflicts with humans, pets, or livestock—and may even increase them.**

Killing contest proponents have argued, without evidence, that contests are needed to reduce conflicts with livestock. However, such contests are not effective in removing individual, problem-causing animals.<sup>54</sup> Most killing contests target carnivores in woodlands and grasslands where conflicts with humans, livestock, and pets are minimal. Studies have found that killing carnivores fragments social groups and can create ecological voids that may be filled by smaller carnivores with higher population numbers that may prey on livestock.<sup>55</sup>

In a signed statement, more than 70 conservation scientists communicated the following finding about the effect of indiscriminately killing predators on livestock depredation:

Some advocates of wildlife killing contests (WKC) believe they are necessary or beneficial for effective management of livestock depredation. We indicated that WKC are unlikely to have this effect. The reason why is that most individual predators do not participate in livestock depredations. Consequently, effective management of depredation requires (1) targeting the offending individual(s), and (2) intervening close to the site where the depredations occurred as well as responding in a timely manner. WKC do not represent the kind of targeted effort required for effective management of livestock depredations. Moreover, indiscriminate killing of predators is likely to exacerbate risks to livestock. The reason is that killing social carnivores like coyotes (and wolves) can lead to the disruption of predators’ social and foraging ecology in ways that increase the number of transient individuals. These transient individuals that have not been acculturated (aversively conditioned) to living in areas with livestock may

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<sup>51</sup> David Hart: “Coexist with Predators” by the National Wild Turkey Federation at <http://www.nwtf.org/conservation/article/coexist-predators>.

<sup>52</sup> Chuck Petrie: “Prairies Under Siege: Ducks, Habitat Conservation & Predators,” in the November/December 2003 *Ducks Unlimited* magazine. <https://www.ducks.org/conservation/where-ducks-unlimited-works/prairie-pothole-region/prairies-under-siege-ducks-habitat-conservation-predators>

<sup>53</sup> *Id.*

<sup>54</sup> Adrian Treves et al., *Predator Control Should Not Be a Shot In the Dark*, 14 *Front Ecol Environ* 380, 381 (2016). [http://faculty.nelson.wisc.edu/treves/pubs/Treves\\_Krofel\\_McManus.pdf](http://faculty.nelson.wisc.edu/treves/pubs/Treves_Krofel_McManus.pdf)

<sup>55</sup> *Id.*

be more likely to kill livestock.<sup>56</sup>

Additionally, exploited coyote packs are more likely to have increased numbers of pups, and feeding young has been found to be a significant motivation for coyotes to switch from killing small and medium-sized prey to killing sheep.<sup>57</sup>

Furthermore, common arguments about impacts of predator-livestock conflict are exaggerated. According to the U.S. Department of Agriculture (“USDA”), only 0.39 percent of cattle and sheep were lost *to all carnivores combined* (including coyotes, unknown predators, and dogs).<sup>58</sup> The North Carolina Wildlife Resources Commission has noted that, based on USDA data, dogs are an equal or greater risk to sheep, goats, and cattle as compared to coyotes.<sup>59</sup> Disease, illness, birthing problems, and weather constitute the overwhelming cause of livestock mortality.<sup>60</sup>

Prevention—not lethal control—is the best method for minimizing conflicts with coyotes.<sup>61</sup> Eliminating access to easy food sources, such as bird seed and garbage, supervising dogs while outside, and keeping cats indoors reduces conflicts with pets and humans. Practicing good animal husbandry and using strategic nonlethal predator control methods to protect livestock (such as electric fences, guard animals, and removing dead livestock) are more effective than lethal control in addressing coyote-human conflicts.<sup>62</sup> State wildlife agencies, such as the

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<sup>56</sup> Statement in Opposition to Wildlife Killing Contests: Signed By More Than 70 Conservation Scientists. Project Coyote (May 23, 2019). <http://www.projectcoyote.org/wp-content/uploads/2019/05/SAB-Letter-Against-WKCs-2019.05.23-FINAL.pdf>. See also F.F. Knowlton, et al., *Coyote depredation control: An interface between biology and management*, 52 J. Range Mgmt. 398 (1999); J.D.C. Linnell et al., *Large carnivores that kill livestock: do problem individuals really exist?*, 27 Wildlife Society Bulletin 698 (1999); P. Stahl and J.M. Vandel, *Factors influencing lynx depredation on sheep in France: Problem individuals and habitat*, 4 Carnivore Damage Prevention News 6 (2001); K.M. Blejwas et al., *The effectiveness of selective removal of breeding coyotes in reducing sheep predation*, 66 J. Wildlife Mgmt. 451 (2002); A. Treves et al., *Wolf depredation on domestic animals: control and compensation in Wisconsin, 1976-2000*, 30 Wildlife Society Bulletin 231 (2002); A. Treves and L. Naughton-Treves, *Evaluating lethal control in the management of human-wildlife conflict*, in *People and Wildlife, Conflict or Coexistence* 86 (R. Woodroffe et al., eds., 2005); E. Bangs and J.A. Shivik, *Managing wolf conflict with livestock in the northwestern United States*, USDA National Wildlife Research Center-Staff Publications 550 (2001); A. Treves et al., *American black bear nuisance complaints and hunter take*, 21 Ursus 30 (2010); K.A. Peebles et al., *Effects of remedial sport hunting on cougar complaints and livestock depredations*, 8 PLoS ONE e79713 (2013). <https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0079713>; R.B. Wielgus and K. A. Peebles, *Effects of Wolf Mortality on Livestock Depredations*, 9 PLoS ONE e113505 (2014).

<sup>57</sup> F. F. Knowlton, et al., *Coyote Depredation Control: An Interface between Biology and Management*, 52 J. of Range Mgmt. 398, 403 (1999).

<https://pdfs.semanticscholar.org/43f7/3adf647447dd472db69c0b4712f1c71fab33.pdf>; B. R. Mitchell et al., *Coyote Depredation Management: Current Methods and Research Needs*, 32 Wildlife Society Bulletin 1209 (2004).

<sup>58</sup> See U.S. Dept. Agriculture, *Cattle and Calves Death Loss in the United States Due to Predator and Nonpredator Causes*, 2015 (2015). [https://www.aphis.usda.gov/animal\\_health/nahms/general/downloads/cattle\\_calves\\_deathloss\\_2015.pdf](https://www.aphis.usda.gov/animal_health/nahms/general/downloads/cattle_calves_deathloss_2015.pdf); U.S. Dept. Agriculture, *Sheep and Lamb Predator and Nonpredator Death Loss in the United States*, 2015 (2015).

[https://www.aphis.usda.gov/animal\\_health/nahms/sheep/downloads/sheepdeath/SheepDeathLoss2015.pdf](https://www.aphis.usda.gov/animal_health/nahms/sheep/downloads/sheepdeath/SheepDeathLoss2015.pdf)

<sup>59</sup> North Carolina Wildlife Resources Commission, *Coyote Management Plan* 10 (2018).

<sup>60</sup> *Id.*

<sup>61</sup> Fox, C.H. and C.M. Papouchis. 2005. *Coyotes in Our Midst: Coexisting with an Adaptable and Resilient Carnivore*. Animal Protection Institute, Sacramento, California.

<sup>62</sup> Adrian Treves et al., *Forecasting Environmental Hazards and the Application of Risk Maps to Predator Attacks*

Washington Department of Fish and Wildlife, have recognized that “coyotes also benefit ranchers and other property owners by helping control populations of mice, rats, voles, moles, gophers, rabbits, and hares,” which further demonstrates the value of a nonlethal approach.<sup>63</sup>

#### **4. Wildlife killing contests should not take place on taxpayer-funded lands when the vast majority of Americans do not support these competitions.**

Allowing wildlife killing contests on federal lands is an abdication of the U.S. government’s duty to protect the public’s wildlife for the benefit of current and future generations. When it comes to wildlife, Americans—whether they live in urban, suburban or rural areas—do not support practices they view as pointless, unsporting or wasteful.

As discussed earlier in these comments, a January 2022 poll from the Remington Research Group found that 80% of Americans who responded oppose wildlife killing contests, with 77% of Republicans and 87% of Democrats indicating opposition.<sup>64</sup>

A keystone study, the *America’s Wildlife Values* project, has documented a substantial shift in public attitudes away from a traditional view of wildlife—a view of human mastery over wildlife and that wildlife should be managed for human benefit—and toward a mutualist view of wildlife, or the belief that humans and wildlife should coexist and that the welfare of animals is important.<sup>65</sup> The Association of Fish & Wildlife Agencies and the Wildlife Management Institute have noted these studies and underscored the need of state wildlife management agencies to appeal to a broader constituency—not just to those who hold the traditional orientation—to ensure that wildlife agencies remain relevant.<sup>66</sup>

Wildlife killing contest participants often try to vilify coyotes, foxes and other wildlife species targeted in these events in order to justify the contests, but current social science shows that the majority of the public does not share these views about wildlife, including historically

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on Livestock," *BioScience* 61, no. 6 (2011); Philip J. Baker et al., Terrestrial Carnivores and Human Food Production: Impact and Management, *Mammal Review* 38, (2008); A. Treves and K. U. Karanth, Human-Carnivore Conflict and Perspectives on Carnivore Management Worldwide, *Conservation Biology* 17, no. 6 (2003); J. A. Shivik, A. Treves, and P. Callahan, Nonlethal Techniques for Managing Predation: Primary and Secondary Repellents, *Conservation Biology* 17, no. 6 (2003); N. J. Lance et al., Biological, Technical, and Social Aspects of Applying Electrified Fladry for Livestock Protection from Wolves (*Canis Lupus*), *Wildlife Research* 37, no. 8 (2010); Andrea Morehouse and Mark Boyce, From Venison to Beef: Seasonal Changes in Wolf Diet Composition in a Livestock Grazing Environment, *Frontiers in Ecology and the Environment* 9, no. 8 (2011).

<sup>63</sup> Washington Department of Fish and Wildlife, Coyotes. Available at:

<https://wdfw.wa.gov/species-habitats/species/canis-latrans#conflict>.

<sup>64</sup> [https://www.humanesociety.org/sites/default/files/docs/HSUS\\_Trophy-Hunting-National-Public-Opinion-01-10-22.pdf](https://www.humanesociety.org/sites/default/files/docs/HSUS_Trophy-Hunting-National-Public-Opinion-01-10-22.pdf).

<sup>65</sup> Manfredo, M.J., Sullivan, L., Don Carlos, A.A., Dietsch, A.M., Teel, T.L., Bright, A.D., & Bruskotter, J. (2018) *America’s Wildlife Values: The Social Context of Wildlife Management in the U.S.* National report from the research project entitled “America’s Wildlife Values.” Fort Collins, CO: Colorado State University, Department of Human Dimensions of Natural Resources. <https://sites.warnercnr.colostate.edu/wildlifevalues/wp-content/uploads/sites/124/2019/01/AWV-National-Final-Report.pdf>

<sup>66</sup> The Association of Fish & Wildlife Agencies and the Wildlife Management Institute: *The Fish and Wildlife Agency Relevance Roadmap (v1.0); Enhanced Conservation Through Broader Engagement*. September 2019 at [https://www.fishwildlife.org/application/files/2515/7547/9977/Fish\\_Wildlife\\_Relevancy\\_Roadmap\\_Final\\_12-04-19-lowres.pdf](https://www.fishwildlife.org/application/files/2515/7547/9977/Fish_Wildlife_Relevancy_Roadmap_Final_12-04-19-lowres.pdf)



persecuted species. A recent study by researchers at Ohio State University found that between 1978 and 2014, the public's positive attitudes toward coyotes, the most frequent target of killing contests, grew by 47 percent, with the majority of respondents expressing positive attitudes toward coyotes.<sup>67</sup> The researchers theorized that this increase in positive attitudes toward coyotes may indicate that Americans are growing more concerned for their welfare.<sup>68</sup> Other studies, including the *Nature of Americans Report*, have found that Americans express broad interest in nature, believe connecting with nature is important, and want to conserve wildlife species and their habitats.<sup>69</sup>

The high level of consensus about wildlife killing contests underscores that how we value and treat the public's wildlife is a matter of ethics, not a wedge issue between urban and rural residents. Supporting hunting and restricting irresponsible hunting practices are not mutually exclusive. Moreover, wildlife killing contests are a recent invention, not a tradition. The majority of wildlife killing contest organizers have held their first event within the past decade, with a significant increase in events being held within the past five years.

## 5. Additional arguments in favor of banning wildlife killing contests.

### a. HR 7398 will not affect the ability of states to effectively manage wildlife.

This bill is not intended to, and does not, interfere with states' authority to manage wildlife through regulations governing the hunting, trapping, and fishing of wildlife within their borders. Instead, this bill regulates the conduct of private individuals and private organizations on federal land by prohibiting them from providing cash, prizes, and other inducements for the killing of a state-managed resource. Importantly, no state fish and wildlife agency promotes wildlife killing contests as a legitimate management tool. Wildlife killing contests actually undermine effective state management of wildlife because these contests are run by private individuals and private organizations, and state fish and wildlife departments do not monitor how many contests are held, where they are held, what kinds of wildlife are targeted, and how many animals will be killed. Contest organizers frequently compare contests to bounty systems, which is a false equivalency. Bounty systems, which are managed by state fish and wildlife departments, allow the state to set limits on what species are targeted, the number of animals that may be killed, the amount of the award, and the geographic scope.

### b. There is a distinct difference between wildlife killing contests and deer hunting competitions, commonly referred to as "Big Buck" contests.

Deer hunting competitions are typically conducted in accordance with norms and regulations, distinguishing them from the unethical practices common in wildlife killing contests. The

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<sup>67</sup> George, Kelly A., Kristina M. Slagle, Robyn S. Wilson, Steven J. Moeller and Jeremy T. Bruskotter. 2016. Changes in attitudes toward animals in the United States from 1978 to 2014. *Biological Conservation* 201:237-242. <http://www.sciencedirect.com/science/article/pii/S0006320716302774>

<sup>68</sup> *Id.*

<sup>69</sup> Kellert, S.R., Case, D.J., Escher, D., Witter, D.J., Mikels-Carrasco, J., Seng, P.T. April 2017. The Nature of Americans: National Report. [https://natureofamericans.org/sites/default/files/reports/Nature-of-Americans\\_National\\_Report\\_1.3\\_4-26-17.pdf](https://natureofamericans.org/sites/default/files/reports/Nature-of-Americans_National_Report_1.3_4-26-17.pdf)

Wildlife Society, whose mission is “To inspire, empower, and enable wildlife professionals to sustain wildlife populations and habitats through science-based management and conservation,” recently issued a statement on wildlife killing contests that reads in part:

Killing contests differ from typical regulated hunting by the very nature of the organized public competition and prizes being given specifically for killing the largest, smallest, or most animals. ‘Big Buck’ pools or organized record books differ from killing contests because the animals recognized in these competitions are harvested consistent with ordinary and generally accepted hunting practices and then introduced to the competition.<sup>70</sup>

Additionally, deer and other game species are protected by limits on the number of animals that may be killed in a given day or year, limits on times of year when the animals may be hunted, and by strict penalties for poaching.

- c. Wildlife killing contests are not a significant source of income for individuals or funds for nonprofits.

It is highly unlikely that participants engage in contests as a source of income, either from the sale of the animals killed or from the contest prize money. While some competitors may purport to sell the fur of animals killed during the contests, evidence shows that many of the animals are discarded after the event. And because contestants often use high-powered rifles—even AR-15s and similar weapons—that blast holes in the animals’ fur damaging the pelts and rendering them useless for sale. Additionally, competing in these contests is not a reliable source of income. Indeed, most participants likely lose money through entry fees, which often run into the hundreds of dollars. Unless they win, competitors do not recoup their expenses, much less make a profit.

Further, proceeds from the vast majority of killing contests do not benefit nonprofit organizations. Rather, most proceeds are doled out as prizes to the winning competitors. These contests are about killing animals large numbers of animals for thrills and prizes, not fundraising for nonprofits. Organizations have endless fundraising options that do not encourage the cruel, mass killing of native wildlife species for cash and prizes, do not disrupt our ecosystems, and do not damage the reputation of America’s sportsmen and sportswomen.

- d. The bill would not burden law enforcement officials.

H.R. 7398 would not add a significant burden on law enforcement officials for three primary reasons. First, this bill would eliminate the primary incentive for holding contests—cash and prizes—by prohibiting organizers from offering prizes, by barring participants from competing, which reduces the cash pot, and by banning manufacturers from sponsoring events, thus removing the source of donated prizes such as hunting equipment. Without cash and prizes, few are likely to attend the event and, without participants, organizers no longer have an event. The manufacturers of hunting equipment, which traditionally sponsor these contests, may be unlikely

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<sup>70</sup> The Wildlife Society: “Issue Statement: Wildlife Killing Contests,” March 7, 2019.  
[https://wildlife.org/wp-content/uploads/2018/05/TWS\\_IS\\_WildlifeKillingContest\\_ApprovedMarch2019.pdf](https://wildlife.org/wp-content/uploads/2018/05/TWS_IS_WildlifeKillingContest_ApprovedMarch2019.pdf)

to put their businesses on the line by doing so unlawfully. These factors work together to serve as a natural enforcement mechanism that does not rely heavily on law enforcement resources. Second, in order to accumulate a substantial cash pot and valuable items to award as prizes, the organizer must charge a registration fee, pursue corporate or business sponsorships, and advertise the event well in advance. These activities would likely put the event on the radar of law enforcement or individuals who might report the event to law enforcement. Law enforcement would then alert the organizer that they cannot hold the event. As such, most of the enforcement would be in advance of the contest, rather than being an additional burden on conservation officers in the field. In states where bans already exist, current interagency structures and relationships, such as state fish and wildlife departments' communication with sheriff's departments, have proven sufficient to enforce the law and ensure public safety. Third, the bill simply prohibits the offering of cash and prizes to killing contests. Because it has no impact on otherwise lawful hunting, it will not add an additional burden to land management agencies to enforce hunting beyond already existing enforcement.

## 6. Select state bans.

Eight states have enacted bans on wildlife killing contests targeting certain species. These states include Arizona, California, Colorado, Maryland, Massachusetts, New Mexico, Vermont, and Washington. In 2014, the California Fish and Game Commission banned contests targeting game species, furbearers, and nongame mammals. In 2018, the Vermont General Assembly banned coyote-killing contests. In 2019, the New Mexico General Legislature banned coyote-killing contests, the Arizona Fish and Game Commission banned contests for predator and furbearing species, and the Massachusetts Division of Fisheries and Wildlife banned contests for predator and furbearer species. In 2020, the Colorado Parks and Wildlife Commission banned contests for furbearing species and certain small game species and the Washington Fish and Wildlife Commission banned contests for unclassified and classified wildlife species without a bag limit. In 2021, the Maryland legislature passed HB293/SB200, which banned contests to kill coyotes, foxes, or raccoons, with overwhelming bipartisan support. The bill became effective on May 30, 2021. Several additional states, including New Jersey, Oregon, and New York, either have legislation pending, or have had legislation introduced recently, that would ban wildlife killing contests.

The remainder of this testimony identifies the reasons that Arizona, New Mexico, Massachusetts, Vermont, California, and Washington adopted bans on wildlife killing contests.

### a. Arizona

In 2019, the Arizona Game and Fish Commission voted unanimously<sup>71</sup> to adopt a rule banning contests for predator and furbearing species, including muskrats, raccoons, otters, weasels, bobcats, beavers, badgers, ringtail cats, foxes, skunks, coyotes, and bobcats.<sup>72</sup> In its notice of

<sup>71</sup> Available at: <https://www.azgfd.com/game-and-fish-commission-approves-final-rulemaking-prohibiting-organized-predator-killing-contests/>.

<sup>72</sup> Ariz. Admin. Code 12-4-303(A)(4)(i). Available at: <https://casetext.com/regulation/arizona-administrative-code/title-12-natural-resources/chapter-04-game-and-fish-commission/article-3-taking-and-handling-of-wildlife/section-r12-4-303-unlawful-devices-methods-and-ammunition>.

proposed rulemaking,<sup>73</sup> the Commission provided the following rationales for banning killing contests:

- To “regulate hunting activities consistent with the guiding principles governing the Commission’s duty to preserve wildlife for the beneficial use of the public.”
- To “address social concerns associated with predator/fur-bearing contests[.]”
- “Wildlife predator/fur-bearing hunting contest[s] that link economic gain to the greatest number or variety of animals killed are contrary to the important principle that the take of wildlife should not be allowed to go to waste or taken for economic gain.”
- To “strengthen[] consistency with the principles that guide the Commission’s public trust responsibility to conserve wildlife for the benefit of the citizens of Arizona.”
- “To the extent these contests reflect on the overall hunting community, public outrage with these events has the potential to threaten hunting as a legitimate wildlife management function.”
- “The loss of hunting would equate to a measurable loss in conservation efforts, and would represent a failure of the Commission in its duty to preserve wildlife for the beneficial use of present and future generations.”

b. New Mexico

In 2019, the New Mexico General Legislature passed, and the Governor signed, SB 76,<sup>74</sup> which prohibits organizing, sponsoring or participating in coyote killing contests. This bill received bipartisan support and was spearheaded by Senator Mark Moores, a Republican, and Senator Jeff Steinborn, a Democrat. Notably, Senator Moores has a 93 percent rating from the NRA as well as the American Conservative Union. The following statements were made by legislators in support of the bill:

- Senator Moores: “Killing contests are just blood sports. All they are about is killing as many animals as you can, and not about protecting livestock or property. No one is trying to restrict landowners’ ability to kill offending coyotes, but celebrating mass killing is just not good wildlife management.”<sup>75</sup>

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<sup>73</sup> Notice of Proposed Rulemaking, Arizona Game and Fish Dep’t (2019). Available at: <https://s3.amazonaws.com/azgfd-portal-wordpress/azgfd.wp/wp-content/uploads/2019/03/25093742/R12-4-303-NPRM.pdf>.

<sup>74</sup> New Mexico General Legislature, Senate Bill 76. Available at: <https://www.nmlegis.gov/Sessions/19%20Regular/final/SB0076.pdf>.

<sup>75</sup> Center for Biological Diversity Press Release. Available at: [https://www.biologicaldiversity.org/news/press\\_releases/2019/new-mexico-coyote-killing-contest-04-02-2019.php](https://www.biologicaldiversity.org/news/press_releases/2019/new-mexico-coyote-killing-contest-04-02-2019.php).

- Senator Steinborn: “With the signing of this bill, New Mexico is sending a powerful message that we value our wildlife and humane treatment of them.”<sup>76</sup>
- Representative Matthew McQueen: “They are seen by the public as gruesome and abhorrent because they are gruesome and abhorrent[.]”<sup>77</sup>

Prior to the enactment of the SB 76, the New Mexico State Land Commissioner, Stephanie Garcia, issued an executive order banning killing contests for unprotected species on 9 million acres of New Mexico state trust land on January 10, 2019.<sup>78</sup> Commissioner Garcia made the following statements:

- Coyote killing contests are “not hunting contests, they are animal cruelty contests. It is an inexcusable practice . . . all wildlife are sacred and all wildlife play a vital role in our environment. What we are addressing is the blood sport where participants kill dozens of animals without sound justification and play for cash and prizes.”<sup>79</sup>
- “This action does not restrict a rancher’s ability to humanely remove or kill an animal causing harm to agriculture or domestic pets on State Trust Lands.”<sup>80</sup>
- “This executive order is not to say the New Mexico State Land Office doesn’t support hunters, hunters who hunt ethically, hunters who use practices that follow the law and include fair chase, hunters that use what they kill[.]”<sup>81</sup>

### c. Massachusetts

In 2019, the Massachusetts Division of Fisheries and Wildlife adopted a rule that prohibits contests for predator or furbearing animals, including bobcat, gray fox, red fox, coyotes, opossum, raccoon, weasel, fisher, mink, river otter, muskrat, beaver, and skunk.<sup>82</sup> The Board also approved a corresponding provision on wanton waste.<sup>83</sup> In its summary of proposed draft regulations,<sup>84</sup> the Division provided the following rationales for banning killing contests:

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<sup>76</sup> Center for Biological Diversity Press Release. Available at:

[https://www.biologicaldiversity.org/news/press\\_releases/2019/new-mexico-coyote-killing-contest-04-02-2019.php](https://www.biologicaldiversity.org/news/press_releases/2019/new-mexico-coyote-killing-contest-04-02-2019.php).

<sup>77</sup> Robert Nott, Coyote-killing Contest Ban Now up to Governor, Santa Fe New Mexican (Mar. 13, 2019). Available at: [https://www.santafenewmexican.com/news/legislature/coyote-killing-contest-ban-now-up-to-governor/article\\_d5e596c1-7bd3-502c-ae1a-174d04d5c152.html](https://www.santafenewmexican.com/news/legislature/coyote-killing-contest-ban-now-up-to-governor/article_d5e596c1-7bd3-502c-ae1a-174d04d5c152.html).

<sup>78</sup> Fiscal Impact Report, SB 76, at 2. Available at: <https://nmlegis.gov/Sessions/19%20Regular/firs/SB0076.PDF>.

<sup>79</sup> *Id.*; see also Garcia Signs Executive Order Banning Killing Contests on State Trust Land (Jan. 10, 2019).

Available at: [https://www.nmstatelands.org/wp-content/uploads/2019/06/1.10.19\\_KillingContest\\_EO\\_1.pdf](https://www.nmstatelands.org/wp-content/uploads/2019/06/1.10.19_KillingContest_EO_1.pdf).

<sup>80</sup> *Id.*

<sup>81</sup> Susan Montoya Bryan, Coyote Killing Contests Now Banned on State Trust Land, Las Cruces Sun News (Jan. 12, 2019). Available at: <https://www.lcsun-news.com/story/news/local/2019/01/12/nm-law-coyote-killing-contest-banned-state-land-commission-animal-hunting/2552685002/>.

<sup>82</sup> 321 CMR § 2.16 and 2.17. These regulations will go into effect once the amendments go through the promulgation process, which will likely conclude in February or March 2020.

<sup>83</sup> 321 CMR § 2.17.

<sup>84</sup> Massachusetts Division of Fisheries and Wildlife, Public Hearing Notice on Draft Division of Fisheries and Wildlife Regulations at 321 CMR 2.00 and 3.02. Available at:

[https://www.mass.gov/files/documents/2019/09/20/DFW\\_DRAFT\\_321%20CMR%202.26%2C2.17%2C3.02%20-%20PHN%2C%20Summary%2C%20and%20Proposed%20Regulations.pdf](https://www.mass.gov/files/documents/2019/09/20/DFW_DRAFT_321%20CMR%202.26%2C2.17%2C3.02%20-%20PHN%2C%20Summary%2C%20and%20Proposed%20Regulations.pdf).



- To “address public concerns that certain hunting contests are unethical, contribute to the waste of animals, and incentivize indiscriminant killing of wildlife, which is inconsistent with the North American Model of Wildlife Conservation.”
- “Recognizing that ensuring ethical hunting practices promotes and sustains support for hunting by the general public, the draft regulations fulfill one of MassWildlife’s core functions and its statutory responsibility to develop and maintain hunting, fishing, and trapping opportunities in Massachusetts.”
- “Without reducing the opportunity for hunting coyotes or furbearers, the proposed regulatory changes discourage the waste of wildlife and reinforce a core principle and expectation that all animals taken during the regulated seasons are utilized to the greatest extent possible, as taught by MassWildlife’s Hunter Education Program.”
- “To accomplish the mutually dependent responsibilities of conserving wildlife and promoting hunting, MassWildlife seeks to regulate hunting in a manner that not only minimizes the waste of the Commonwealth’s wildlife resources but also mandates ethical hunting practices that, in turn, promote or sustain support for hunting by the general public.”
- “The current harvest from coyote hunting does not reduce the coyote population, nor would hunting have an appreciable impact on coyote population size under any realistic scenarios. Furthermore, despite the presence of coyotes, the deer population and harvests are at historical highs and deer populations are thriving in Massachusetts. Consistent with these deer population numbers, recent research shows that coyote predation on fawns and adult deer does not impact deer populations.”

d. Vermont

In 2018, the Vermont General Assembly passed, and the Governor signed, Act No. 170 (H.636),<sup>85</sup> which prohibited coyote killing contests. To develop this legislation, the legislature requested that the Vermont Department of Fish and Wildlife conduct research on coyote management in the state. The Department’s report<sup>86</sup> stated the following:

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<sup>85</sup> Vermont General Assembly, Act No. 170 (H.636). Available at: <https://legislature.vermont.gov/Documents/2018/Docs/ACTS/ACT170/ACT170%20As%20Enacted.pdf> (relevant text appears on page 14 of the pdf).

<sup>86</sup> Vermont Fish and Wildlife Dep’t, Vermont Coyote Population Report (2018). Available at: <https://vtfishandwildlife.com/sites/fishandwildlife/files/documents/Hunt/trapping/Vermont%20Coyote%20Population%20Report%20to%20Legislature-2018.pdf>.

- “[T]hese kinds of competitive coyote hunts are raising ethical objections on the part of some members of the public and could possibly jeopardize the future of hunting and/or affect access to private lands.”<sup>87</sup>
- “We do not endorse any of these types of programs [contests and bounty programs] because we do not believe they have any long-term beneficial effect on the population nor do they foster the respect deserved by any harvested animal.”<sup>88</sup>
- “Tenet four of the North American Model, ‘wildlife can be killed only for a legitimate purpose’, is taught in mandatory hunter education courses throughout Vermont. We promote the utilization of, and respect for, coyotes and do not actively support coyote hunting contests that advocate coyotes as vermin. We consider coyotes a sustainable natural resource that can and should be managed as such.”<sup>89</sup>
- “Polarization of the hunting and non-hunting communities, especially those that care about the future of wildlife and their habitats, is one of the greatest threats to the future of wildlife conservation.”<sup>90</sup>
- “It is critical . . . that [hunters] too, show respect for others, for landowners, and for the wildlife that they harvest and recognize and respect the fact that wildlife have an intrinsic value that is critically important to many members of the public.”<sup>91</sup>
- “Unlike its counterparts in some states, Vermont’s Fish and Wildlife Department does not sponsor or promote or encourage coyote hunting tournaments and we do not believe that such short-term hunts will have any measurable impact on prey such as deer.”<sup>92</sup>
- “When coyote populations are exploited, productivity and pup survival increases. Because of these behavioral and biological responses of coyotes to exploitation, coyote populations rebound quickly from any effort to control their numbers rendering such efforts ineffective. Given the characteristics of coyote life history cited above, there is little likelihood that any longterm reduction of Vermont’s statewide coyote population is achievable via competitive coyote hunting contests.”<sup>93</sup>
- “In fragmented landscapes, coyote presence has been shown to have a beneficial effect on bird and small mammal species diversity because they have a negative impact on

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<sup>87</sup> *Id.* at 9.

<sup>88</sup> *Id.* at 14.

<sup>89</sup> *Id.* at 6.

<sup>90</sup> *Id.* at 13.

<sup>91</sup> *Id.* at 14.

<sup>92</sup> *Id.* at 8.

<sup>93</sup> *Id.* at 9.

domestic cats, raccoons, and opossum, all of which are significant predators of song birds.”<sup>94</sup>

- “[T]here are numerous scientific studies that suggest coyotes do not regulate deer populations.”<sup>95</sup>

e. California

In 2014, the California Fish and Game Commission banned contests targeting furbearers and nongame mammals.<sup>96</sup> Furbearers include fisher, marten, river otter, desert kit fox, red fox, badger, gray fox, muskrat, mink, beaver, and raccoon.<sup>97</sup> Nongame mammals include coyotes, weasels, skunks, opossum, moles, and rodents.<sup>98</sup> In its initial statement of reasons for regulatory action,<sup>99</sup> the Commission provided the following rationales for banning killing contests:

- “Extensive public controversy exists about prizes for nongame hunting contests, specifically furbearers and nongame mammals.”<sup>100</sup>
- “Deliberation by the public makes it clear that defining sportsmanlike conduct is an important outcome of this regulation. The introduction of prizes changes hunting behavior by inducing competition beyond that which would normally occur.”<sup>101</sup>
- “The Commission believes that offering inducements for hunting contests of animals with no regulated take does not reflect good sportsmanship[.]”<sup>102</sup>
- “The Commission views . . . permitting inducements for the unlimited take of furbearers and nongame mammals as unsportsmanlike.”<sup>103</sup>

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<sup>94</sup> *Id.* at 4.

<sup>95</sup> *Id.* at 3.

<sup>96</sup> 14 CCR § 465 (ban for furbearers). Available at: [https://casetext.com/regulation/california-code-of-regulations/title-14-natural-resources/division-1-fish-and-game-commission-department-of-fish-and-game/subdivision-2-game-furbearers-nongame-and-depredators/chapter-5-furbearing-mammals/section-465-general-provisions-for-taking-furbearers?PHONE\\_NUMBER\\_GROUP=P&sort=relevance&type=case&resultsNav=false&tab=keyword](https://casetext.com/regulation/california-code-of-regulations/title-14-natural-resources/division-1-fish-and-game-commission-department-of-fish-and-game/subdivision-2-game-furbearers-nongame-and-depredators/chapter-5-furbearing-mammals/section-465-general-provisions-for-taking-furbearers?PHONE_NUMBER_GROUP=P&sort=relevance&type=case&resultsNav=false&tab=keyword). 14 CCR § 472(e) (ban for nongame mammals). Available at: <https://casetext.com/regulation/california-code-of-regulations/title-14-natural-resources/division-1-fish-and-game-commission-department-of-fish-and-game/subdivision-2-game-furbearers-nongame-and-depredators/chapter-6-nongame-animals/section-472-general-provisions>. Contests for game species have also been banned. Fish and Game Code § 2003 (ban for game species). Available at: <https://codes.findlaw.com/ca/fish-and-game-code/fgc-sect-2003.html>;

<sup>97</sup> 14 CCR § 460-464. Available at: <https://fgc.ca.gov/Regulations/Current/Mammals#460>.

<sup>98</sup> 14 CCR § 472(a). Available at: <https://fgc.ca.gov/Regulations/Current/Mammals#472>.

<sup>99</sup> California Fish and Game Commission, Initial Statement of Reasons for Regulatory Action, Amend Sections 465 and 472 (July 9, 2014). Available at: [http://www.projectcoyote.org/wp-content/uploads/2020/02/CA\\_FinalFGCommissionRule\\_KillingContests12.14.pdf](http://www.projectcoyote.org/wp-content/uploads/2020/02/CA_FinalFGCommissionRule_KillingContests12.14.pdf).

<sup>100</sup> *Id.* at 1.

<sup>101</sup> *Id.* at 2.

<sup>102</sup> *Id.* at 2.

<sup>103</sup> *Id.* at 2.

f. Washington

On February 8, 2020, the Washington Fish and Wildlife Commission voted to initiate a preproposal statement of inquiry into possible rulemaking to ban or otherwise limit wildlife killing contests in the state. A final rule went into effect banning contests for unclassified and classified wildlife species without a bag limit in October 2020, citing the fact that the contests “promote killing large numbers of those species that do not have a bag limit which can be perceived negatively by some members of the public.”<sup>104</sup> Below are statements made by Commissioners during the February 8, 2020 hearing on this subject:<sup>105</sup>

- Commissioner Thorburn: “We believe we need to move forward with this and there need to be modifications. Basically, the discussion centered around the coyote derby, where it’s kill as many as you can and you get a monetary prize for just killing lots of animals. That in no way represents the ethics of hunting and the hunting community that the Department promotes. That’s why we think it’s important to go forward in banning these contests and looking at the species that should be included, even beyond coyotes.”
- Commissioner Linville: “We have agricultural fields on either side of the road and the coyotes are often out there eating gophers, moles, etc. and so they’re very exposed. When these contests—sanctioned or otherwise—happen, how we know they’re going on is we have pick-up trucks racing up and down the road, people jumping out, shooting from the road . . . . Then they run out in our fields to get the carcass and drag it off—essentially trespassing—which, when you trespass when you’re hunting, that’s poaching . . . . We also have livestock guardian dogs, and we start getting really worried about their safety during these contests, and they’re the reason that we can have predators on the ranch because they keep the balance, and so they’re very important to operation. The breeder where we get our dogs from have had dogs killed during killing contests, and she has a three-legged dog because its leg got shot off during one of these killing contests.”
- Commissioner Linville: “In my community, you may get pushback for banning these killing contests, not because some folks are in favor of them. But some folks are concerned that it’s a slippery slope to taking away coyote hunting. Then what we heard from our testimony today is that you should ban them so that there isn’t a slippery slope toward removing ethical hunting even on predators . . . . [A]ppropriate ethical coyote hunting is not what we’re talking about here.”
- Commissioner Anderson: “As a hunter, and having a lot of friends and acquaintances who are hunters, the distinction between these killing contests and regular hunting definitively needs to be brought out. I think it has been brought out and we need to keep

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<sup>104</sup> Washington Dept. of Fish and Wildlife (Sept. 21, 2020). Available at: [wsr\\_20-19-115.pdf \(wa.gov\)](#).

<sup>105</sup> Video of Washington Fish and Wildlife Commission Hearing on February 8, 2020. Discussion of contests begins at 22:50 and ends at 1:38:35. Video available at: <https://www.tvw.org/watch/?clientID=9375922947&eventID=2020021021>. A transcript is on file with author and available upon request.

this distinction out there so there isn't the adverse reaction, when there could be a well understanding and common ground.”

- Commissioner Smith: “I’m one of the traditional constituents. I’m a hunter and fisherman. I think ethics has crept in over the years, rightfully so . . . . the two words, “hunting contest” just goes against my nature as a hunter and an environmental scientist . . . . Hunting provides that experience, but that’s in no way a contest, it’s an experience. As a traditional client of agencies like this, and even as an environmental scientist, I could never support having hunting contests.”
- Commissioner Baker: “our statutory mandate is to perpetuate, preserve, and protect . . . . It says, ‘Sound stewardship of fish and wildlife.’ We also work under ethical principles, which are our governing principles, and are ripe with ethics. The way I’ve read them, they don’t support making a game out of killing as many animals as you can.”

## CONCLUSION

A ban on wildlife killing contests is a narrowly tailored, commonsense measure backed by science. It would not affect in any way the lawful, regulated hunting of coyotes and other wildlife species on public lands, and would only bring an end to a frivolous practice that makes a “cash and prizes” game of killing vast numbers of animals.

For the reasons stated above, the undersigned organizations support H.R. 7398 to prohibit wildlife killing contests on America’s taxpayer-funded lands, and urge swift passage through the House Natural Resources Committee.

Thank you for your consideration of this vitally important wildlife and conservation issue.

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