



December 10, 2014

To: Cape Cod National Seashore Superintendent George Price: george_price@nps.gov
Address: 99 Marconi Site Road, Wellfleet, MA 02667

Re: Predator/carnivore hunting within Cape Cod National Seashore

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Rebecca Mullin, Massachusetts Coyote Coalition Alliance
John Maguranis, Project Coyote – Massachusetts representative
Coalition of Scientists/Wildlife Biologists and other interested parties

Dear Superintendent Price, Cape Cod National Seashore, and the National Park Service:

We are writing to request that you ban carnivore/predator hunting within the lands of the Cape Cod National Seashore (CACO), and would be happy to meet with you and our science advisor(s) regarding the subject. Predator hunting involves killing carnivores, an ecologically

important group of mammals that science has shown help to maintain ecosystem health of natural communities. At CACO predatory species include eastern coyote (also called coywolf), red fox, river otter, and fisher, potential future populations of gray fox, bobcat, and black bear, and extirpated species including cougar and wolf.

We do not believe that killing carnivores for sport is consistent with the National Park Service (NPS) Organic Act (1916), in which the purpose of the NPS is articulated as follows: “to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations.” We understand that hunting was specifically addressed in the enabling legislation as a traditional use within the park, yet the EIS illustrated that traditional hunting practices focused on edible species including deer, duck, rabbit, and game birds. The [EIS](#) clearly states, however, that hunting of coyote, raccoon, and fox were conducted irregularly. It is only very recently that hunting effort on these species increased, in part because hunters believe that predators are competing for edible species. Through discussions with residents of the area and park employees, we know that people are increasingly and specifically targeting predators on the seashore, [especially eastern coyotes](#) (please note the two hyperlinks above), as a punitive measure. As such it is difficult to argue that predator hunting is an historical activity that was meant to be preserved through the enabling legislation as a traditional use within the park.

There is a wealth of data on the benefits of predators to ecosystems (see Science, 2011, 333: 301-306). Research on carnivores in national parks began with coyotes in Yellowstone in the 1930s and gray wolves in Denali in the 1940s; both provided insight into the valuable ecological role of carnivores and dispelled myths about their behavior. These studies ended predator control in national parks a long time ago. Massachusetts state law currently allows for long hunting seasons (October – March) on MA carnivores and controversial hunting-chase methods such as baiting, night hunting, no bag limits, and the use of dogs. We question that these are not traditional hunting methods, especially within a national park where citizens demand responsible stewardship of public lands. Without careful monitoring of predator populations, hunting of predators can easily become unsustainable (Journal of Applied Ecology, 2009, 46:1350-1356). And recent research casts doubt on the notion that tolerance for predators is enhanced by allowing people to kill them (Science, 2014, 344:476-477). Our national parks are a good place to reflect a more science-based and enlightened management of predators. In this vein, the [NPS in Alaska has worked for more than ten years to implement widespread and broader protections for predators on park service lands](#), even where subsistence and/or sport hunting is allowed, recognizing that predators are under increased pressure from hunting and that state laws do not adequately address their protection.

Our specific concerns with predator hunting in CACO are as follows:

a. High levels of human-caused mortality of top predators can jeopardize ecosystem health in several ways as smaller predators can become over-abundant (e.g., raccoons), herbivores can become over-abundant (e.g., rabbits, ungulates), disease risks can increase, and non-native species may invade more easily (Science, 2014, 343:6167, 1241484).

b. Randomly (e.g., through recreational hunting) killing carnivores, such as wild canids, does not reduce predation on domestic animals and pets (Wildlife Society Bulletin, 2005, 33:876–887; Wildlife Society Bulletin, 2003, 31:736-743; Wielgus & Peebles in press, PLOS ONE). Because the odds of increased complaints and livestock/pet depredations can increase dramatically with increased killing of carnivores, indiscriminate hunting is not an effective preventative and remedial method for reducing predator complaints and depredations (PLoS ONE, 2013, e79713:1-8). We believe that this would also apply to shorebird management at CACO where haphazard human hunting of carnivores will not prevent or reduce predation on shorebirds especially since little human hunting occurs on beaches.

c. Non-selective methods of killing coyotes can exacerbate conflicts with people, by removing non-culprits and leaving culprits in place or by altering social structure so that carnivore birthrates or pup survival increase, more dispersal occurs, packs break up, and younger animals search for food in human dominated areas (Journal of Range Management 1999, 52:398-412).

d. Recent discussions in professional journals have questioned the appropriateness of hunting predators in general (i.e., outside of national parks), especially for fun (sport) or for perceived losses of prey, and ultimately claimed that it is unethical (Oxford Handbooks Online, 2014, 1-15, DOI: 10.1093/oxfordhb/9780199927142.013.007). Those authors (p. 8) argued that predator hunting is not traditional, and when sustenance is not the central reason for hunting, its distinctive value is simply an act of killing, or worse, an opportunity to manifest hatred.

e. It has recently been discovered that heavily hunted wolves have higher stress and reproductive steroids/hormones than individuals with lower hunting pressure supporting the theory of social and physiological consequences to sentient animals, like canids, of human-caused mortality such as sport hunting. These authors noted that effects of stress are often subtle, but the resulting harm can be acute, chronic, and permanent, sometimes spanning generations.” (Functional Ecology, 2014, 1-10, doi: 10.1111/1365-2435.12354).

f. Perhaps most importantly, federal court decisions under the public trust doctrine require U.S. governments to act as trustees to manage wildlife sustainably for current and future generations including non-lethal uses (Science, 2011, 333:1828-1829). Given predator hunting is presently legal outside NPS lands, there are currently no federal public lands where people can visit in Massachusetts to see and appreciate un hunted predators and no areas where carnivores can avoid hunting related stressors.

Recently a [Carnivore Conservation Act \(CCA\)](#) was written for the state of Massachusetts. It is believed to be the nation’s first of its kind and intends to make carnivore management more egalitarian. The CCA shortens hunting seasons for the listed carnivore species and provides for

refuges (i.e., no hunting zones) on federal and state forests and parks, including CACO. These refuges will allow carnivores to evolve in response to natural selection instead of human-caused selection (which is the principal mortality agent for most carnivore species in MA and nationwide), and will allow carnivores to develop stable self-sustaining populations that can be studied. In addition to many other good reasons to provide refuge for CACO carnivores, there is evidence that mammalian carnivores may play a vital role in controlling small mammal (e.g., mice) reservoirs of many diseases, such as Lyme disease, that present serious and growing challenges to human health (see: *Northeastern Naturalist*, 2013, 20:655-665 & *Frontiers in Ecology and the Environment*, 2004, 2:13-20).

Also and as noted in the CCA, wildlife watching generates millions of dollars toward the MA economy and there is every indication that is the case at CACO. In Massachusetts in 2011, 1.8 million people spent \$1.3 Billion on wildlife associated recreation. That is 14.6 times more money and 32.6 more people than that spent on hunting in MA ([see page 4 of the MA survey](#)). In Yellowstone National Park, wolf watching annually generates an estimated \$35 million to the local economy (*Yellowstone Science*, 2008, 16:20-25). Contrary to the claims that hunting funds the lion's share of wildlife management, new research illustrates the significant contributions of wildlife watching, taxes, and other non-consumptive activities in wildlife management and conservation funding ([Wildlife Conservation & Management Funding in the U.S., Oct. 2014](#)).

It is due time to protect the most ecologically important species by implementing the best available science policies and proactively adopting the principles of the CCA, before legislators do. Banning carnivore hunting in the park is appropriate given the mission of the NPS to preserve resources unimpaired for future generations especially since there is no scientific support for any purported management purpose associated with predator hunting, and because killing park carnivores does not represent a historic traditional activity as required by the enabling legislation and instead appears to be a newer activity conducted to punish carnivores for fulfilling their evolved role in the wild.

We the undersigned support this measure:

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