



Animal Welfare Institute

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Via Email: Rules.Coordinator@dfw.wa.gov

Washington Department of Fish and Wildlife
Wildlife Program
PO Box 43200
Olympia, WA 98504

Re: Comments in Support of Proposal to Amend WAC 220-412-110 and WAC 220-413-060

Dear Washington Department of Fish and Wildlife Rules Coordinator:

The Animal Welfare Institute, on behalf of over 1,300 members in Washington, submits these comments in support of the rule proposed by the Washington Department of Fish and Wildlife (“WDFW”) to amend WAC 220-412-110 and WAC 220-413-060 to restrict hunting contests. AWI is a nonprofit charitable organization founded in 1951 that is dedicated to reducing animal suffering caused by people. AWI engages policymakers, scientists, industry, and the public to achieve better treatment of animals everywhere—in the laboratory, on the farm, in commerce, at home, and in the wild.

The proposed rule would prohibit contests involving unclassified and classified wildlife species without a bag limit, including coyotes, bobcats, foxes, crows, and raccoons, by amending WAC 220-412-110.¹ The proposed rule would also amend WAC 220-413-060 to make it unlawful to participate in a contest for which no permit has been issued, with violations punishable as an infraction.² Wildlife killing contests are organized events in which participants kill animals within a certain timeframe for entertainment, prizes, cash, or other inducements. Teams compete in judging categories that often focus on the number of animals killed, the weight or the sex of animals killed, the particular species killed, or the smallest or largest body or body part of the animal killed. Contests frequently involve betting and end with a check-in or weigh-in of the animals, followed by a party where contest prizes are awarded. Afterwards, the carcasses of the animals are usually dumped away from public view. Contests in Washington predominantly target native carnivores, and these events can result in hundreds of animals being wiped off a landscape in a single weekend.

Wildlife-killing contests have no place in a civil society or in modern wildlife management. Such contests are antithetical to the conservation ethic that is necessary to ensure

¹ Washington Department of Fish and Wildlife, Proposed Rulemaking, June 16, 2020. Available at: https://wdfw.wa.gov/sites/default/files/2020-06/wsr_20-13-088.pdf.

² *Id.*

the long-term protection of Washington’s wildlife heritage. Washington should follow the lead of other states by banning wildlife killing contests because these events: (1) are cruel and violate fundamental principles of ethical hunting, which damages the reputation of Washington sportsmen and sportswomen; (2) undermine modern, science-based wildlife management principles and are not an effective wildlife management tool; (3) do not increase populations of game animals; (4) do not prevent conflicts with humans, pets, or livestock—and may increase them; (5) may put threatened or endangered wildlife species in peril; and (6) have been banned in an increasing number of states due to growing public concern.

The remainder of these comments further explain why wildlife killing contests should be banned in Washington.

1. Wildlife killing contests are cruel and contravene hunting ethics.

The majority of Washington residents are likely to view enthusiasm for the mass killing of animals as barbaric, cruel, and wasteful, which violates fundamental principles of ethical hunting and could gravely taint both the image of sportsmen and sportswomen and of hunting in general. Killing contests violate principle four of the North American Model of Wildlife Conservation, which states “[w]ildlife can only be killed for a legitimate purpose. Wildlife is a shared resource that must not be wasted. The law prohibits killing wildlife for frivolous reasons.”³ Competing against other participants to kill as many animals as possible for entertainment, cash, and prizes is not a legitimate purpose—it is the height of frivolity.

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 codes of ethics for hunters. Among other things, such codes generally promote the concept of “fair chase” and decry indiscriminate killing. In killing contests, the carcasses of the animals are usually wasted, and the principles of fair chase are frequently disregarded, with participants using bait and electronic calling devices to attract animals with sounds that mimic prey or distress calls of wounded young. Furthermore, an untold number of animals are 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.

Investigation video footage has shown contest participants slinging dead coyotes and foxes into piles to be weighed and judged, joking about the methods used to lure and kill the animals, and laughing and posing for photos in front of a row of foxes strung up by their feet.⁴ Such behavior demonstrates a complete lack of respect for wildlife, promotes gratuitous violence, and sends the irresponsible and disturbing message that wanton killing is fun.

Numerous state agencies and officials have recognized that killing contests undermine the reputation of sportsmen and sportswomen and damage the tradition of hunting:

³ U.S. Fish and Wildlife Service, North American Model of Wildlife Conservation (Sept. 2018). Available at: <https://www.fws.gov/hunting/north-american-model-of-wildlife-conservation.html>.

⁴ 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>.

- 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.”⁵ He also called the contests “slaughter fests” and “stomach-turning examples of wanton waste.”⁶
- 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.”⁷
- 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 participate in one personally . . . wildlife killing contests give sportsmen and sportswomen a bad name and damage our reputation.”⁸
- 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 gain.”⁹
- 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.”¹⁰
- 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.”¹¹

⁵ Testimony by Mike Finley to the Oregon Senate Judiciary Committee, March 18, 2019. Available at: <https://olis.leg.state.or.us/liz/2019R1/Downloads/CommitteeMeetingDocument/200547>.

⁶ Todd Wilkinson, *A Death of Ethics: is hunting destroying itself?*, Mountain Journal, Dec. 12, 2018. Available at: <https://mountainjournal.org/hunting-in-america-faces-an-ethical-reckoning>.

⁷ Todd Wilkinson, *Shoot biggest wolf, win trophy and cash*, Jackson Hole News & Guide, Dec. 18, 2013. Available at:

https://www.jhnewsandguide.com/opinion/columnists/the_new_west_todd_wilkinson/article_260cbc66-0bf6-544b-bcf2-b5e9220247bb.html.

⁸ Colorado Parks and Wildlife Commission Meeting, Apr. 30, 2020. Available at: https://www.youtube.com/watch?v=5Vk7x_gx5PY.

⁹ 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>.

¹⁰ Ray Powell, Letter to Mark Chavez, owner of Gunhawk Firearms, Nov. 15, 2012.

¹¹ 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.

- 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”¹² and “[t]he net 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.”¹³
- 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.”¹⁴

Washington should likewise defend its reputation as a recreation destination by banning cruel and wasteful killing contests.

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

The indiscriminate killing promoted by wildlife killing contests is counterproductive to effective wildlife population management. Scientific studies have shown that many wildlife 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.¹⁵ This effect is well documented for coyote populations in particular, which are the species most commonly targeted by wildlife killing contest participants in Washington. The indiscriminate killing of coyotes increases their populations over time because it disrupts their social structure, which encourages higher levels of breeding and migration.¹⁶ This negatively impacts the

¹² Vermont Fish & Wildlife, Eastern Coyote Issues – A Closer Look (Jan. 2017). Available at: <https://vtfishandwildlife.com/sites/fishandwildlife/files/documents/Hunt/trapping/Eastern-Coyote-Position-Statement.pdf>.

¹³ Vermont Fish and Wildlife Dep’t, Vermont Coyote Population Report 6 (2018). Available at: <https://vtfishandwildlife.com/sites/fishandwildlife/files/documents/Hunt/trapping/Vermont%20Coyote%20Population%20Report%20to%20Legislature-2018.pdf>.

¹⁴ 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.

¹⁵ F. F. Knowlton, et al., *Coyote Depredation Control: An Interface between Biology and Management*, 52 *Journal of Range Management* 398, 400-402 (1999). Available at: <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). Available at: https://www.srs.fs.usda.gov/pubs/ja/2018/ja_2018_kilgo_002.pdf.

¹⁶ *Id.*; see also S.D. Gehrt, *Chicago Coyotes part II*, 11 *Wildlife Control Technologies* 20-21, 38-9, 42 (2004).

environment because coyotes are an integral part of healthy ecosystems.¹⁷ Coyotes help to control disease transmission by keeping rodent populations in check, consume carrion, remove sick animals from the gene pool, disperse seeds, protect ground-nesting birds from smaller carnivores, and increase the biological diversity of plant and wildlife communities.¹⁸

State wildlife management agencies across the country, including in Washington, have recognized that killing contests do not control coyote population size. WDFW has stated: “Despite . . . past efforts to eliminate coyotes, the species maintains its numbers and is increasing in some areas.”¹⁹ WDFW has also found that “it’s neither necessary nor possible to eliminate the entire population of coyotes in a given area.”²⁰ The New York State Department of Environmental Conservation stated: “random removal of coyotes resulting from a year-round hunting season will not . . . control or reduce coyote populations.”²¹ The Massachusetts Division of Fisheries & Wildlife stated: “hunting [would not] have an appreciable impact on coyote population size under any realistic scenarios.”²² The Vermont Fish & Wildlife Department made a similar finding, stating: “we do not believe such short-term hunts will have any measurable impact on regulating coyote populations” because “when coyote populations are exploited, productivity and pup survival increases.”²³ 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.²⁴ The Florida Fish & Wildlife Conservation Commission found: “[r]emoving coyotes for the purpose of eradication is an inefficient and ineffective method to control populations . . . hunting and trapping place pressure on coyote populations, and the species responds by reproducing at a

¹⁷ Fox, C.H. and C.M. Papouchis, *Coyotes in Our Midst: Coexisting with an Adaptable and Resilient Carnivore* 9 (2005). Available at: http://www.projectcoyote.com/Coyotes_In_Our_Midst.pdf.

¹⁸ 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). Available at: http://repository.uwyo.edu/cgi/viewcontent.cgi?article=1003&context=zooology_facpub; N. M. Waser et al., *Coyotes, Deer, and Wildflowers: Diverse Evidence Points to a Trophic Cascade*, 101 *Naturwissenschaften* 427 (2014).

¹⁹ Washington Department of Fish and Wildlife, *Coyotes*. Available at: <https://wdfw.wa.gov/species-habitats/species/canis-latrans#conflict>.

²⁰ *Id.*

²¹ New York State Department of Environmental Conservation, *The Status and Impact of Eastern Coyotes in Northern New York* (1991). Available at: http://www.dec.ny.gov/docs/wildlife_pdf/coystatny91.pdf.

²² 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). 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.

²³ Vermont Fish and Wildlife Dep’t, *Vermont Coyote Population Report 9* (2018). Available at: <https://vtfishandwildlife.com/sites/fishandwildlife/files/documents/Hunt/trapping/Vermont%20Coyote%20Population%20Report%20to%20Legislature-2018.pdf>.

²⁴ North Carolina Wildlife Resources Commission, *Coyote Management Plan 11*, 21-28 (2018). Available at: https://www.ncwildlife.org/Portals/0/Learning/documents/Species/Coyote%20Management%20Plan_FINAL_030118.pdf.

younger age and producing more pups per litter.”²⁵ Many other state wildlife management agencies, including those in Illinois, Kentucky, Louisiana, Missouri, New Hampshire, Nevada, South Carolina, Tennessee, West Virginia, and Wyoming, have reached similar conclusions.²⁶

3. 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,²⁷ followed by protection of habitat.²⁸ Considering that science, 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.²⁹

²⁵ Florida Fish and Wildlife Conservation Commission, Coyotes: Living with Coyotes. Available at: <https://myfwc.com/conservation/you- conserve/wildlife/coyotes/>.

²⁶ Illinois Dept. of Natural Resources, Coyote. Available at: <https://www.dnr.illinois.gov/conservation/wildlife/Pages/Coyote.aspx>; Kentucky Dept. of Fish & Wildlife Resources, Coyotes in the Suburbs. Available at: <https://fw.ky.gov/Wildlife/Documents/KAspring17coyotes.pdf>; Travis Dufour, *Living with Coyotes*, Louisiana Dept. of Wildlife & Fisheries Wildlife Division - Private Lands Program. Available at: 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). Available at: <https://mdc.mo.gov/blogs/more-quail/bounty-hunter>; New Hampshire Fish and Game, Eastern Coyote. Available at: <https://wildlife.state.nh.us/wildlife/profiles/coyote.html>; Nevada Dept. of Wildlife, Coyote. Available at: <http://www.ndow.org/Species/Furbearer/Coyote/>; National Wildlife Control Training Program, Coyotes. Available at: <http://www.dnr.sc.gov/wildlife/publications/nuisance/coyotes.pdf>; Tennessee Wildlife Resources Agency, Controlling Coyotes in Tennessee (Jan. 2003). Available at: <https://www.tn.gov/content/dam/tn/twra/documents/coyotecontrol.pdf>; Washington Dept. of Fish and Wildlife, Living with Wildlife. Available at: <http://wdfw.wa.gov/living/coyotes.html>; 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>.

²⁷ 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>.

²⁸ 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).

²⁹ 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/huntrapdigest.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->

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.”³⁰ 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.”³¹ 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.”³²

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.³³ 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.³⁴ The West Virginia Department of Natural Resources has found: “[p]redator control of coyotes because of wildlife predation is unwarranted and unnecessary.”³⁵ Regarding game birds, the North Carolina Wildlife Resources Commission found that coyotes actually benefit game bird species because they suppress populations of smaller predators and because “most coyote diet studies document low to no prevalence of wild turkey or other gamebirds in diets.”³⁶ These findings demonstrate that this common rationale for holding killing contests that target predators is scientifically unfounded.

[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>.

³⁰ New York State Dept. of Environmental Conservation, The Status and Impact of Eastern Coyotes in Northern New York (June 1991). Available at: <http://www.nysenvirothon.org/Referencesandother/coyotes.pdf>.

³¹ Jeff Mulhollem, *Pennsylvania Game Commissioners Reply to Unified Sportsmen of Pennsylvania on Predator Questions*, Outdoor News (July 22, 2016). Available at: <https://www.outdoornews.com/2016/07/22/pennsylvania-game-commissioners-reply-to-unified-sportsmen-of-pennsylvania-on-predators-questions/>.

³² Vermont Fish & Wildlife, Eastern Coyote Issues – A Closer Look (Jan. 2017). Available at: <https://vtfishandwildlife.com/sites/fishandwildlife/files/documents/Hunt/trapping/Eastern-Coyote-Position-Statement.pdf>.

³³ Charles Ruth, 2014 South Carolina Deer Harvest Report, South Carolina Dept. of Natural Resources. Available at: <http://www.dnr.sc.gov/wildlife/deer/2014DeerHarvest.pdf>.

³⁴ Eugenia V. Bragina et al., *Effects on white-tailed deer following eastern coyote colonization*, 83 J. of Wildlife Mgmt. 916 (2019).

³⁵ West Virginia Dept. of Natural Resources, Impacts of the Eastern Coyote on Wildlife Populations. Available at: <http://wvdnr.gov/hunting/CoyoteResearch.shtm>.

³⁶ North Carolina Wildlife Resources Commission, Coyote Management Plan 16 (2018).

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

Although some argue that contests are needed to reduce depredation of livestock, such contests are not effective in removing individual, problem-causing animals.³⁷ Most killing contests target predators in woodlands and grasslands where conflicts with humans, livestock, and pets are minimal. Studies have found that killing predators fragments social groups and can create ecological voids that may be filled by smaller predators with higher population numbers that may prey on livestock.³⁸ WDFW has advised that “prevention is the best tool for minimizing conflicts with coyotes and other wildlife” and that “[i]f your property is the home territory of coyotes that don’t harm livestock, they will keep away other coyotes that are potential livestock killers.”³⁹ WDFW has recognized that “coyotes also benefit ranchers and other property owners by helping control populations of mice, rats, voles, moles, gophers, rabbits, and hares.”⁴⁰

In a signed statement, more than 70 conservation scientists made 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 be more likely to kill livestock.⁴¹

³⁷ Adrian Treves et al., *Predator Control Should Not Be a Shot In the Dark*, 14 *Front Ecol Environ* 380, 381 (2016). Available at: http://faculty.nelson.wisc.edu/treves/pubs/Treves_Krofel_McManus.pdf.

³⁸ *Id.*

³⁹ Washington Department of Fish and Wildlife, Coyotes. Available at: <https://wdfw.wa.gov/species-habitats/species/canis-latrans#conflict>.

⁴⁰ *Id.*

⁴¹ Statement in Opposition to Wildlife Killing Contests: Signed By More Than 70 Conservation Scientists. Project Coyote (May 23, 2019). Available at <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);

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.⁴²

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).⁴³ 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.⁴⁴ Disease, illness, birthing problems, and weather constitute the overwhelming cause of livestock mortality.⁴⁵

5. Wildlife killing contests may put threatened or endangered wildlife species in peril.

Wildlife killing contests could result in incidental take of gray wolves and Canada lynx. Wildlife killing contests in Washington predominantly target coyotes, which could threaten gray wolves due to the species’ morphological similarities. Gray wolves are listed as endangered under the Endangered Species Act (“ESA”), 16 U.S.C. § 1531 *et seq.*, in the western two-thirds of the state. Killing contest targeting coyotes held in this area of the state pose a significant risk of incidental take of gray wolves, in violation of the ESA. Additionally, gray wolves are classified as endangered throughout Washington under state law,⁴⁶ which protects them from hunting, possession, malicious harassment, and killing.⁴⁷ As such, participants in killing contests that target coyotes held throughout the state risk violating state law as well.

Similarly, any wildlife killing contest that targets bobcats have the potential to result in take of Canada lynx. The two species are commonly mistaken for one another due to morphological similarities. Canada lynx, which are present in Washington, are listed as threatened under the ESA. Killing contests that target bobcats within lynx habitat in Washington may result in the incidental take of lynx, which would violate the ESA. Overall, it would be a

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). Available at:

<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).

⁴² F. F. Knowlton, et al., *Coyote Depredation Control: An Interface between Biology and Management*, 52 *J. of Range Mgmt.* 398, 403 (1999). Available at:

<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).

⁴³ See U.S. Dept. Agriculture, *Cattle and Calves Death Loss in the United States Due to Predator and Nonpredator Causes*, 2015 (2015). Available at:

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). Available at:

https://www.aphis.usda.gov/animal_health/nahms/sheep/downloads/sheepdeath/SheepDeathLoss2015.pdf

⁴⁴ North Carolina Wildlife Resources Commission, *Coyote Management Plan 10* (2018).

⁴⁵ *Id.*

⁴⁶ Wash. Ann. Code § 232-12-014

⁴⁷ R.C.W. § 77.15.120.

significant setback if the gains made toward recovering these two species were undermined by killing contests.

6. Six states have banned wildlife killing contests.

Six states have enacted bans on wildlife killing contests targeting certain species. These six states include the fellow western states of Colorado, California, Arizona, and New Mexico, as well as Vermont and Massachusetts. 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. Additionally, in 2017, the Maryland General Assembly placed a moratorium on contests targeting cownose rays, an aquatic species, until a fishery management plan is created. Six additional states, including Oregon, New York, New Jersey, Maryland, New Hampshire, and Wisconsin, either have currently pending legislation, or have had legislation introduced at some point in the past, that would ban wildlife killing contests. Washington should align itself with this positive trend in science-based wildlife management.

Conclusion

Wildlife killing contests have no place in a civil society or in modern wildlife management. Such contests are antithetical to the respectful, ethical, and pro-conservation message necessary to ensure the long-term protection of Washington's wildlife heritage. If you have any questions or if there is any additional information we can provide, please do not hesitate to contact me.

Sincerely,



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