

PROJECT COYOTE

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



Indiana Natural Resources Commission
Natural Resource Commission
100 N. Senate Ave., Rm N501
Indianapolis, IN 46204-2200

November 4, 2009

Sent via U.S. mail and email: jkane@nrc.in.gov; siensen@nrc.in.gov

RE: Support for proposals 09-074D & 09-073D to prohibit the taking, killing and harassment of coyotes and red foxes for “penning” purposes

Dear Commission Members:

We, the undersigned scientists, wildlife biologists, veterinarians, and attorneys strongly support Administrative Rule change proposals 09-074D and 09-073D. Administrative Rule 09-074D would render it illegal to take, kill or harass a coyote or red fox by use of a dog in Indiana while Administrative Rule proposal 09-073D would prohibit the use of dogs to take, kill, or harass coyotes or foxes in confined areas.

Current loopholes in Indiana’s wildlife regulations allow the capture and killing of coyotes and red foxes by dogs in the wild. Moreover, no rule or law exists prohibiting the trapping and selling of coyotes and foxes in state or across state lines to “penning” facilities where these wild canines are then used to “train” hunting dogs in “running pens;” this practice is allowed for five months of the year during the furbearer trapping season. Operators of the running pens often charge a fee for individuals to “train” their hunting dogs on the captive coyotes and foxes. As scientists, veterinarians, and attorneys, we believe this practice — commonly referred to as “penning” — violates the concept of “fair chase” hunting and runs counter to fundamental concepts of wildlife management. We concur with the Indiana Department of Natural Resources that there are serious ecological, ethical, disease and health related issues associated with penning. We strongly support a ban on this practice for the following reasons:

- **ETHICALLY INDEFENSIBLE:** 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.

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This practice parallels dog and cock-fighting – 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 may be 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 dangerous to wildlife, domestic animals and people. This practice has been linked to the introduction of the northern hydatid tapeworm, *Echinococcus multilocularis*, into places far removed from its natural habitat of the boreal forest of South Carolina. 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 INDNR 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.”

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For these reasons, we strongly support proposal 09-074D which would render it illegal to take, kill or harass a coyote or red fox by use of a dog in Indiana; and we strongly support proposal 09-073D which would prohibit the use of dogs to take, kill, or harass coyotes or foxes in confined areas. We urge the Indiana Department of Natural Resources Commission to adopt these two proposals.

Thank you for your consideration of our comments.

Respectfully submitted,



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