

From: [Nadia Steinzor](#)
To: [Legislative Commission](#)
Subject: Comment: Amendment to NAC Chapter 503
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Dear members of the Nevada Legislative Commission:

Thank you for the opportunity to comment on the Regulation on your agenda allowing the adoption of a regulation amending Chapter 503 of the Nevada Administrative Code “establishing provisions related to coyote-hunting contests.”

Project Coyote urges the Board to reject the proposed regulation and to send it back to the Nevada Department of Wildlife and Wildlife Commission for revision based on sound science and ecological considerations.

Project Coyote notes that the agenda item is misnamed: the contests before you for regulatory approval are not “hunting” in any sense of the word. They are “killing contests,” events where participants compete to kill unlimited numbers of animals for cash and prizes. The wanton, indiscriminate nature of the contests is antithetical to hunting ethics and purposes. Hunters and wildlife managers nationwide acknowledge that killing animals without an adequate reason is unjustified and unsportsmanlike, and that killing an animal for a prize or trophy constitutes killing without an adequate reason.

The attached statement by more than 70 scientists emphasizes that there is no credible evidence that indiscriminate killing of coyotes or other carnivore species in Wildlife Killing Contests benefits ungulate populations or livestock producers. The Legislative Commission should reject attempts to allow them in Nevada based on inaccurate information and the private interests of a relatively few state residents.

Finally, public opinion is firmly against the continuance of Wildlife Killing Contests. Most notably, the city of Reno and the Clark County Commission—jurisdictions that represent over three-quarters of Nevada’s population—voted overwhelmingly to ban WKC for all species.

Thank you for your time and attention. Sincerely,

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F O S T E R I N G C O E X I S T E N C E



Statement in Opposition to Wildlife Killing Contests

Signed by more than 70 conservation scientists

On behalf of Project Coyote’s Science Advisory Board and the undersigned scientists, we express our support for the prohibition of wildlife killing contests—events in which participants compete to kill bobcats, coyotes, cougars, foxes, or even wolves for prizes or entertainment. These events are promoted throughout the United States.

The most general reason to prohibit wildlife killing contests is that hunters and wildlife managers believe, as a community, that killing animals without an adequate reason is unjustified and unsportsmanlike. Killing an animal for a prize or trophy constitutes killing without an adequate reason. Insomuch as wildlife killing contests are primarily motivated by killing for a prize or trophy, they are wrong.

Some advocates of killing contests argue that they are important for achieving management objectives for other species, especially game species. There is no credible evidence that indiscriminate killing of coyotes (the most common targets of killing contests) or other predators effectively serves any genuine interest in managing other species. If leaders in the hunting and wildlife management community believe that wildlife killing contests, in general, serve important objectives, then the principles of wildlife management mandate that (1) these objectives be articulated and vetted by the best-available science, and (2) some reasonable, science-based case be made to justify a killing contest as an appropriate means for achieving these objectives. In the absence of such an evaluation, these events should be prohibited.

Advocates of wildlife killing contests might argue that they are an important means for realizing one or both of these objectives: (1) decrease the loss of livestock to depredation, and (2) increase the abundance of prey species in the interest of maximizing hunting success by humans.

With respect to objective (1), a great deal of science has been developed on how to effectively manage depredations, including both lethal and non-lethal methods. Lessons from that science include:

- (i) Indiscriminate killing is ineffective and it is plausible, perhaps likely, that when associated with a killing contest it would lead to increased risk of depredations. A primary reason for this concern is that only some, often only a few, individual predators participate in depredation. Indiscriminate and “pre-emptive” killing of predators associated with these events can lead to the disruption of predators’ social structure and foraging ecology in ways that increase the likelihood of depredations. In hunted (exploited) coyote populations, for

example, the number of surviving pups that must be fed by the alpha parents and the number of transient individuals may increase. These factors may predispose more coyotes to depredate livestock.

- (ii) The indiscriminate killing associated with a wildlife killing contest does not target: (a) the offending predator, (b) the site where depredation has occurred, and (c) the time when depredation has occurred. This renders the competitions ineffective as a means of depredation control.

While managing to reduce the loss of livestock is a common goal for all stakeholders, wildlife killing contests do not contribute to this goal and may work against it.

With respect to objective (2), a large body of science indicates that killing predators, especially under circumstances associated with killing contests, is not a reliable means of increasing ungulate abundance. The circumstances most likely to result in increased ungulate abundance are also the circumstances most likely to impair important ecosystem benefits and services that predators provide. Even when predators are killed to the point of impairing the ecosystem services, there is still no assurance that ungulate abundance will increase. The reason being is that ungulate abundance is frequently limited by factors other than predators—factors such as habitat and climate.

Beyond objectives (1) and (2), which focus on affecting game populations and livestock depredations, lies a need to better recognize and celebrate the predators' valuable contribution to the health and vitality of our ecosystems. For example, predators serve human interests through beneficial effects such as rodent control and disease prevention and promoting diverse plant communities and soil fertility. Thus, reduction of the distribution and numbers of apex predators can have detrimental ecological effects.

Some advocates of wildlife killing contests might also believe that killing coyotes is vitally important for preventing coyote populations from growing out of control. This concern is unjustified. Science demonstrates that unexploited coyote populations self-regulate their numbers by means of dominant individuals defending non-overlapping territories and suppressing subordinate pack members from breeding.

Opposition to wildlife killing contests is growing rapidly. New Mexico and Vermont abolished coyote killing contests in 2019 and 2018, respectively. The California Fish and Game Commission banned the awarding of prizes for killing furbearing and nongame animals in 2014. Local governments in Arizona, New Mexico and Wisconsin have condemned the events.

In 2018, hunter and Chairman of the Oregon Fish and Wildlife Commission Mike Finley condemned wildlife killing contests as “slaughter fests” and “stomach-turning examples of wanton waste.” Former President of the California Fish and Game Commission and waterfowl hunter Mike Sutton denounced the events as “unethical” and “an anachronism [with] no place in modern wildlife management.” The Vermont Fish and Wildlife Department stated, “coyote hunting contests are not only ineffective at controlling coyote populations, but these kinds of competitive coyote hunts are raising concerns on the part of the public and could possibly jeopardize the future of hunting and affect access to private lands for all hunters.” The Wildlife Society issued a position statement in 2019 recognizing that “while species killed in contests can be legally killed in most states, making a contest of it may undermine the public’s view of ethical hunting” and discouraging “contests that portray hunting in an unethical fashion.”

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Appendix A. Additional Literature Cited

Here we provide additional scientific explanation (with citations) for two ideas expressed in this letter.

(1) 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 (Gipson 1975; Knowlton et al. 1999; Sacks et al. 1999a, 1999b; Linnell et al. 1999; Stahl and Vandel 2001; Blejwas et al. 2002; Treves et al. 2002; Treves and Naughton-Treves 2005). 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 (Gipson 1975; Sacks et al. 1999a, 1999b; Smith et al. 2000; Bangs and Shivik 2001). 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 (Bjorge and Gunson 1985; Haber 1996; Treves and Naughton-Treves 2005; Brainerd et al. 2008). These transient individuals that have not been acculturated (aversively conditioned) to living in areas with livestock may be more likely to kill livestock. Studies by USDA's Wildlife Services clearly indicate that many, if not most, depredations are inflicted by the breeders (i.e., alphas) in coyote social groups (Knowlton et al. 1999; Sacks et al. 1999b). Even if the offending individuals are removed, they can be replaced by other members of the social group or from populations outside the area where the WKC is occurring. In some cases, this can also increase reproductive performance in coyotes (Crabtree and Sheldon 1999; Knowlton et al. 1999).

Scientific evidence is increasingly suggesting that harvesting predators can exacerbate losses to livestock (Collins et al. 2002; Treves et al. 2010; Peebles et al. 2013, Wielgus and Peebles 2014).

(2) Some advocates of wildlife killing contests believe they are necessary or beneficial for increasing the abundance of ungulate populations. We had indicated in our letter that WKC are unlikely to have that effect. The reason why is two-fold:

- (i) Killing predators cannot result in increased ungulate abundance in cases where the ungulate population is not limited by predators, but is instead limited by other factors, such as climatic conditions or food availability (Sæther 1997; Forchhammer et al. 1998; Coulson et al. 2000; Parker et al 2009). Without careful study, the claim that killing predators will improve wild ungulate populations is simply an unsupported assumption. Moreover, scientists are not good at understanding the conditions that cause a population to be limited by predators as opposed to other factors (Vucetich et al. 2005; Wilmers et al. 2006). For example, an experimental study in Idaho (Hurley et al. 2011) found that annual removal of coyotes was not an effective method to increase mule deer populations because coyote removal increased neonate fawn survival only under particular combinations of prey densities and weather conditions.
- (ii) Even in cases where predators do limit prey abundance, human-caused mortality (HCM) could only lead to an increase in prey abundance if the rate of HCM was sufficient to result in a significant reduction in predator abundance. Human-caused mortality is not a reliable means of reducing coyote abundance unless the rate of HCM exceeds 70% (Connolly and Lonhurst 1975). It is difficult to imagine that any set of WKC would be intense enough or frequent enough to result in that rate of HCM.

Finally, the interest of some advocates of WKC (i.e., increased ungulate abundance) is antithetical to good natural resource management practices in cases where increased ungulate abundances present a risk of overbrowsing (e.g., Côté et al. 2004).

Thank you for allowing us to further explain ourselves. If additional explanation on this or any other topic would be of value, please let us know. We would be eager to provide any such explanations.

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