Transmitted Electronically

April 1, 2025

Senator Baldacci Representative Roberts Members of the Committee of Inland Fisheries and Wildlife Maine State Legislature

Re: In SUPPORT of LD 1293 - "An Act to Prohibit Coyote-killing Contests in Maine

Dear Senator Baldacci, Representative Roberts, and members of the Committee:

On behalf of our nearly 8,500 Maine members and supporters, we urge your support for LD 1293, which would prohibit coyote-killing contests in Maine.

In brief, the bill would make it a Class E crime to arrange, cause, hold, organize, plan, sponsor, provide a venue for, or to knowingly take part in a coyote-killing contest. It does not in any other way regulate the taking of coyotes. It simply prohibits contests to kill coyotes.

You should support LD 1293 because this bill:

- 1. Aligns with Traditional Principles of Ethical, Fair-chase Hunting.
- 2. Acknowledges Non-consumptive Values of Wildlife Species.
- 3. Ensures State Wildlife Management Policies Align with Best Available Science.
- 4. Recognizes Coyotes as Essential Components of Healthy Ecosystems Which Contribute to Human Well-Being.
- 5. Safeguards Federally Protected Wolves Which May be in the State and Could be Mistaken for Coyotes and Killed in These Contests.

In the following pages, we elaborate on each of the above five reasons for supporting LD 1293.

LD 1293 Aligns with Traditional Principles of Ethical, Fair-chase Hunting.

Maine's hunting heritage has long supported well-recognized principles of ethical, fair-chase hunting. Coyote-killing contests are antithetical to those principles because they turn coyote hunting and trapping into a blood sport for entertainment and prizes. Enacting LD 1293 will bring Maine wildlife management practices in line with these time-honored principles.

LD 1293 Acknowledges Non-consumptive Values of Wildlife Species.

There is increasing recognition among Americans of the non-consumptive value of wildlife, such as their intrinsic value, existence value and the ecosystem services they provide. Such values are diminished when wild animals are killed en masse through contests, derbies and tournaments. Killing contests also put non-target animals, companion animals, and people at risk. Killing contests perpetuate the wanton waste of wildlife, violate fair chase principles, and are considered unethical by many experts and the public at large.

LD 1293 Ensures State Wildlife Management Policies Align with Best Available Science.

Organizers and participants in coyote-killing contests frequently attempt to justify the events by asserting that contest hunts will reduce coyote numbers in the area. And that reduced coyote numbers will lead to fewer livestock-coyote conflicts and/or reduced killing of deer or elk which human hunters want to shoot themselves. Best available science, however, does not support these claims:

- Coyote populations self-regulate their numbers. Killing coyotes results in increased coyote numbers and higher coyote densities, because this species has evolved to compensate for high human-caused mortality by having more and larger litters, and because when coyote territories become vacant due to being hunted or trapped, coyotes from neighboring areas move in to fill the territory. Indiscriminate killing of wildlife, especially predators like coyotes, is ineffective as a population control method and can result in detrimental effects on individuals, populations, predator-prey dynamics, and ecosystems.²
- Killing coyotes does not decrease conflicts with livestock and may in fact exacerbate conflicts. There is no scientific basis to substantiate the claim that predator-killing contests decreases predations on livestock. In fact killing coyotes can increase the number of domestic livestock predated on by coyotes through (1) an increase in the number of surviving pups that must be fed by the pups' parents, and (2) dispersal of surviving pack members as transient individuals that may be more disposed to prey on livestock.³

• Killing coyotes does not result in reduced killing by coyotes of wild ungulates such as deer and elk. There is no scientific basis to substantiate the claim that predator-killing contests increase game populations.⁴

LD 1293 Recognizes Coyotes as Essential Components of Healthy Ecosystems Which Contribute to Human Well-Being.

Research has shown that apex predators, through their predation, competition, and cooperation can act as catalysts to structure ecosystems in ways that increase biodiversity and the complexity of food web interactions that are vital to maintaining ecosystem health, integrity and resilience.⁵

- For example, coyotes function as a keystone species in many different ecosystems; their removal can cause a 'release' or increase in intermediate "meso-predators" (e.g. skunks, foxes, feral cats) that can negatively impact ground nesting birds, amphibians, and smaller mammals. Additional effects can cascade through all trophic levels in the ecosystem and may cause changes to plant communities, soil fertility, and physical processes (e.g., erosion and stream geomorphology). Such wide-ranging impacts have been termed "trophic cascades" in the modern scientific literature. Thus, a reduction in the distribution and numbers of apex predators can have profound negative effects that contribute to ecological instability. Maintaining ecosystem health, integrity and resilience contributes to human well-being, as well.
- Many wildlife species, especially predators, have been shown to provide numerous ecosystem services that benefit humans. These include control of rodents and rabbits which compete with domestic livestock for forage, and which are associated with diseases including plague, hantavirus, tularemia and Lyme disease; and control of disease spread among wildlife species which could impact humans such as chronic wasting disease, brainworm and tuberculosis.⁶

LD 1293 Safeguards Federally Protected Wolves Which May be in the State and Could be Mistaken for Coyotes and Killed in These Contests.

Though wolves in Maine were eradicated by settlers by 1890, in modern times wolves have dispersed into Maine and other states in the Northeast from neighboring areas. Any wolves ranging in areas where coyote-killing contests take place in Maine will be at grave risk of harm or death. This risk exists not only due to the hunt occurring across a landscape where known dispersing wolves have been identified, but also due to the similarity in appearance between coyotes and wolves.

• Wolves are currently federally protected in most of their former range in the lower 48 United States, including in Maine. While the penalty for a Class E crime under state law is a misdemeanor punishable by up to six months in jail and up to a \$1,000 fine, the penalty for violating the Federal Endangered Species Act is even more severe. It includes

- criminal penalties of up to one year in prison and a fine of up to \$50,000, civil penalties of up to \$25,000, forfeiture of equipment and vehicles used to violate the Endangered Species Act, and confiscation of the illegally taken wildlife.
- Recent evidence of wolf dispersal into the region includes <u>canid scat that was confirmed</u> <u>via DNA analysis to be an Eastern/Algonquin wolf collected in northern Maine in 2019</u>, as well as a Great Lakes wolf killed and confirmed in New York in 2021.
- Since 1993 at least 11 wolves have been killed in northeast states and south of the St.
 Lawrence River. These include wolves killed in New York, Massachusetts, Vermont,
 Maine, New Brunswick and Quebec. Wolves killed outside of Maine were within easy dispersal range of Maine.
- Holding coyote-killing contests in Maine greatly increases the risk of wolves being killed by sportsmen claiming they thought the animal was a very large coyote. Coyote-killing contests frequently offer prizes for the largest coyote shot and/or the most coyotes shot. These inducements significantly increase the chances a wolf ranging within Maine will be shot and killed by someone mistaking the animal for a coyote and quick to pull the trigger because prize money or gifts are at stake. It is an indisputable fact that wolves can be mistaken for coyotes⁷ and that such mistaken identity kills have occurred.⁸
- Though wolves are generally larger than coyotes, the fact that hunting team participants in a coyote-killing contest may be competing to take the largest animal substantially increase the risk of a wolf being killed. The potential for any existing wolves to be taken during any coyote-killing contests in Maine in violation of the federal Endangered Species Act cannot be dismissed.
- As there is virtually no enforced regulation of take of coyotes and wolves nor
 population monitoring of these species in Maine and no reporting
 requirements for coyotes unless the animals are trapped, we don't know how
 many other wolf-like canids have gone undetected in this area. The virtually
 unregulated killing of eastern coyotes is likely resulting in wolves that are
 present within the region being killed.
- The fact that wolves are starting to return to Maine and neighboring states is an incredible conservation opportunity. The Maine Department of Inland Fisheries and Wildlife has acknowledged its significance by including the wolf in its draft 2025 State Wildlife Action Plan (SWAP) as a Species of Greatest Conservation Need (SGCN). It is necessary to ensure that activities like coyote-killing contests do not undermine the wolf's ability to persist and thrive once again in Maine. Passing LD 1293 and enacting it into law is a valuable step toward this objective.

Conclusion

Enacting LD 1293 will align Maine wildlife management practices statutorily with traditional Maine values of ethical, fair chase hunting of wildlife, appreciation for the ecological value of predators such as coyotes and safeguard any federally protected wolves which may be in the state. We urge you to pass LD 1293 out of committee.

Sincerely,

Amaroq Weiss, M.S., J.D.

Senior Wolf Advocate

Center for Biological Diversity

Amaro E. Wenz

ENDNOTES:

Animal Was a Wolf").

¹ Manfredo, M.J., Sullivan, L., Don Carlos, A.W., Dietsch, A.M., Teel, T.L., Bright, A.D., and J. Bruskotter. 2018. *America's Wildlife Values: The Social Context of Wildlife Management in the U.S.* National report from the research project entitled "America's Wildlife Values". Fort Collins, CO: Colorado State University, Department of Human dimensions of Natural resources.

⁵ O'Bryan, C.J., Braczkowski, A.R., Beyer, H.L., Carter, N.H., Watson, J.E.M., and E. McDonald-Madden. 2018. The contribution of predators and scavengers to human well-being. *Nature Ecology & Evolution* Vol 2:229-236; Brechtel, A., Gross, T., and B. Drossel. 2019. Far-ranging generalist top predators enhance the stability of metafoodwebs. *Scientific Reports* Vol 9:12268.

⁶ Levi, T., Kilpatrick, A.M., Mangel, M., and C.C. Wilmers. 2012. Deer, predators, and the emergence of Lyme disease. PNAS. July 3, 2012. Vol 109(27): 10942-10947; Hofmeester, T.R., Jansen, P.A., Wijnen, H.J., Coipan, E.C., Fonville, M., Prins, H.H.T., Spring, H., and S.E. van Wieren. 2017. Cascading effects of predator activity on tick-borne disease risk. *Proc. R. Soc. B* 284: 20170453; Tanner, E., White, A., Acevedo, P., Balseiro, A., Marcos, J., and C. Gortazar. 2019. Wolves contribute to disease control in a multi-host system. *Scientific Reports* 9: 7940.

⁷ State wildlife agencies in states with confirmed wolf populations often provide information to hunters to assist them in distinguishing between coyotes and wolves to avoid the killing of non-target animals, which could entail substantial penalties. *See*, *e.g.*, http://www.dfg.ca.gov/wildlife/nongame/wolf/

http://www.dfg.ca.gov/wildlife/nongame/wolf/FAQ.html;

http://wdfw.wa.gov/conservation/gray wolf/wolf information.html;

http://dnr.wi.gov/topic/wildlifehabitat/wolf/identify.html; http://dfw.state.or.us/Wolves/about_gray_wolves.asp

8 See, e.g., WolfPark.org./coyotes ("The coyote is often mistaken for the larger, bulkier wolf, especially when only glimpsed in fading light or behind foliage."); www.arizonahuntingtoday.com ("A 70-pound female wolf was shot and killed Jan. 25 by a coyote hunter in Roberts County."); Montana Fish, Wildlife & Parks (fwp.mt.gov/search) ("It is sometimes hard to tell the difference between wolves and coyotes, especially from a distance."); Michigan Wolf Management Plan (July 10, 2008) at 34 ("... in recent years, the coyote season has been closed in the UP and the northern LP during the November 15–30 firearm season to help prevent the killing of wolves misidentified as coyotes.") (available at http://www.michigan.gov/documents/dnr/Draft Wolf Management Plan

030708 227742 7.pdf); http://www.examiner.com/article/coyote-hunting-shutdown-north-carolina-after-endangered-wolves-shot-dead (news report of endangered red wolves killed late last fall during coyote hunt); and The Hays Daily News (Kansas) accessible at http://www.hdnews.net/Story/wolfkilled012913 ("DNA Tests Confirm

² Statement in Opposition to Wildlife Killing Contests Signed by more than 70 conservation scientists – January 13, 2021. https://projectcoyote.org/wp-content/uploads/2020/10/SAB-Letter-Against-WKCs_FINAL_2021.01.13.pdf
³ Id.

⁴ *Id*.