



May 27, 2021

Mr. John Daniel, II  
Chairman, Virginia Department of Wildlife Resources Board  
P.O. Box 90778  
Henrico, VA 23228

**Re: 4VAC15-20-260; Coyote and Furbearer Hunting Contests**

**Position: Oppose**

Dear Chairman Daniel and Members of the Virginia Department of Wildlife Resources Board,

On behalf of the Congressional Sportsmen's Foundation (CSF) and as a licensed Virginia hunter, I respectfully encourage you to oppose the proposed amendment that would make it unlawful for hunters to participate in coyote and furbearer hunting contests. Very few states have similar prohibitions, and we are concerned that the proposal would reduce opportunities for Virginia's sportsmen and women, decrease participation in hunting, and negatively impact conservation funding for the Virginia Department of Wildlife Resources (DWR).

Founded in 1989, CSF's mission is to work with Congress, governors, and state legislatures to protect and advance hunting, angling, recreational shooting, and trapping. CSF has a strong track record in Virginia, working with the Virginia Legislative Sportsmen's Caucus and conservation partners to protect and advance Virginia's sporting heritage by supporting pro-sportsmen legislation and state fish and wildlife management objectives. We offer the following comments based on our experience working on hunting issues for more than 30 years.

Hunting contests offer a heightened level of comradery and affability among 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 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. If the proposed regulation is adopted, these experiences would not be possible, and opportunities for Virginia's hunters

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would be reduced which is contrary to the DWR's Recruitment, Retention and Reactivation (R3) initiative which aims to increase participation in hunting.

For the past 30 years, participation in hunting has been declining in Virginia. In 1990, the U.S. Fish and Wildlife Service reported a total 848,860 certified paid license holders.<sup>1</sup> By 2020, that number decreased to 781,960.<sup>2</sup> Because the DWR relies heavily on funding generated by the sale of hunting licenses, the decline of hunters in Virginia poses a threat to the ability of the DWR to effectively carry out its mission. At a time when participation has been on a declining trend in Virginia (and across the country), we encourage the DWR to explore ways to expand hunting opportunities, not limit them.

In 2020, sportsmen and women in the Commonwealth generated \$63.66 million<sup>3</sup> through the “user pays – public benefits” American System of Conservation Funding to support the conservation efforts of the DWR. A portion of this revenue was generated through sportsmen and women pursuing coyotes and other predators, and in many cases, these hunters were participating in hunting tournaments. If the proposed amendment is adopted, sportsmen and women would be discouraged from hunting coyotes and other predators which in turn would not incentivize the sale of hunting licenses or firearms, ammunition, and other hunting-related goods that contribute to conservation funding for the state.

Moreover, we believe that this regulation is unneeded and instead recommend that the Board consider the following alternatives to address the DWR's stated concerns related to the optics of coyote and predator contests: (1) limit the number of hunters that may participate in a contest; (2) limit the number of contests held in the state per year, (3) establish a cap on the number of animals that can be harvested at each contest; and/or (4) require contest organizers to contract with tanneries and/or furriers to ensure that all animals harvested in these events are utilized consistent with the North American Model of Wildlife Conservation.

Additionally, we would submit that the proposed amendment is not going to significantly reduce the risk of further transmission or prevent additional introductions of *Echinococcus multilocularis* within the state. If the DWR has serious concerns about the tapeworm, we recommend that a separate, more targeted rule specific to the import and possession of coyotes and foxes, distinct from any regulation related to hunting contests, be developed with input from predator hunters and the trapping community. Similarly, Virginia has cervid import and possession rules to limit the spread of Chronic Wasting Disease that are not tied to whether the deer was harvested in a contest. If the proposed amendment is adopted as written, coyotes and foxes would still be allowed to be brought into the state creating confusion for Virginia's hunters and undermining the DWR's stated intent to minimize the spread of the tapeworm.

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<sup>1</sup> *National Hunting License Report*. U.S. Fish and Wildlife Service, 2004. Available online at: <https://www.fws.gov/wsfrprograms/Subpages/LicenseInfo/HuntingLicCertHistory.pdf>.

<sup>2</sup> *National Hunting License Data*. U.S. Fish and Wildlife Service, 2020. Available online at: <https://www.fws.gov/wsfrprograms/Subpages/LicenseInfo/Nat%20Hunting%20License%20Report%202020.pdf>.

<sup>3</sup> *Virginia: American System of Conservation Funding Fact Sheet*. Congressional Sportsmen's Foundation. Available online at: [https://congressionalsportsmen.org/uploads/page/Virginia\\_ASCF\\_Fact\\_Sheet\\_2021.pdf](https://congressionalsportsmen.org/uploads/page/Virginia_ASCF_Fact_Sheet_2021.pdf).

At a minimum, we strongly recommend that the Board amend the proposed regulation to provide a *de minimis* exception to clarify a maximum dollar amount for “other inducements of monetary value.” This would ensure, for example, that sportsmen and women in a hunt club can continue to host informal contests with their members. Based on the information presented by the DWR, the impetus for the proposed regulation is not small-scale tournaments, and thus we believe that clarification is needed to avoid negatively impacting local contests where the prize may be token with more symbolic than monetary, yet still prohibited, value.

COVID-19 has demonstrated a resurgence in hunting interest, and states across the nation reported sharp upticks in license sales and hunter education enrollment. Coyote and predator hunting contests help maintain interest in hunting by incentivizing participation and extended hunting opportunities following the conclusion of most big game seasons. It is our sincere hope that the DWR will focus on expanding access and opportunity for these new recruits to turn them into lifelong license purchasers, rather than actively working to decrease opportunities as this regulation would do.

In closing, we respectfully urge you to oppose the proposed regulation that would reduce opportunities for Virginia’s sportsmen and women and negatively impact conservation funding for the state. Thank you for considering our comments, and please let us know if you have questions or would like additional information.

Respectfully,



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