



November 4, 2021

Nevada Board of Wildlife Commissioners
6980 Sierra Center Parkway, Suite 120
Reno, NV 89511

Subject: SUPPORT for Commission General Regulation 503, a rule to ban wildlife killing contests for predator and furbearing animals

Dear Madam Chair East and members of the Board,

On behalf of our Nevada supporters, volunteers, and staff, the undersigned organizations express our enthusiastic support for Commission General Regulation 503 to prohibit wildlife killing contests for predator and furbearing animals. We thank Commissioner McNinch and the Nevada Department of Wildlife for bringing forth this rule and the Commission for considering it. By passing this rule, the Commission would demonstrate its commitment to basing wildlife management decisions on ethics and science for the benefit of our wildlife, ecosystems, and all Nevadans.

The draft rule as written is a modest, sensible, and narrowly constructed regulation of hunting ethics that is in keeping with others the Commission passed in recent years. It simply prohibits competitions that involve the mass killing of animals for cash and prizes, but offers no further restrictions on the take of species covered.

The Public Trust Doctrine holds that wildlife in Nevada belongs to all Nevadans equally. A small share of Nevadans hunt (only 2.9 percent of Nevadans were paid hunting license holders in 2021)¹ and hunters enjoy relatively high public acceptance of hunting as it is commonly conceived. But the small portion of hunters who also participate in wildlife killing contests is on the fringe of that community and, according to a poll of Nevadans five years ago, the majority of Nevadans would prefer these contests be banned. Nevadans can support hunting as a tradition, but still establish restrictions on irresponsible practices. When it comes to wildlife, Nevadans—whether they live in urban, suburban or rural areas—do not support practices that they view as pointless, unsporting or wasteful. Wildlife killing contests are not rooted in tradition, have no subsistence or conservation purpose, and contravene longstanding principles of hunting ethics—namely, that wildlife may only be killed for a legitimate, nonfrivolous purpose; and that scientific management is the proper means for wildlife conservation.

Wildlife killing contests are an affront to the principles of scientific management in that they do not effectively manage wildlife populations, protect livestock, or boost populations of game species. In fact, we know that indiscriminate killing can *increase* coyote numbers and conflicts with livestock.²

Social science shows that most people have a strong connection to nature and care about the welfare of wild animals and their habitats. The Association of Fish & Wildlife Agencies and the Wildlife Management Institute recently noted that public attitudes about wildlife are shifting substantially in Western states and underscored the need to appeal to a broader constituency to ensure agencies remain influential in the future.³ The “America’s Wildlife Values: Nevada State Report” shows that a plurality of Nevadans hold “mutualist” values, defined as “believ(ing) wildlife are part of our social network and that we should live in harmony.”⁴ The share of mutualist values holders is double that of “traditionalists,” who “believe wildlife should be used and managed for human benefit.”⁵

Other studies, including the *Nature of Americans* report, have found that Americans express broad interest in nature, believe connecting with nature is important, and want to conserve wildlife species and their habitats.⁶ *This is true even for historically persecuted species.* A recent study by researchers at The Ohio State University found that between 1978 and 2014, the share of the public who held positive attitudes toward coyotes—the most frequent target of killing contests—grew by 47 percent, with the majority of respondents now expressing positive attitudes toward coyotes.⁷ It stands to reason that to hold a positive view of a given species is to also be concerned for their welfare.

The science and the significant public outrage against these events, which only continues to grow, cannot be ignored. For the aforementioned reasons, we respectfully urge the Commission to support as written General Regulation 503 to prohibit wildlife killing contests for predator and furbearing species.

Thank you for your service and for your consideration of this important issue.

Very respectfully,

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¹ The U.S. Fish and Wildlife Service: Historical Hunting License Data for 2020 at <https://www.fws.gov/wsfrprograms/Subpages/LicenseInfo/Hunting.htm>

² F. F. Knowlton, E. M. Gese, and M. M. Jaeger, "Coyote Depredation Control: An Interface between Biology and Management," *Journal of Range Management* 52, no. 5 (1999); Robert Crabtree and Jennifer Sheldon, "Coyotes and Canid Coexistence in Yellowstone," in *Carnivores in Ecosystems: The Yellowstone Experience*, ed. T. Clark et al. (New Haven [Conn.]: Yale University Press, 1999); J. M. Goodrich and S. W. Buskirk, "Control of Abundant Native

Vertebrates for Conservation of Endangered Species," *Conservation Biology* 9, no. 6 (1995); F. F. Knowlton, E. M. Gese, and M. M. Jaeger, "Coyote Depredation Control: An Interface between Biology and Management," *Journal of Range Management* 52, no. 5 (1999); B. R. Mitchell, M. M. Jaeger, and R. H. Barrett, "Coyote Depredation Management: Current Methods and Research Needs," *Wildlife Society Bulletin* 32, no. 4 (2004); Bishop, C. J., G. C. White, D. J. Freddy, B. E. Watkins, and T. R. Stephenson. 2009. Effect of Enhanced Nutrition on Mule Deer Population Rate of Change. *Wildlife Monographs*:1-28;

Hurley, M. A., J. W. Unsworth, P. Zager, M. Hebblewhite, E. O. Garton, D. M. Montgomery, J. R. Skalski, and C. L. Maycock. 2011. Demographic Response of Mule Deer to Experimental Reduction of Coyotes and Mountain Lions in Southeastern Idaho. *Wildlife Monographs*:1-33.; Forrester, T. D. and H. U. Wittmer. 2013. A review of the population dynamics of mule deer and black-tailed deer *Odocoileus hemionus* in North America. *Mammal Review* 43:292-308.; Monteith, K. L., V. C. Bleich, T. R. Stephenson, B. M. Pierce, M. M. Conner, J. G. Kie, and R. T. Bowyer. 2014. Life-history characteristics of mule deer: Effects of nutrition in a variable environment. *Wildlife Monographs* 186:1-62.

³ The Association of Fish & Wildlife Agencies and the Wildlife Management Institute: *The Fish and Wildlife Agency Relevance Roadmap (v1.0); Enhanced Conservation Through Broader Engagement*. September 2019 at https://www.fishwildlife.org/application/files/2515/7547/9977/Fish_Wildlife_Relevancy_Roadmap_Final_12-04-19-lowres.pdf

⁴ Dietsch, A.M., Don Carlos, A.W., Manfredo, M. J., Teel, T. L., & Sullivan, L. (2018). State report for Nevada from the research project entitled "America's Wildlife Values." Fort Collins, CO: Colorado State University, Department of Human Dimensions of Natural Resources.

⁵ *Id.*

⁶ Kellert, S.R., Case, D.J., Escher, D., Witter, D.J., Mikels-Carrasco, J., Seng, P.T. April 2017. The Nature of Americans: National Report. https://natureofamericans.org/sites/default/files/reports/Nature-of-Americans_National_Report_1.3_4-26-17.pdf

⁷ George, Kelly A., Kristina M. Slagle, Robyn S. Wilson, Steven J. Moeller and Jeremy T. Bruskotter. 2016. Changes in attitudes toward animals in the United States from 1978 to 2014. *Biological Conservation* 201:237-242. <http://www.sciencedirect.com/science/article/pii/S0006320716302774>