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JILL FRITZ
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Wildlife Protection
Humane Society of the United States

Animal Legal Defense Fund
Animal Protection New Mexico
Animal Protection Voters (New Mexico)
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Atlanta Coyote Project
Born Free USA
Center for Biological Diversity
Endangered Species Coalition
Friends of the Wisconsin Wolf & Wildlife
Grand Canyon Wolf Recovery Project
The Humane Society of the United States
Massachusetts Society for the
Prevention of Cruelty to Animals
Mountain Lion Foundation
National Wolfwatcher Coalition
Natural Resources Defense Council
New Hampshire Wildlife Coalition
Pegasus Foundation
Pettus-Crowe Foundation
Plan B to Save Wolves
Project Coyote
Protect Our Wildlife Vermont
Southwest Environmental Center
Speak for Wolves
Western Environmental Law Center
Western Wildlife Conservancy
WildEarth Guardians
Wyoming Untrapped

June 19, 2018

The Honorable Nathan Deal
Office of the Governor
206 Washington Street
111 State Capitol
Atlanta, Georgia 30334

Mr. Mark Williams, Commissioner
Georgia Department of Natural Resources
2 Martin Luther King Jr. Drive, SE Suite 1252
Atlanta, Georgia 30334

Mr. Rusty Garrison, Director
Georgia Wildlife Resources Division
2067 U.S. Hwy. 278, SE
Social Circle, Georgia 30025

Re: Opposition to the Georgia Coyote Challenge

Dear Governor Deal, Commissioner Williams, and Director Garrison:

On behalf of the National Coalition to End Wildlife Killing Contests and our Georgia-based members and supporters, we would like to express our opposition to the Georgia Coyote Challenge that takes place from March to August 2018. This event, in which hunters and trappers seek to kill coyotes for the chance to win a lifetime hunting license, is out of step with our current understanding of the important role wild carnivores play in our ecosystems and is counterproductive to sound, science-based wildlife management.

The Georgia Coyote Challenge amounts to a state-sanctioned killing contest, in which participants compete to kill coyotes for cash, prizes, or in this case, a lifetime hunting license. Killing contests are antithetical to responsible hunting ethics that encourage respect for wildlife and their habitat and discourage non-frivolous use of wildlife. This event is also akin to a bounty program, which the Georgia Department of Natural Resources (DNR) itself opposes. Both are government-sanctioned programs that provide financial incentives to hunters to indiscriminately kill wild animals. The Georgia DNR's 2015-2024 Deer Management Plan states that the Wildlife Resources Division and the General Assembly "oppose county bounty programs because there is no documented scientific evidence indicating that bounty programs temporarily or permanently reduce coyote abundance."¹

To better reflect modern scientific understanding of natural ecosystems and to better align with the view of Georgia residents that animals—including wildlife—should be treated humanely, we respectfully urge you to cancel the

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Coyote Challenge and to consider prohibiting similar events in the state of Georgia. We offer the following support for this request.

- I. **This wildlife killing contest is opposed by a significant number of Georgia citizens, as well as Georgia-based animal and wildlife protection organizations.**

Last spring, a letter was presented to you in opposition to the Georgia Coyote Challenge, from organizations including the Atlanta Humane Society, the Atlanta Coyote Project, Lifeline Animal Project, The Georgia Chapter of the Sierra Club, the League of Humane Voters, Georgia Animal Rights & Protection, AWARE Wildlife Center in Lithonia, Project Coyote, and the Georgia state director for The Humane Society of the United States.

In addition, more than 250 Georgia residents and concerned citizens have registered their opposition to the Georgia Coyote Challenge to the Georgia Wildlife Resources Division (GWRD) since the initiation of the Coyote Challenge. Comparatively, the GWRD received support for the Coyote Challenge from only a single person. Following are examples of the public comments in opposition:

“As a taxpaying voter, I want our wildlife and public lands protected! This coyote killing contest which is to begin in March is ill advised and inhumane. Please cancel this terrible event and instead focus on co-habitation with wildlife so we can preserve it for generations to come.”

“Please do not promote irresponsible ‘sport’ killing of coyotes via killing contests. Coyotes are very intelligent and also beneficial to the environment. People who are speaking out for coyotes are promoting a higher standard and agenda for wildlife ‘management’ and we definitely hold state wild management departments to the highest standards for overseeing our wildlife.”

“I know Georgia’s people are good and kind hearted. Please don’t kill for sport. You are better than that.”

- II. **Wildlife killing contests contravene modern, science-based wildlife management principles, and could damage the reputation of Georgia sportsmen and sportswomen.**

State wildlife agencies hold and manage wildlife in the public’s trust, and those that allow wildlife killing contests risk besmirching all hunting. Vermont’s Fish & Wildlife Department has noted, “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.”²

Last year Project Coyote submitted a letter signed by more than 50 scientists to the Georgia DNR that refutes the claims that wildlife killing contests targeting





predators are an effective way to manage predator populations. Using peer-reviewed science, that letter showed there is no scientific evidence that supports the notion that the mass and indiscriminate killing of predators in killing contests reduces livestock losses, boosts ungulate populations or effectively reduces coyote populations.³

III. The Coyote Challenge will not protect native wildlife or increase game populations.

In response to concerns from hunters that wild carnivores may be diminishing populations of small game animals, the Pennsylvania Game Commission issued the following statement in 2016:⁴

“During the late 1800s and early 1900s, the Game Commission focused much of its energy and resources into predator control efforts. During this period, we did not understand the relationship between predators and prey. **After decades of using predator control (such as paying bounties) with no effect, and the emergence of wildlife management as a science, the agency finally accepted the reality that predator control does not work.** . . . To truly serve sportsmen, we must focus on proven means to restore small game hunting. And we do this by improving the habitat. . . . You can’t manage wildlife based on what makes intuitive sense, or based on anecdotal information. . . . Practices such as forestry and farming dictate the abundance of small game, not predators. **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. The limiting factor is habitat – we must focus our efforts on habitat.**” (Emphasis added.)

The best available science demonstrates that killing wild carnivores to increase ungulate populations is unlikely to produce positive results because the key to ungulate survival is protecting breeding females and access to adequate nutrition, not predation.⁵ Comprehensive studies, including those conducted in Colorado⁶ and Idaho,⁷ show that killing wild carnivores fails to increase deer numbers.

In recommending against a year-round hunting season on coyotes, the New York State Department of Environmental Conservation based their decision in part on the fact that “random removal of coyotes resulting from a year-round





hunting season will not: (a) control or reduce coyote populations; (b) reduce or eliminate predation on livestock; or (c) result in an increase in deer densities.”⁸

Rather than focusing on any one species, coyotes are opportunists who eat a diverse diet including mammals, birds, amphibians, reptiles, fish, insects, fruit, vegetables, and plant material. Their favorite prey are rabbits and rodents.⁹

IV. Lethal control of coyotes is a temporary fix that ultimately leads to an increase in the population.

The evidence is clear: More than 100 years of coyote killing has not reduced their populations. In fact, since 1850 when mass killings of coyotes began, the range of this species has tripled in the United States.¹⁰

Indiscriminate killing of coyotes can stimulate increases in their populations. Persecution of coyotes disrupts their social structure, which, ironically, encourages more breeding and migration, and ultimately results in more coyotes.¹¹ The alpha pair in a pack of coyotes is normally the only one that reproduces. When one or both members of the alpha pair are killed, other pairs will form and reproduce. At the same time, lone coyotes will move in to mate, young coyotes will start having offspring sooner, and pup survival may increase.¹² While widespread killing may temporarily reduce coyote numbers in a given area, coyotes bounce back quickly, even when up to 70 percent of their numbers are removed.¹³

It’s impossible to completely eradicate coyotes from an area.¹⁴ New coyotes will quickly replace vacant territorial niches where coyotes who have been removed. Coyote pairs hold territories, which leaves single coyotes (“floaters”) continually looking for new places to call home.¹⁵

The Vermont Fish & Wildlife Department recently questioned the effectiveness of wildlife killing contests, stating that, “we do not believe such short-term hunts will have any measurable impact on regulating coyote populations, nor will they bolster populations of deer or other game species.”¹⁶

In early March, Georgia Department of Natural Resources deer biologist Charlie Killmaster told Channel 2 Action News that the Georgia killing contest is “mainly an educational campaign,” adding that it won’t largely impact the coyote population.¹⁷

V. Killing coyotes harms sensitive ecosystems.

Coyotes are an integral part of healthy ecosystems, providing a number of free, natural ecological services.¹⁸ For example, coyotes help to control disease transmission by keeping rodent populations in check, curtailing hantavirus, a rodent-borne illness that kills humans. In addition, coyotes clean up carrion (animal carcasses), increase biodiversity, remove sick animals from the gene





pool, and disperse seeds. Coyotes balance their ecosystems and have trophic cascade effects such as indirectly protecting ground-nesting birds from smaller carnivores and increasing the biological diversity of plant and wildlife communities.¹⁹

VI. The Georgia Coyote Challenge will orphan dependent coyote pups and put non-target animals, including pets and threatened or endangered wildlife species, in peril.

The Coyote Challenge will orphan dependent coyote pups. Coyotes give birth in February and March, and they provision their pups in the spring and summer. They are particularly vulnerable at their den sites in March. Killing adult coyotes will leave dependent pups to die from thirst, starvation, predation or exposure.

In addition, the Coyote Challenge promotes the trapping of coyotes, an indiscriminate practice that captures animals regardless of age, sex and species, and often results in injury, pain, suffering or death of target and non-target animals—including companion animals and potentially even threatened and endangered wildlife. Body-gripping, restraining, and killing traps and snares are inhumane and the trapping and removal of wildlife, including target and non-target species, can be ecologically destructive. Nationwide, these traps and other similarly non-selective lethal control devices have unintentionally killed many pets, vertebrates of 150 species,²⁰ and thousands of mammals of at least 20 different taxa that are listed as threatened or endangered federally or in certain states.²¹ More than 80 countries and 7 states have banned or severely restricted use of steel-jaw leghold traps.²²

VII. Indiscriminate killing of coyotes will not reduce conflicts with humans, pets, or livestock.

Disrupting the coyote family structure by killing individual animals, including alpha animals, may actually increase conflicts. Exploited coyote populations tend to have younger, less experienced coyotes, increased numbers of yearlings reproducing, and larger litters. For adult coyotes with dependent young, the need to feed pups provides significant motivation for coyotes to switch from killing small and medium-sized prey to killing sheep.²³

Unregulated or open hunts do not target specific, problem-causing coyotes. Most killing contests target coyotes in woodlands and grasslands who are keeping to themselves—not coyotes who have become habituated to human food sources such as unsecured garbage, pet food, or livestock carcasses (left by humans).

Prevention—not lethal control—is the best method for minimizing conflicts with coyotes.²⁴ Eliminating access to easy food sources, such as bird seed and garbage, supervising dogs while outside, and keeping cats indoors reduces conflicts with pets and humans. Practicing good animal husbandry and using strategic nonlethal predator control methods to protect livestock (such as





electric fences, guard animals, and removing dead livestock) are more effective than lethal control in addressing coyote-human conflicts.²⁵

VIII. Claims that coyotes attack humans and pets and threaten livestock are greatly exaggerated.

The frequency and severity of coyote-human conflicts are often exaggerated to make coyotes a convenient scapegoat to justify killing them in large numbers.²⁶

Coyote attacks on humans are exceedingly rare. For instance, the New York State Department of Environmental Conservation points out that there are only a handful of coyote attacks on humans annually nationwide, while around 650 people are hospitalized and one person is killed by domestic dogs every year in New York State alone.²⁷

According to data from the United States Department of Agriculture, livestock losses to wild carnivores are minuscule. In 2010, U.S. cattle and sheep inventories numbered 99.6 million animals. Of that total, 467,100 cattle and sheep— or 0.5 percent of the inventory—were lost to all carnivores combined (including coyotes, domestic dogs, wolves, cougars, bobcats, vultures, and bears). The largest sources of mortality to livestock, by far, are disease, illness, birthing problems, and weather.²⁸

IX. Conclusion

Scientific evidence does not support the notion that indiscriminately killing coyotes through events such as the Georgia Coyote Challenge will diminish coyote populations, increase game populations, or reduce conflicts with people, pets, or livestock. Indeed, lethal control of coyotes may likely lead to more coyotes and more conflicts.

There is no noble purpose in killing contests. While bloodsports such as cockfighting and dogfighting have been condemned nationwide as barbaric and cruel, coyote killing contests are allowed to continue in Georgia. Killing animals for prizes is unethical and inconsistent with our current understanding of coyotes and of natural ecosystems. As we learn more about coyotes, and as the public's perception of the way animals should be treated continues to evolve, the general public will not tolerate activities that are viewed as unfair, unsporting, inhumane or unsustainable. Killing contests have no place in modern, science-based wildlife management.

Thank you for your consideration of this issue.

Sincerely,

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