



49651 Shenandoah Circle
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March 9, 2016

Natural Resources Commission
c/o Cheryl Nelson, Assistant

Re: Opposition to Wildlife Conservation Order Amendment No. 4 of 2016 to expand coyote hunting

Via email: nelsonc@michigan.gov

Dear Chair Matonich and Commission Members:

Attorneys for Animals writes to express its opposition to Wildlife Conservation Order Amendment No. 4 of 2016, which proposes alarming regulations with regard to coyote and nighttime predator hunting. These regulations evince an intent by the Natural Resources Commission to wage an assault on Michigan coyotes, giving hunters a nearly endless toolbox of resources to kill coyotes that is at odds with statutory directives and with information provided to the Commission by the DNR.

Attorneys for Animals opposes the proposed amendments as unnecessary and violative of Michigan's Natural Resources and Environmental Protection Act, which mandates that the Natural Resources Commission use "principles of sound scientific wildlife management," as "wildlife populations of the state and their habitat are of paramount importance to the citizens" of Michigan. M.C.L. 324.40113a(a). The Natural Resources Commission is entrusted to conserve wildlife populations and promote only "wise use[s]" of such wildlife.

The proposed regulations, which, among other things, seek to expand year-round daytime hunting of coyotes, are unwise and needlessly threaten coyote populations. Under current regulations, hunters can engage in daytime hunting of coyotes nine months out of the year and can engage in nighttime hunting for four months of the year. By expanding daytime hunting year-round, and nighttime hunting by an additional five and a half months, the coyote population will be threatened, even during denning times.

With regard to the scientific basis for the proposed regulations, we note the following information provided to this Commission by the DNR's Furbearer Specialist in September 2015. His presentation:

- Acknowledged (as does the proposed Order) the current season is long, provides many hunting opportunities and has broad regulations to handle "nuisance" (DNR's quotation) animals
- Questioned efficacy of predator control: "habitat management efforts are more effective and economically viable ...when managing deer"

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- Noted that it was “difficult to assess” the coyote population
- Reviewed 4 options to “increase harvest,” with several caveats, including the statement that there is “[n]o indication that these options will result in a measurable impact on desired outcomes”
- Listed among the “potential” management needs the “increasing interest in predator harvest by deer hunters” who “desire reduction in deer mortality” and the desire to increase the deer population in the UP

Nonetheless, in January 2016, this Commission directed the DNR to expand the coyote season “based on information the NRC received over the past year regarding coyote management.” The Order now under consideration resulted.

We believe a fair interpretation of the facts leads to the conclusion that the NRC is bowing to hunting groups, some unnamed, and therefore the proposed regulations call into question the Natural Resources Commission’s ability in this instance to follow the Legislature’s clear directive that wildlife and their habitat be deemed of “paramount importance” in the state and that any proposed uses of our invaluable wildlife be “wise uses.”

Attorneys for Animals strongly urges the Natural Resources Commission to reconsider its proposed amendments.

Very truly yours,

ATTORNEYS FOR ANIMALS, INC.



By: Beatrice M. Friedlander, JD
Its President