RE: Support for a ban on coyote/fox penning and trade in foxes and coyotes for the taking, killing and harassment of these animals in enclosures

Dear Chairman Barreto and Commissioners:

We, the undersigned scientists, wildlife biologists, veterinarians, and attorneys strongly urge the Florida Fish and Wildlife Conservation Commission (Commission) to prohibit the penning of coyotes and 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.

We wish to commend the Commission for its investigation of penning operations in the state which led to numerous arrests and citations, demonstrating the degree to which many of these penning facilities operate in flagrant violation of both moral and legal codes of conduct. We also commend the Commission for its recent decision to place a moratorium on the issuance of new penning permits and for directing staff to conduct a comprehensive statewide analysis on fox and coyote enclosure operations.

As scientists, wildlife biologists, veterinarians, and attorneys we believe this practice — commonly referred to as “penning” — violates the concept of fair chase and runs counter to fundamental concepts of wildlife management. There are also 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:

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. 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 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. This practice 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 enclosures and to ban trade in coyotes and foxes for such purposes.

Thank you for your consideration of our comments.

Respectfully submitted,

Camilla H. Fox, Masters, Wildlife Ecology, Policy & Conservation
Founding Director, Project Coyote
Wildlife Consultant, Animal Welfare Institute

CC: Governor Charlie Crist (Charlie.Crist@MyFlorida.com)
Mr. Nick Wiley, Executive Director, Florida Fish and Wildlife Conservation Commission (Nick.Wiley@myfwc.com)
Major Curtis Brown, Special Ops. Coordinator Florida Division of Law Enforcement (curtis.brown@myfwc.com)
Ms. Kathleen Hampton, Office of Executive Director (Kathleen.Hampton@MyFWC.com)
And on behalf of:

Marc Bekoff, PhD
Professor Emeritus, University of Colorado, Boulder
Advisory Board, Project Coyote
Boulder, CO

Toni Bianchi, CDBC, CPDT
Certified Dog Behavior Consultant
Positive Experience Training School, Inc.
Valparaiso, IN

Kevin Crooks, PhD
Associate Professor, Dept. of Fish, Wildlife, and Conservation Biology
Colorado State University
Fort Collins, CO

Kirk Cunningham, PhD
Conservation Chair
Sierra Club, Rocky Mountain Chapter, CO
Denver, CO

Chris Darimont, PhD
NSERC Postdoctoral Fellow
Wilmers Lab, Department of Environmental Studies
University of California, Santa Cruz
Santa Cruz, CA

Megan Draheim, MS, PhD candidate
George Mason University, Fairfax, VA
East Coast Consultant, Project Coyote
Washington, DC

Jacque Emel, PhD
Professor of Geography
Director of the Graduate School of Geography
Clark University
Worcester, MA

Veterinarian, Bioethicist and syndicated columnist
Advisory Board, Project Coyote
Minneapolis, MN

Steven J. Frech, DVM
Scandia Veterinary Clinic
Scandia, MN
Anja Heister, PhD Candidate
University of Montana
Missoula, MT

Rick A. Hopkins, PhD
Principal and Senior Predator Ecologist
Live Oak Associates, Inc.
San Jose, CA

Jean Hofve, DVM
Veterinarian
Denver, CO

Tom Huhnerkoch DVM, RN
Mountain Cats Trust
Lead, SD

Dale Jamieson, PhD
Director of Environmental Studies
Professor of Environmental Studies and Philosophy Affiliated Professor of Law Environmental Studies Program New York University
New York, NY

Connie L. Johnston, PhD candidate
Graduate School of Geography
Clark University, Worcester, MA

Rachael Jones, DVM
Southlane Veterinary Hospital
Valparaiso, IN

Christopher Keeley, DVM
Southlane Veterinary Hospital
Valparaiso, IN

Adam Lewandowski, MS
Wildlife Program Coordinator, CA Tahoe Conservancy
South Lake Tahoe, CA

Robert Long, PhD
Research Ecologist
Western Transportation Institute, Montana State University
Editor, Noninvasive Survey Methods for Carnivores
Ellensburg, WA

Malcolm R. MacPherson, PhD
Retired scientist
Santa Fe, New Mexico

D. Gordon Mott, MF
USFS Retired
Licensed Maine Forester
Lakeville ME
Joe Mueller, MS  
Professor of Biology and Field Ecology  
College of Marin  
Kentfield, CA

Sanjayan Muttulingam, PhD  
Research Affiliate  
Univ. of Montana, Department of Wildlife  
Missoula, MT

Michael P. Nelson, PhD  
Associate Professor of Environmental Ethics  
Lyman Briggs College, Department of Fisheries and Wildlife, and Department of Philosophy  
Michigan State University  
East Lansing, MI

Arnold Newman, PhD  
Executive Director, The International Society for the Preservation of the Tropical Rain Forest  
Sherman Oaks, CA

Laura M. Nirenberg, JD Candidate  
Founding Executive Director, Wildlife-Orphanage, Inc.  
LaPorte, IN

Reed F. Noss, PhD  
Davis-Shine Professor of Conservation Biology University of Central Florida Department of Biology  
Orlando, FL

Felicia B. Nutter, DVM, PhD, DACZM  
Wildlife Veterinarian and Epidemiologist  
Research Assistant Professor  
Tufts University Cummings School of Veterinary Medicine  
North Grafton, MA

Sherry L. Olson, PhD  
Volunteer Atmospheric Chemist  
National Center for Atmospheric Research  
Boulder, CO

Paul Paquet, PhD  
Senior Scientist Carnivore Specialist, Raincoast Conservation Foundation  
Advisory Board, Project Coyote  
Meacham, Saskatchewan

Chris Parsons, PhD  
Associate Professor, Department of Env. Science & Policy, George Mason Univ.  
Fairfax, VA

David Parsons, MS  
Wildlife Biologist, U.S. Fish and Wildlife Service – Retired  
Advisory Board, Project Coyote  
Albuquerque, NM
Walter L. Pepperman II, JD  
Attorney, Wildlife Advocate, & Registered Maine Guide  
Middletown Springs, VT

Richard P. Reading, PhD  
Associate Research Professor  
University of Denver  
Denver, CO

Kirk Robinson, JD, PhD  
Director, Western Wildlife Conservancy  
Salt Lake City, UT

Holmes Rolston, III, PhD  
Environmental ethicist  
Department of Philosophy  
Colorado State University  
Fort Collins, CO

Debbie Risberg, Wildlife Biologist  
Wildlife Programs Manager  
Animal Protection of New Mexico  
Albuquerque, NM

Nicole Rosmarino, PhD  
Wildlife Program Director  
WildEarth Guardians  
Denver, CO

Allen Rutberg, PhD  
Assistant Director, Tufts Center for Animals and Public Policy  
North Grafton, MA

Hope Ryden, Wildlife Biologist  
Author, God’s Dog: A Celebration of the North American Coyote  
New York, NY

Amelia Ryan, MS  
Biologist, Point Reyes Station  
Point Reyes, CA

D.J. Schubert  
Wildlife Biologist  
Animal Welfare Institute

Mona Seymour, PhD candidate  
University of Southern California  
Los Angeles, CA
Michael Soulé, PhD
Professor Emeritus, Environmental Studies, University of California, Santa Cruz
Past President and co-founder, Society for Conservation Biology
Advisory Board, Project Coyote
Paonia, CO

Elisabeth Stoddard, MS, PhD Candidate
Clark University
Worcester, MA

Stephen F. Stringham, PhD
Director, Bear Viewing Association
Soldotna, AK

Margaret Struhsacker, MS
Canid biologist - retired
Morrisville, VT

Jay Tischendorf, BSc, DVM
Veterinarian, Zoonotic disease expert
Director, American Ecological Research Institute (AERIE)
Great Falls, MT

John Toppenberg, Director
Alaska Wildlife Alliance
Anchorage, AK

Jay Tutchton, Esq. JD
General Counsel
WildEarth Guardians
Denver, CO

Geri Vistein, MA, MS
Conservation Biologist, Project Coyote
Belfast, ME

John A. Vucetich, PhD
Wildlife Biologist
Assistant Professor, School of Forest Resources and Env. Science
Michigan Technological Univ.
Houghton, MI

David Wade
Endangered Small Animal Conservation Fund
IUCN/SCC Small Carnivore Specialist Group member
Monmouth, IL

Paul Waldau, D. Phil., JD, MA
President, Religion and Animals Institute
Sherborn, MA

Jonathan G. Way, PhD
Eastern Coyote Research
Barnstable, MA
Bruce Wagman, Esq., JD  
Schiff Hardin LLP  
San Francisco, CA  

Amaroq Weiss, Esq. MS, JD  
Past Director of Western Species Conservation, Defenders of Wildlife  
Board of Directors, California Wolf Center  
Ashland, OR  

Larry Weiss, Esq. JD  
Retired attorney  
Denver, CO  

Lynne Williams, Esq. JD  
Environmental Attorney  
Bar Harbor, ME  

Dianne Wittner, Wildlife Biologist  
Alberta Institute for Wildlife Conservation  
Alberta, Canada  

Jennifer Wolch, PhD  
Dean, College of Environmental Design, UC Berkeley  
William W. Wurster Professor of City & Regional Planning  
Advisory Board, Project Coyote  
Berkeley, CA