

PROJECT COYOTE

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



May 10, 2019

Arizona Game and Fish Department
Attn.: Rules Section
5000 W. Carefree Highway
Phoenix, AZ 85086

Re: Support for a ban on wildlife killing contests in Arizona

Dear Arizona Game and Fish Commission:

As Arizona residents, and on behalf of Project Coyote and our Arizona supporters, we thank you for proposing a rule to ban wildlife killing contests in the state. These events are receiving intense public scrutiny across Arizona and the entire United States. Wildlife killing contests threaten the future of hunting and are ecologically destructive and counterproductive to sound wildlife management. They are a bloodsport similar to dogfighting and cockfighting, which have been outlawed in every state.

For these reasons, we strongly support a rule to ban wildlife killing contests in Arizona. We also respectfully urge you to incorporate minor changes to the language of the proposed rule that will safeguard all unprotected wildlife, close loopholes, and enhance enforcement.

We encourage you to consider the following changes to the proposed rule:

"ARTICLE 3. TAKING AND HANDLING OF WILDLIFE
R12-4-303. Unlawful Devices, Methods, and Ammunition:

- i. Participate in, organize, promote, sponsor, or solicit participation in a contest where a participant uses or intends to use any device or implement to capture or kill nongame animals, predatory animals or fur-bearing animals as defined under A.R.S. § 17-101. For the purposes of this subsection, "contest" means an an organized or sponsored competition with the objective of taking or killing nongame animals, predatory animals or fur-bearing animals for entertainment, prizes, cash, or other inducements. ~~among participants where participants must register or record entry and pay a fee and prizes or cash are awarded to winning or successful participants.~~

We believe these changes are important for the following reasons:

- Contest sponsors provide incentives to participate in the events in the form of prizes including guns and hunting equipment. Including "sponsor" in the rule will eliminate or reduce motivations to participate in these contests.
- It is important to ban contests targeting nongame animals. If only predatory and fur-bearing animal contests are banned, it is likely that organizers will shift to targeting nongame animals. Prairie dog contests are common in other states. The public will not be favorable to the continuance of contests for nongame animals.

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- Striking “where participants must register or record entry and pay a fee” removes loopholes that would allow the contests to continue. For example, organizers may create a nonprofit that accepts donations in lieu of entry fees; or, organizers may accept informal registration that cannot be tracked, such as verbal affirmation. Instead, we propose adding “organized or sponsored” before “competition” to ensure that the rule indeed targets only coordinated, competitive events.
- Including “inducements” and “entertainment” in the rule will eliminate contests for bragging rights, social media glorification, or other incentives such as certificates and traveling trophies. Allowing these contests to continue for entertainment or other inducements would present the same problems as contests for cash or prizes—indiscriminate, ecologically destructive killing of wildlife and threats to the future of hunting. Members of the public will view these contests as ethically indefensible whether or not the participants win cash and prizes.

Thank you for your consideration of these changes and the proposed rule to ban killing contests. Abolishing these cruel and senseless events will protect the reputation of hunters, demonstrate that Arizona Game and Fish protects all wildlife for all citizens, and help ensure healthy and sustainable ecosystems in our state. Attached to this letter (and at the links provided) is a [statement signed by more than 70 prominent conservation scientists](#) condemning coyote killing contests, and a [factsheet](#) by our Science Advisory Board that uses peer-reviewed science to explain why indiscriminately killing coyotes is counterproductive.

We would be happy to speak with you further about this issue.

Sincerely,

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