



13 September 2023

Oregon Department of Fish and Wildlife Commission
C/O ODFW.Commission@odfw.oregon.gov
4034 Fairview Industrial Drive SE
Salem, OR 97302

**Re: Contest Prohibition for Taking Unprotected Animals, Exhibit E
Sept 15, 2023 Commission Agenda**

Dear Chair Wahl, Commissioners and Director Melcher:

On behalf of Safari Club International, I would like to thank you for the opportunity to comment on the Contest Prohibition for Taking Unprotected Animals, Exhibit E on the upcoming Commission Agenda.

SCI opposes the provisions contained in the proposed rulemaking. As you are aware, the Commission does not have authority to regulate take of predatory animals and that is the reason the Commission had to deny the petition to regulate coyote hunting contests last year. This year, the Department, at the behest of the Commission, has presented a rulemaking that attempts to define contests as take and prohibit participation in contests. Again, as you are aware, take is defined as “means to kill or obtain possession or control of any wildlife.” A contest is not a means to kill, such as a bow or a rifle, nor does the contest obtain possession or control of any wildlife. Control and possession are done by individuals, not contests. It is a blatant attempt to distort the legal authority of the Commission to regulate something which it has no ability to do so. If the Legislature desired the Commission regulate hunting tournaments, it could simply change the law to allow that to occur.

Further, participants in hunting tournaments are subject to the same laws and regulations, such as methods of take or hunting hours, as those who don’t participate in hunting tournaments, contrary to misinformation presented by those opposed to the tournaments. Also, the tournaments or contests do not present a biological risk to the species as once again, the participants are constrained to the same bag limits as those who don’t participate in tournaments (despite misinformation presented by those opposed to the tournaments otherwise).

Because there is no discernable biological or legal difference between taking coyotes in tournaments and without tournaments, this proposal essentially just boils down to cancelling a segment of hunting that the proponents of the language do not like – cancel culture at its finest.

SCI believes that sound, science-based conservation utilizing hunting as the primary management tool, while maximizing opportunities for all huntable species, is necessary to the long-term health of wildlife. Hunters have long paid the way for conservation, for both game and non-game wildlife, and maximizing



opportunity for hunting is also key to long-term funding for all conservation. Hunting benefits wildlife conservation.

Thank you again for the opportunity to comment on the Contest Prohibition for Taking Unprotected Animals. SCI is dedicated to protecting the freedom to hunt and appreciates the continued partnership with the Commission and the Department. SCI is always first for hunters.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Laird Hamberlin". The signature is fluid and cursive, with a long horizontal stroke at the end.

W. Laird Hamberlin
CEO
Safari Club International