

PROJECT COYOTE

F O S T E R I N G C O E X I S T E N C E



June 1, 2010

Florida Fish and Wildlife Conservation Commission
620 South Meridian Street
Tallahassee, FL 32399-1600

Sent via U.S. mail and email: Commissioners@MyFWC.com

RE: Proposed rule to regulate coyote/fox penning in Florida

Dear Chairman Barreto and Commissioners:

We, the undersigned scientists, wildlife biologists, veterinarians, and attorneys wish to thank the Florida Fish and Wildlife Conservation Commission (FWC) and its staff for its diligent work to address the controversial issue of coyote/fox penning enclosures in Florida. However, we firmly believe that the FWC needs to take a firm stand in banning this practice altogether. If the proposed rule is approved, the FWC will be legalizing a practice that runs counter to fundamental concepts of wildlife management and violates the principle of fair chase.

FWC's recent first-rate undercover investigation of penning operations that led to the arrest of 12 people and the issuance of 46 citations for various violations clearly shows how difficult- if not impossible- it will be to enforce rules on a practice that is inherently fraught with illicit and unethical behavior. Moreover, fox and coyote deaths can be easily concealed as past investigations have revealed. The demand for more coyotes and foxes will go unabated, creating an enticement to violate the regulations, and the serious threat of disease transmission will persist.

We, therefore, urge the Commission to reject the proposed rule and prohibit the penning of coyotes or foxes in Florida for the purpose of taking, killing, or harassing these animals by dogs or humans. We also urge you to ban the trade in coyotes and foxes for such purposes.

There are serious ethical, ecological, disease and health-related issues associated with penning. We strongly support a ban on this practice in Florida for the following reasons:

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INHUMANE: Capturing, transporting, marketing, and penning wild animals for dog training is inherently inhumane and should be banned for this reason alone. Pitting domestic canines (hounds bred and scored for their speed, persistence and aggression) against their wild cousins is ethically indefensible. This practice parallels dog- and cockfighting – activities made illegal in all U.S. states in the last twenty years, largely on ethical grounds. Moreover, exposure to repeated, prolonged and unavoidable pursuit results in chronic physiological stress and death. In addition to continual pursuit, animals used in penning operations are often kept in inhumane conditions without access to water or food. Most of these penned wild canids suffer and die- literally torn apart by the dog pack.

ECOLOGICALLY RECKLESS: Transporting and marketing wild coyotes and foxes for penning purposes are ecologically reckless. Inter- and intrastate trade and transportation of wildlife is one of the primary contributors to disease transmission and historically has led to the spread of rabies and other zoonotic diseases. The public safety threat of rabies alone should be cause enough to ban this practice; add costs and economic implications associated with its control and there is simply no justification for the continuation of penning.

Penning, and the associated trade in wild coyotes and foxes, has been linked to the introduction of the northern hydatid tapeworm, *Echinococcus multilocularis*, into places far removed from its natural boreal forest habitat. This tiny tapeworm, almost invisible to the naked eye, is well adapted to canids, wild and domestic, having its normal life cycle in them as fully reproductive, egg shedding worms (the infective eggs are in the canids' feces) and in the cyst-infested prey they normally kill and eat.

The infective eggs are normally consumed by future prey and are also picked up by grazing stock that become infected with cysts. It is also zoonotic, transmissible to humans, where its larval form, known as hydatid or alveolar cysts, is highly invasive and, in fact, potentially metastatic, like a cancer. The philosophical and ethical issues of live baiting/training notwithstanding, this environmental and public health issue is enough reason for a sensible policy to forbid the practice. Citing some of these health and ecological concerns, the Midwest Association of Fish and Wildlife Agencies passed a resolution in 2008 urging the adoption of state-by-state regulations prohibiting the importation or interstate movement of foxes and coyotes for the purpose of stocking coursing pens or for release and pursuit by hounds outside of coursing pens.

COUNTER TO SOUND SCIENTIFIC WILDLIFE MANAGEMENT: Coyote and fox penning is not an effective method of coyote and fox control as some proponents of the practice avow. As Dr. Stanley D. Gehrt, Assistant Professor of Wildlife Ecology for the School of Environment and Natural Resources at Ohio State University and lead researcher of the Cook County Coyote Research Study, stated in a letter to the Indiana Department of Natural Resources in support of a ban on this practice:

“The contention that the marketing of coyotes is necessary to control coyotes is not supported by any evidence. Throughout its range, the coyote has thrived with the least amount of protection afforded any game animal. This is particularly true in the Midwest, and sportsmen have been able to take this animal with little restrictions. Indeed, it is well demonstrated that even offering bounties (thereby increasing the economic value of the coyote) has never successfully altered coyote numbers over large areas. I don’t think it is consistent for management agencies to maintain that coyotes need little regulation while some trappers maintain that their activity (or business, in this case) is necessary for the control of coyotes. It is, therefore, misleading for proponents of the marketing of coyotes to suggest that their activities have any effect on coyote populations on a state-wide level. There is simply no evidence to support this.”

For these reasons, we strongly urge the Florida Fish and Wildlife Conservation Commission to prohibit the use of dogs to take, kill, or harass coyotes or foxes in confined areas and to ban trade in coyotes and foxes for such purposes.

Thank you for your consideration of our comments.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Camilla H. Fox". The signature is fluid and cursive, with the first name "Camilla" being more prominent than the last name "Fox".

Camilla H. Fox
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CC: Governor Charlie Crist (Charlie.Crist@MyFlorida.com)
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