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December 18, 2007

Robert E. Carter, Director
Indiana Department of Natural Resources
402 West Washington Street
Indianapolis, Indiana 46204

Re: Interstate Transportation and Sale of Live, Indiana Coyotes

Dear Director Carter:

On behalf of our nearly 160,000 constituents in Indiana, the Humane Society of the United States advocates a regulation banning the sale of live coyotes year-round for the following reasons:

I. Animal Welfare

Keeping live coyotes for the purpose of being sold to dog training facilities is inherently inhumane, and should be banned on this premise alone. Exposure to repeated, prolonged, and unavoidable pursuit results in chronic physiological stress, an associated detriment to health, and the possibility of death even with the presence of escape shelters.

Penned coyotes often meet a cruel end when torn apart by dog packs. No dog trainer can guarantee that a dog pack chasing its quarry can be prevented from attacking and killing the pursued animal. This blood sport bears a striking resemblance to dog fighting, which is illegal in all 50 states.

Additionally, as the recent 2-year investigations revealed, trapped coyotes sold into the live market endure cramped and inhumane long-distance transport.

II. Disease Transmission

Trapped, live coyotes are trafficked to many states; including some where penning is illegal, creating an immense disease threat. Studies have found that transporting live, wild animals for penning purposes has directly led to the spread of rabies, and other devastating diseases dangerous to wildlife, pets, and even people.

A study published in the *Journal of Wildlife Diseases* examining the disease presence found in captive wildlife kept for dog training enclosures concluded that the common practice of wild canid translocation for penning is "biologically hazardous."[1]

Under natural conditions coyotes tend to be solitary animals outside of the breeding season, thereby minimizing disease transmission between individuals. However, in the artificial conditions that are found in hound hunting and training enclosures, the risk of spreading these diseases between individuals of the same species or to the dogs and their handlers is greatly increased.

Organizations that have adopted a resolution in favor of increased restrictions or prohibitions on transporting wildlife for penning purposes include:

- National Association of Public Health Veterinarians
- American Veterinary Medical Association
- United States Animal Health Association
- Council of State Territorial Epidemiologists
- International Association of Fish and Wildlife Agencies
- Southeastern Association of Fish and Wildlife Agencies
- Southeastern Section of The Wildlife Society[2]

Additionally, three Indiana newspapers have written editorials encouraging the adoption of a year-round ban on the live sale of Indiana coyotes. These editorials, as well as an article that ran in the *Sullivan Times* by Outdoorsman Don Jordan, are enclosed.

In closing, we appreciate the Indiana Department of Natural Resources' willingness to address this most important issue. We support and encourage the Department to consider restricting live-sales year-round.

Sincerely,

Anne Sterling
Indiana State Director

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[1] Davidson, W.R. et al. 1992. Diseases and parasites of red foxes, gray foxes, and coyotes from commercial sources selling to fox-chasing enclosures. *Journal of Wildlife Diseases* 28(4): 581-589.
[2] Baker, O.E. 1998. Status of Fox and Coyote Hunting Enclosures in the Southeastern United States. *Proceedings of the fifty-second annual conference of the Southeastern Association of Fish and Wildlife Agencies* 52: 367-376.

Enclosures:
Indianapolis Star Editorial
South Bend Tribune Editorial
Gary Post Tribune Editorial
Sullivan Times Article

Cc:
Bryan Poynter, Chair, Natural Resources Commission
Glen Salmon, Director of Fish and Wildlife, Indiana DNR
Col. Michael Crider, Director, Law Enforcement, Indiana DNR

THE HUMANE SOCIETY
OF THE UNITED STATES

Testimony By: Anne Sterling

Presented To: The Natural Resources Commission

Regarding: Proposed Rule / LSA Document #7-749

Date: April 24th, 2008

Location: McCormick's Creek State Park

Thank you for the opportunity to comment. My name is Anne Sterling and I am the Indiana State Director of the Humane Society of the United States as well as a lifelong resident of Indiana.

The Humane Society of the United States is the nation's largest animal protection organization with more than 164,000 members and constituents in Indiana. On behalf of our more than 160,000 Indiana members I urge the Natural Resources Commission to pass proposed rule #7-749, which would prohibit the live sale of Indiana coyotes for 7 months of the year.

The practice of selling live, Indiana coyotes across state lines to be used in "live bait" training should be banned, year-round. There is ample evidence that this sordid practice not only spreads disease to wildlife in other areas, it does nothing to control a perceived overpopulation of coyotes, and is not supported by 'ethical' hunters or Indiana's neighboring states. Most importantly: this practice is inherently inhumane and should rightly be banned on this fact alone.

As the interstate sting operation in the fall of 2007 revealed, coyotes are trapped and shipped hundreds of miles in cramped cages with no access to food or water or ability to

move. When the animals reach their final destination they are released in an unfamiliar fenced territory and are forced to run for their lives, as packs of hunting dogs are set upon them.

This exposure to repeated, prolonged, and unavoidable pursuit results in chronic physiological stress, an associated detriment to health, and the possibility of death even with the presence of escape shelters. In addition to continual pursuit, coyotes kept for penning may be kept in inhumane conditions without access to water or food. Penned coyotes often meet a cruel end when torn apart by dog packs, leading to the constant demand for re-stocking of enclosures with fresh wildlife.

Since the Commission proposed the rule in mid-2007, it has received overwhelming public support. To date, 5 of the state's major newspapers have all editorialized not only in support of this modest measure to close our borders for 7 months of the year, but have called for the NRC to implement a year-round ban on the interstate trafficking in Indiana's wildlife.

Per Indiana Code 14-22-1-1, the wildlife of Indiana belong to all the people of Indiana, not just to the few who would profit from their sale and ultimate torture. Indiana's wildlife has no place in this sordid industry and the practice of selling Indiana's wildlife out of state to be used in cruel wildlife pens needs to be stopped year-round.

The Humane Society of the United States appreciates the NRC's focus on this important matter.

Anne Sterling
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