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August 15, 2022

To: John Rogner, Assistant Director

Illinois Department of Natural Resources

1 Natural Resources Way

Springfield, Illinois 62702

Phone: 217-782-6302

Re: Petition to prohibit wildlife killing contests in Illinois through agency rulemaking

Via: john.rogner@illinois.gov

Esteemed Assistant Director Rogner,

On behalf of Project Coyote, The Rewilding Institute and our Illinois supporters, we are petitioning the Illinois Department of Natural Resources' (IDNR) to prohibit wildlife killing contests (WKC) through agency rulemaking, as done by several other states. In WKC, participants compete to kill most commonly coyotes, but also foxes and raccoons for prizes and entertainment. Along with our petition, we submit information on the occurrence and potential impacts of WKC in Illinois.

We provide an overview of the known WKC events in Illinois for the past several years, along with an initial spatial and ecological analysis (including state maps) of impacts by county, on public lands, ecological connectivity, and IDNR Conservation Opportunity Areas (COAs). We supplement this information with the latest scientific literature on why WKC do not serve any conservation or ecological management purpose (including a statement by over 70 premier conservation scientists), and discuss various ecological concerns tied to WKC activities (including implications for initiatives like Illinois 30x30).

WKC actively foster cruelty and contempt for wild animals and nature, in addition to wanton waste of the animals killed, in people of all ages.¹ These motivations and values are directly opposed to the values of care, respect for, and coexistence with animals and nature shared by the broad public and promoted by public agencies. A recent poll by Remington Research Group² shows that over three-quarters of Illinoisians agree with the scientific

¹ Some WKC, such as the Coyotes For Kids Hunting Tournament in Manito, Mason County, directly encourage children's participation. See <https://www.facebook.com/coyotesforkids>

² https://www.humanesociety.org/sites/default/files/docs/HSUS_IL-Public-Opinion-TABS-04-2022.pdf

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literature in considering wild animals such as coyotes, foxes and bobcats to be important to Illinois ecosystems, and the IDNR has publicly supported such views and science.³ The same poll shows that close to two-thirds of Illinoisians would support a ban on WKC's if supplied with minimal information on their occurrence and impacts. The broad public is generally unaware of the existence of such contests, let alone their occurrence in their state or county.

Numerous state agencies and officials have recognized that killing contests are contrary to adequate wildlife management and undermine the reputation of hunters:

- **Michael Sutton, hunter and former president of California Fish and Game Commission** stated: “Awarding prizes for wildlife killing contests is both unethical and inconsistent with our current understanding of natural systems. Such contests are an anachronism and have no place in modern wildlife management.”⁴
- **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.”⁵
- **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.”⁶
- **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”⁷ and “[t]enet four of the North American Model, ‘wildlife can be killed only for

³ “Coyotes are valuable members of the wildlife community and do more good than harm where humans are concerned.” (“Coyote,” Illinois Department of Natural Resources, <https://www.dnr.illinois.gov/conservation/wildlife/Pages/Coyote.aspx>)

⁴ Ted Williams, “Coyote Carnage: The Gruesome Truth about Wildlife Killing Contests,” Yale Environment 350, May 22, 2018, <https://e360.yale.edu/features/coyote-carnage-the-gruesome-truth-about-wildlife-killing-contests>.

⁵ Nevada Department of Wildlife November Wildlife Commission Meeting, Nov. 5, 2021. Available at: https://www.youtube.com/watch?v=ELXWYyLr_f8.

⁶ 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-NP_RM.pdf.

⁷ Vermont Fish & Wildlife, Eastern Coyote Issues – A Closer Look (Jan. 2017). Available at:

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a legitimate purpose,⁷ 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.”⁸

- **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.”⁹ He also called the contests “slaughter fests” and “stomach-turning examples of wanton waste.”¹⁰
- **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.”¹¹
- **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.”¹²
- **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

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

⁸ 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>.

⁹ 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>.

¹⁰ 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>.

¹¹ 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.

¹² 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.

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are about personal profit, animal cruelty It is time to outlaw this highly destructive activity.”¹³

- **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.”¹⁴
- **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.”¹⁵
- **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.’¹⁶

We provide this information with the aim of working with the IDNR to prohibit such contests on state and private lands. Eight states- Arizona, California, Colorado, Massachusetts, Maryland, New Mexico, Vermont, and Washington- have recognized the incalculable and widespread social and ecological harm resulting from WKC’s and have banned them. In five of those states – Arizona, California, Colorado, Massachusetts and Washington – the bans were enacted through commission or agency rulemaking, and included measures such as: outright prohibition of contests, prohibitions of wanton waste, setting closed seasons, harvest limits, and reporting requirements for coyotes and other species, among other regulations.¹⁷ In New Mexico, the state lands commissioner first banned contests through executive order, recognizing how killing contests undermined state trust resources and were ineffective in achieving their purported aims. Then the New Mexico legislature banned WKC’s statewide in 2019.

¹³ Ray Powell, Letter to Mark Chavez, owner of Gunhawk Firearms, Nov. 15, 2012.

¹⁴ 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.

¹⁵ Washington State Fish and Wildlife Commission Meeting, August 1, 2020. Available at: <https://www.tvw.org/watch/?eventID=2020081003>.

¹⁶ Colorado Parks and Wildlife Commission Meeting, Apr. 30, 2020. Available at: https://www.youtube.com/watch?v=5Vk7x_gx5PY.

¹⁷ Massachusetts Division of Fisheries & Wildlife. Regulations to prohibit wanton waste and predator contests approved. December 20, 2019.

<https://www.mass.gov/news/regulations-to-prohibit-wanton-waste-and-predator-contests-approved>



Moreover, concerns over WKC have reached the national policy agenda, as evidenced by the recent introduction of the Prohibit Wildlife Killing Contests Act (H.R. 7938) to the United States House of Representatives by congressman Steve Cohen (TN-09), with 22 co-sponsors to date.¹⁸ The bill makes it unlawful for any person(s) to organize, sponsor, conduct, or participate in wildlife killing contests on public lands, with limited exceptions for wildlife management purposes.¹⁹ However, this bill would only apply to federal public lands, and therefore state action is still needed to prohibit such contests on state lands.

Occurrence of and potential impacts of WKC in Illinois (See appended maps)

Wildlife killing contests in Illinois are usually held between October and March, during the furbearer open season and when the targeted individuals -coyotes, foxes and raccoons- are easier to track. The contests exploit the lack of: harvest limits, restrictions on killing and other devices or methods (e.g., baiting, night lights), and reporting requirements for the targeted species.

- *WKC events* - our coalition has identified 20 WKC event ‘weigh-in’ locations. WKC events identified were held throughout the state between 2015-2022. This number of events represents a minimum of WKC events often held yearly rather than all existing events, given their clandestine nature and concealment from the general public.
- *Impacted counties* - between 17-20 Illinois counties, distributed across the state, regularly host WKC events (weigh-in locations may change yearly) and so are directly impacted. Another 51 counties around the host counties are presumably impacted, given the amount of participants and scale of killing. In fact, many WKC events, such as the Southern Predator Challenge, encourage participation in all counties. Hence, the remaining counties (28 adjacent to those presumably impacted, and 3 with no data) may be impacted as well.
- *Protected lands* - over 10% of the total area of protected lands (e.g., nature preserves) in Illinois is located within directly impacted counties, 44% in presumably impacted counties, and 41% in possibly impacted counties. Overall, >90% of protected lands may be impacted by WKC events.
- *Rivers* - all identified WKC events are located within 5 miles of rivers, including multiple WKC events near protected lands by the Mississippi, Illinois and Sangamon rivers. (See below for details on the potential impacts to riparian areas.)
- *IDNR Conservation Opportunity Areas* - Most WKC events are found within or adjacent to every IDNR COA.

¹⁸ See <https://www.congress.gov/bills/117/congress/house-bills/7398/overview=closed>

¹⁹ A similar bill, H.R. 4372, Prohibit Wildlife Contests, was introduced in the Illinois General Assembly by Reps. A. Moeller and J. Gong-Gershowitz and was referred to the Rules Committee. See

<https://ilga.gov/legislation/BillStatus.asp?DocNum=4372&GAID=16&DocTypeID=HB&GA=&SessionID=110>.

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Summary of key points from Science Letter re: impacts of Wildlife Killing Contests (See appended scientists statement and literature)

WKC's can be classified as an extreme form of lethal intervention, given participants are encouraged to *maximize* the killing of wildlife indiscriminately and across the landscape. Accordingly, the appended letter and scientific literature address the negative ecological impacts of lethal interventions in general. The evidence suggest widespread, indiscriminate killing:

- Does not resolve human-wildlife conflicts, such as predation on domestic animals, because it does not target the individual(s), site(s) or time(s) when the incident(s) occurred. Killing may even lead to increased risk of predation through disruptions of individual behavior and social dynamics.²⁰
- Does not result in increased prey populations, which are frequently regulated by more limiting factors, such as lack of suitable habitat and climate.^{21,22}
- Does not result in decreased coyote populations, given killing tends to catalyze an increased reproductive response that overcompensates for their killing through increased litters and pup survival.

Moreover, there is no credible scientific evidence suggesting that the indiscriminate and widespread killing of species targeted by Illinois' WKC's serves any conservation or wildlife management purpose. Finally, scientific studies specific to WKC's are currently unfeasible given the nature of the contests: killing is encouraged across the landscape, with participants not having to disclose where they hunted or how many individuals were killed in each area visited (which complicates selection of treated and control sites for data collection and comparison). The scientific evidence on the negative impacts of lethal methods used in WKC's (see also ecological impacts below and appended public comments), alongside the magnitude and distribution of the killing promoted by these contests, mean that the burden of proof is on contest

²⁰ "Eliminating all of the coyotes in an area is not a realistic goal because voids will be filled quickly. Fortunately, removing individuals with 'bad behaviors' usually solves a problem even when other coyotes continue to live in an area." (<https://www.dnr.illinois.gov/conservation/wildlife/Pages/Coyote.aspx>)

²¹ Hunting groups such as the National Wild Turkey Federation and Ducks Unlimited have both opposed predator control for such purposes. See appended document with statements of wildlife managers and hunting groups on wildlife killing contests. For examples, see the National Wild Turkey Federation, *Coexisting With Predators*: <https://www.nwtf.org/conservation/article/coexist-predators>, and Ducks Unlimited, *Prairies Under Siege: Ducks, Habitat Conservation & Predators*: <https://www.ducks.org/conservation/where-ducks-unlimited-works/prairie-pothole-region/prairies-under-siege-ducks-habitat-conservation-predators>.

²² "While predators do eat some game birds and rabbits, this is not what is causing our long-term decline. If we had adequate habitat (quantity and quality), there would be more game on the landscape." (Illinois Dept. of Natural Resources, Illinois Digest of Hunting and Trapping Regulations: 2019-2020. Available at: <https://www.dnr.illinois.gov/hunting/documents/hunttrapdigest.pdf>)

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participants and proponents to provide any credible evidence that such contests serve clear ecological and management purposes. Because contest proponents have failed to provide such evidence in a decade of debate, contests must be prohibited.

Ecological concerns (See appended PC comments to Illinois 30x30 Task Force)

The distribution of such widespread and indiscriminate killing across the Illinois landscape could result in substantial ecological harm through the impairment of important ecological processes and state conservation initiatives, including:

- *Top-down regulation* - Predators like coyotes exert critical top-down regulation on other species, and provide a number of ecological services such as: disease control, rodent suppression, carrion clean-up and crop protection. The absence of top-down regulation by apex predators can temporarily increase the risk of predation by mesopredators on imperiled species, especially around fragmented habitat edges, virtually reducing suitable species habitat. Moreover, widespread killing of mesopredators like foxes and raccoons may also increase their density, both through increased reproduction and through immigration (which can deplete adjacent areas).
- *Connectivity and resiliency* - Riparian corridors are essential for connectivity of wildlife populations. In human-dominated systems, such as most of Illinois, core habitat areas without connectivity are doomed to conservation failure. Restrictions in movement limit species' numbers, distribution and genetic variability, all leading to a decrease in biodiversity. Connectivity is critical for many animals and plants because it allows them to achieve natural populations through unrestricted genetic dispersal, which also increases habitats' resilience to climate change. WKC's deplete areas of most predatory wildlife, disrupting essential natural processes that promote biodiversity and harming our entire ecological community. By allowing for connectivity and adequate top-down regulation, we can increase the resilience of species to changing environmental conditions and their continued persistence.
- *Illinois 30x30 Initiative* - WKC's habitually degrade natural habitat by depleting areas of predator populations integral to ecological processes and resilience. Thus, WKC's could be considered a widespread form of harmful, unregulated land use focused strictly on wildlife depletion. A bold initiative to *protect* the natural lands and waters of Illinois for the broad public like Illinois 30x30 should preclude such ecological harm by a minority of individuals who enjoy killing wildlife for prizes and entertainment. Moreover, equitable access to the outdoors such as that promoted by Illinois 30x30 means equitable opportunity for the broad public to contemplate living wildlife and flourishing wild lands with naturally-regulated processes, rather than the scant wildlife and degraded landscapes

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left in the wake of WKC's. Hence, we suggest WKC's are incompatible with forward-looking environmental state initiatives and their social justice objectives.

Beyond our request to consider the above and prohibit wildlife killing contests through rulemaking, we aver a more sophisticated understanding of ecological interactions demands robust limits to the killing of such species as coyotes, foxes, raccoons, and others, for the sake of resilient ecosystems and equitable enjoyment of what should be rewilded lands.

Thank you for considering the above information and request. We would be happy to contribute additional resources and scientific literature as needed. We look forward to working with you to foster coexistence and rewilding integral to the wellbeing of people, animals and nature in The Prairie State.

Sincerely,

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Science & Conservation Manager
Project Coyote & The Rewilding Institute

Michelle L. Lute, Ph.D.
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Appendices

- Illinois WKC Maps
 - Impact of WKC's in Illinois by County
 - Impact of WKC's in Illinois on Natural preserves
 - Impact of WKC's in Illinois on Connectivity
 - Impact of WKC's in IDNR Conservation Opportunity Areas
 - Social Impact of WKC's in Illinois
- Statement in Opposition to Wildlife Killing Contests, Signed by more than 70 conservation scientists
- Project Coyote & The Rewilding Institute Public Comments on Illinois 30x30

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