



CONSERVATION FORCE



To: Maine Department of Inland Fisheries and Wildlife
Attn: Becky Orff
 284 State Street
 Augusta, ME 04333

Re: Proposed Amendments to Chapter 16 – Hunting (Predator Hunting Contests);
 Proposed Amendments to Chapter 17 – Trapping (Coyote Trapping Season)

Position: Oppose

Date: October 5, 2020

Secretary Specialist Becky Orff,

We, the undersigned organizations, write to you today in opposition to the proposed amendments to *Chapter 16 – Hunting (Predator Hunting Contests)* and *Chapter 17 – Trapping (Coyote Trapping Season)* of the Maine Department of Inland Fisheries and Wildlife (MDIFW) Rules. For more than 80 years, sportsmen and women have been the primary funders of state-level conservation efforts¹ and are thus an important constituency that provides benefits for all Maine residents. The funding generated by sportsmen and women fuels the science-driven efforts of the MDIFW, which provides benefits for all wildlife species; these proposals are seeking to replace this process with an emotionally-driven plea. The proposed rulemakings to amend *Chapter 16* and *Chapter 17* serve no purpose other than to undermine coyote hunting

¹ *Maine: American System of Conservation Funding Fact Sheet*. Congressional Sportsmen’s Foundation. Accessed on September 16, 2020. Available online at: [http://congressionalsportsmen.org/uploads/page/2019 Maine ASCF Sheet.pdf](http://congressionalsportsmen.org/uploads/page/2019%20Maine%20ASCF%20Sheet.pdf).

opportunities, and outright eliminate predator hunting contests (or “tournaments”) and coyote trapping.

The amendments to *Chapter 16*, which intend to limit the open season and bag limits on coyotes, prohibit the taking of coyotes greater than or equal to 40 pounds, ban the use of bait while coyote hunting, and abolish coyote hunting contests, would unnecessarily and unjustly reduce opportunities for Maine’s sportsmen and women. Hunting contests are a well-regulated practice that requires participants to abide by the regular hunting laws. They offer the opportunity for sportsmen and women to form new relationships and bonds over a sense of alliance, all while working to combat the declining trend in hunting participation in Maine. As unnecessary as this proposal is, similarly restrictive amendments may be seen in the proposed rulemaking affecting coyote trapping. The amendments to *Chapter 17* are completely transparent with their intent; to bring about an effective end to all coyote trapping in Maine. Trapping is a critical element towards wildlife management efforts. Along with being highly regulated, it is a commonly accepted practice utilized by many wildlife research professionals. With these considerations in mind, we respectfully urge you oppose both rulemaking proposals, and in so doing, protect Maine’s science-based wildlife management practices and the hunting and trapping communities from these egregious affronts against their sporting heritages.

Proposed Amendments to Chapter 16 – Hunting (Predator Hunting Contests)

Contrary to the misinformed narrative that is often peddled by anti-sportsmen, parties to hunting tournaments, as you know, are not exempted from following the same honorable wildlife laws and regulations as other sporting pursuits – especially with regard to the hunting hours and the requirement for a Maine hunting license (and a coyote night hunting permit, when applicable). We remain staunchly supportive of the MDIFW’s ability to manage and regulate wildlife through the best available science; however, this proposed regulation banning hunting tournaments is in response to a resident’s emotionally-driven petition, which would undermine the scientific process and the efforts and expertise of the MDIFW.

As it currently stands, having no closed season on hunting coyotes in the daylight, in conjunction with there being no set bag limit, allows sportsmen and women the opportunity to spend more days afield, teaching others about our nation’s hunting heritage and further contributing to the American System of Conservation Funding. Should there be a need for an established season and/or bag limit, it is imperative that the decision be brought forth by the MDIFW after its own research and observations, and not through the efforts of citizen-science. Additionally, the needless bans on the use of bait while hunting for coyotes, and the prohibition on harvesting coyotes equal to or greater than 40 pounds, are direct and obvious efforts to curb the number of coyotes taken. The MDIFW is fully capable of making these determinations on its own behalf, and need not occur under the influence of a misguided petition.

Numerous accounts of conflicts between coyotes, humans, and their pets have been well-documented in the media within the region, and it stands to reason that the frequency of these occurrences is likely to increase if hunting opportunities are limited. Earlier this year, a Maine resident was forced to choke a coyote to death with his bare hands in New Hampshire after it attacked his child.² Over the years, incidents such as this can be found in the news throughout New England. Eliminating a potential management tool to deal with localized issues of overabundance and human-wildlife conflict is not in the best interest of the MDIFW, or public safety.

Hunting tournaments offer a heightened level of comradery and affability amongst the participants. In general, hunting often spawns a friendly, competitive environment between family and friends; however, tournaments offer the ability to challenge each other in a regulated environment, spurring a determination that often leads to lifetime memories and newly built relationships. During these events, competitors

² *NH Father Kills Coyote with Bare Hands After Attacks in 2 Towns*. CBS Boston. Accessed on September 16, 2020. Available online at: <https://boston.cbslocal.com/2020/01/20/coyote-killed-new-hampshire-father-kensington-exeter-attacks-rabies/>.

become friends, and friends become family. New methods and strategies are passed from one hunter to another, increasing the collective effectiveness and unity of the hunting community. Maine should be exploring ways to expand hunting opportunities throughout the state, not limiting them – and the consideration of such methods should be left under the sound jurisdiction of the MDIFW.

Proposed Amendments to Chapter 17 – Trapping (Coyote Trapping Season)

Trapping and regulated take are important components of modern wildlife management. The varying instruments used in this practice have all been rigorously evaluated for their efficiency, selectivity, practicality, safety, and animal welfare; and, are able to uniquely address a wide-breadth of wildlife management challenges in Maine. Extensive research on restraining traps has been conducted through annual appropriations from Congress to the Association of Fish and Wildlife Agencies. Since 1996, Best Management Practices (BMPs) have incorporated trapping methods developed from this research for fur-bearing species. All common trap designs have been field tested for each species and all captured animals were examined by veterinarians. State fish and wildlife agencies have adopted these BMPs through their regulatory processes to ensure that the most effective, selective, and humane technology is being used by their resident trappers. Trapping is a highly regulated activity, and the sportsmen’s community has supported both the vigorous enforcement of the relevant laws and the implementation of severe penalties for illegalities.

Regarding its role in conservation efforts from a general sense, trapping is a primary tool in wildlife damage management programs that involves the effective management of invasive species that cause extensive habitat degradation and threaten ecosystem health. Properly regulated and monitored traps can minimize potential for non-target capture and restore ecosystems to better support abundant native wildlife populations. Likewise, trapping is often utilized by professional wildlife managers as a useful research tool and for disease control. Therefore, efforts to potentially end coyote trapping in Maine undermine the ability of the MDIFW to effectively carry out its mission.

Closing

In consideration of the arguments mentioned above, we encourage the MDIFW to reject these rulemaking proposals. Fish and wildlife management decisions, such as this, must be left to the MDIFW – the body best equipped to make informed, science-backed decisions through the established regulatory framework – and cannot be left to petitions based off of misguided, emotionally-driven citizen-science. Sportsmen and women are the backbone for conservation funding, and their much-needed capital drives the efforts of the MDIFW. We encourage the MDIFW to explore ways to expand hunting and trapping pursuits, not limit them. These proposals’ attempts to undermine the MDIFW’s decision-making process are antithetical to the best interest of the citizens of the Pine Tree State and its natural resources.

Sincerely,

Congressional Sportsmen’s Foundation
Conservation Force
Dallas Safari Club
Dallas Safari Club Northeast, Inc.
Delta Waterfowl
Fur Takers of America
Furbearer Conservation
Houston Safari Club
Maine Professional Guides Association

Maine Sportsmen's Advisory Council
Maine Trappers Association
National Deer Alliance
National Rifle Association, Lauren LePage, Esq.
National Trappers Association
Professional Outfitters and Guides of America
Quality Deer Management Association
Safari Club International
Sportsman's Alliance of Maine
Sportsmen's Alliance