Dear Commissioners,

April 16, 2014

On behalf of Project Coyote’s Science Advisory Board and the undersigned scientists we express our support for a prohibition on wildlife killing contests (WKC), derbies and tournaments.

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

Some advocates argue that WKCs are not primarily motivated by killing for a prize, but rather are important means for achieving other management objectives. For many species, such as mule deer or ground squirrels, that claim appears incredulous. If leaders in the hunting and wildlife management community believe that WKCs, in general, serve important objectives, then the principles of wildlife management mandate that (1) these objectives need to be articulated and vetted by the best-available science, and (2) some reasonable, science-based case needs to be made to justify WKC as an appropriate means for achieving these objectives. In the absence of such an evaluation, WKCs should be prohibited.

Advocates might also argue that WKCs – when they are directed at predators, especially coyotes – 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, both lethal and non-lethal. Managing to reduce the loss of livestock is a common goal for all stakeholders. As such our scientific opinion is that WKCs do not contribute to this goal and may work against it. Lessons from that science include:

(i) Indiscriminate killing is ineffective and it is plausible, perhaps likely, that when associated with a WKC it would lead to increased risk of depredations. A primary reason for this concern is that only some, often few, individual predators participate in depredation. Indiscriminate and pre-emptive killing of predators associated with
WKCs can lead to the disruption of predators’ social and foraging ecology in ways that increase the likelihood of depredations. In coyote populations, for example, the number of surviving pups that must be fed by the alpha parents increases, and surviving pack members that become transient individuals, may be predisposed to depredate livestock.

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

With respect to objective (2), a great deal of science has been developed which indicates that killing predators, especially under the circumstances that are associated with WKCs, 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 the valid concern of WKC affecting game populations and livestock depredations, lies the need for increased recognition of the valuable role predators play in maintaining healthy ecosystems and their contribution to ecosystem services. When not killed (exploited), they self-regulate their populations by means of dominant individuals defending non-overlapping territories. This structure can be disrupted by killing as little as one individual, which can then result in dispersal of remaining individuals that may seek novel prey items including livestock. There is also an extant scientific literature on the ecosystem services they provide to humans though rodent control and disease prevention. Recent research has also shown that apex predators play a vital role in maintaining ecosystem structure and function by facilitation of ‘trophic cascades’ leading to positive changes in plant communities, soil fertility, and physical processes (e.g., erosion and stream geomorphology). Thus, reduction of the distribution and numbers of apex predators can have profound negative effects that contribute to ecological instability and loss of services to humans.

The Boone and Crockett Club, founded by Theodore Roosevelt in 1887 "over the concerns that we might someday lose our hunting privileges and the wildlife populations for future generations"\(^1\), is still considered one of the most respected sportsmen’s institutions in North America. The Club “does not support programs, contests or competitions that directly place a bounty on game animals by awarding cash or expensive prizes for the taking of wildlife”\(^2\) because WKCs contravene the Club’s “fair-chase” motto.

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Thank you for your consideration of these concerns on this important issue. If the Commission were interested to know about the support for any of the claims in this letter, we would be honored to further present and discuss the science and scholarship with the Commission.

Respectfully submitted,

Robert Crabtree, PhD
Victoria, BC
Founder & Chief Scientist Yellowstone Ecological Research Center
Research Associate Professor, Department of Ecosystem and Conservation Science, University of Montana
Science Advisory Board, Project Coyote

John A. Vucetich, PhD
Houghton, MI
Associate Professor
School of Forest Resources and Environmental Science
Michigan Technological Univ.
Science Advisory Board, Project Coyote

David Parsons, MS
Albuquerque, NM
Carnivore Conservation Biologist, Rewilding Institute
Science Advisory Board, Project Coyote

Michael P. Nelson, PhD
Corvallis, OR
Professor, and Ruth H. Spaniol Chair of Renewable Resources
Oregon State University
Science Advisory Board, Project Coyote

Michael Soulé, PhD
Paonia, CO
Professor Emeritus
Dept. Environmental Studies, University of California, Santa Cruz
Co-founder, Society for Conservation Biology
Science Advisory Board, Project Coyote
Jeremy T. Bruskotter, PhD
Columbus, Ohio
Associate Professor School of Environment & Natural Resources
The Ohio State University
Science Advisory Board, Project Coyote

Marc Bekoff, PhD
Boulder, CO
Professor Emeritus, University of Colorado, Boulder
Science Advisory Board, Project Coyote

Bradley J. Bergstrom, Ph.D.
Valdosta, GA
Professor of Biology, Valdosta State University
Science Advisory Board, Project Coyote

Shelley M. Alexander, PhD
Associate Professor, Geography, University of Calgary
Science Advisory Board, Project Coyote

Adrian Treves, PhD
Madison, WI
Associate Professor
University of Wisconsin-Madison
Science Advisory Board, Project Coyote

Jennifer Wolch, PhD
Berkeley California
Dean, College of Environmental Design
Science Advisory Board, Project Coyote

William J. Ripple, PhD
Corvallis, OR
Distinguished Professor of Ecology, Oregon State University

Rick Hopkins, PhD
San Jose CA
Principal and Senior Conservation Biologist, Live Oak Associates, Inc.
President of the Board, Cougar Fund
Paul Beier, PhD
Regents’ Professor, School of Forestry, Northern Arizona University, Flagstaff AZ
Past President, Society for Conservation Biology

David Mattson, PhD
Livingston, MT
Lecturer and Senior Visiting Scientist, Yale School of Forestry & Environmental Studies
USGS Colorado Plateau Research Station Leader (retired)
USGS Research Wildlife Biologist (retired)
Past Western Field Director, MIT-USGS Science Impact Collaborative

Melissa Savage, PhD
Los Angeles, CA
Professor Emerita
University of California, Los Angeles

Reed F. Noss, PhD
Orlando, Florida
Provost’s Distinguished Research Professor
University of Central Florida
Past-President, Society for Conservation Biology
Past Editor-in-Chief, Conservation Biology

Philip Hedrick PhD
Tempe, AZ
Ullman Professor of Conservation Biology
Arizona State University

Megan Isadore
Co-founder and Executive Director
River Otter Ecology Project
Forest Knolls, CA
Member, IUCN Otter Specialist Group
Founder, Good Riddance! Wildlife Exclusions, LLC

David Fraser, PhD
Vancouver, Canada
Professor
University of British Columbia

Bernard E. Rollin, PhD
University Distinguished Professor
Professor of Philosophy
Professor of Animal Sciences
Professor of Biomedical Sciences
University Bioethicist

Malcolm R. MacPherson, PhD
Santa Fe, New Mexico
Retired scientist
Member AAAS and the Society for Conservation Biology

Simon Gadbois, PhD
Halifax, NS, Canada
Director of the Canid Behaviour Research Team
Dalhousie University, Canada

Zoe Jewell, Vet MB, MRCVS
Durham, NC
Visiting research scientist, Duke University

Chris Dairmont, PhD
Victoria, BC
Hakai-Raincoast Professor
University of Victoria

Dale Jamieson PhD
New York, NY
Professor of Environmental Studies, Philosophy, and Bioethics, Affiliated Professor of Law,
Director of the Animal Studies Initiative
New York University

Kevin Crooks PhD
Fort Collins, CO
Monfort Professor, Department of Fish, Wildlife, and Conservation Biology
Colorado State University

William Lynn, PhD
Marlborough, MA
Research Scientist
Marsh Institute, Clark University

Jonathan Way, PhD
Osterville, MA
Eastern Coyote Research
Research Scientist, Clark University
Bob Ferris, MA  
Eugene, OR  
Executive Director, Cascadia Wildlands  

Geri T. Vistein, MS  
Brunswick, Maine  
Carnivore Conservation Biologist  
Founder of Coyote Lives in Maine  

Lisa Micheli, PhD  
Santa Rosa, CA  
Executive Director  
Pepperwood’s Dwight Center for Conservation Science  

Winston Thomas, PhD  
San Mateo, CA  
Founder and CEO, Canine Genetics, LLC  

Megan M. Draheim, PhD  
Washington, DC  
Visiting Assistant Professor  
Virginia Tech  

Stephen F. Stringham, PhD  
Soldotna, AK  
Predator Biologist  
President, WildWatch Consulting  
Chair, Advisory Committee, BEAR League  

Bonny Laura Schumaker, PhD  
La Canada, CA  
Physicist & Technical Manager, Retired  
(Theoretical Astrophysics and Remote Sensing)  
California institute of Technology / Jet Propulsion Laboratory  
Founder and President, OnWingsOfCare.org