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VIA ELECTRONIC AND CERTIFIED MAIL

Dan Ashe
Director
U.S. Fish and Wildlife Service
1849 C St. NW
Washington, DC 20240

Gary Frazer
Assistant Director for Endangered Species
U.S. Fish and Wildlife Service
1849 C St. NW
Washington, DC 20240

Mr. Leopoldo Miranda
Assistant Regional Director for Ecological Services
Southeast Regional Office
U.S. Fish and Wildlife Service
1875 Century Blvd, Ste 200
Atlanta, GA 30345

Cynthia Dohner
Regional Director
Southeast Regional Office
U.S. Fish and Wildlife Service
1875 Century Blvd, Ste 200
Atlanta, GA 30345

Re: Resolutions Regarding Red Wolf Recovery Program in North Carolina

Dear Director Ashe, Assistant Director Frazer, Mr. Miranda, Ms. Dohner:

We write to strongly support the continuation of the Red Wolf Recovery Program in eastern North Carolina and to oppose the recent resolutions passed by the North Carolina Wildlife Resources Commission (“Commission”) calling for the program’s termination.

The Red Wolf Recovery Program has been highly successful in reintroducing and maintaining the world’s only wild population of the critically endangered red wolf. The Commission’s resolutions — which call for the purposeful extinction of an endangered species in the wild — should not be given credence against the program’s demonstrated success. The Commission’s resolutions are misleading and inaccurate for the following reasons:

The Commission is calling for the extinction of an endangered species in the wild:

The Commission cannot dispute that a wild population of endangered red wolves is currently living and reproducing in the Red Wolf Recovery Area in Dare, Hyde, Tyrrell, Washington, and Beaufort counties on North Carolina’s Albemarle Peninsula (“Recovery Area”). The claim that there is no longer a “taxonomically unique red wolf” in the wild has been repeatedly discredited based on the best available science. The purpose of the Endangered Species Act (“ESA”) and the reintroduction program is to restore populations of endangered and threatened species to the wild. Declaring the red wolf to be extinct in the wild when a population of over 100 red wolves is being maintained in the Recovery Area is fundamentally at odds with the goal of species recovery in the wild.

The Commission's claims concerning the impacts of the Red Wolf Recovery Program are unsubstantiated:

The Commission has never substantiated its claims that the recovery program has caused significant impacts to landowners in the Recovery Area. Indeed, for the past three decades, landowners have actively cooperated with the U.S. Fish and Wildlife Service ("Service") in managing the red wolf program. Recent controversies about coyote hunting in the Recovery Area were precipitated by the Commission's own decision to authorize coyote hunting at night, despite concerns raised by the Service that coyote night hunting would endanger red wolves. Further, there is no evidence that coyote hunting restrictions designed to protect red wolves seriously hamper coyote control efforts. To the contrary, the Service's existing coyote sterilization efforts conducted in connection with the recovery program are likely to be more effective at controlling coyotes than the indiscriminate shooting of these animals.

Similarly, the Commission's suggestions that the recovery program is no longer viable are baseless. The Commission fails to mention that the Wildlife Management Institute's Comprehensive Review and Evaluation of the Red Wolf Recovery Program ("Comprehensive Review") concluded that the recovery program has been a viable success. The ESA does not limit endangered species recovery efforts to federal lands only and the fact that red wolves are living on private lands is simply not a legally justifiable basis for canceling the program. Not only are such claims legally baseless, they are also scientifically unsound. Furthermore, rendering the red wolf extinct in the wild because the Recovery Area may one day be inundated by sea level rise would set a terrible precedent for abandoning endangered species wherever climate change will eventually cause habitat degradation.

The Commission's assertions about hybridization have been repeatedly debunked:

While coyote-red wolf hybridization is an issue that merits ongoing attention, the best available science has demonstrated that the Service has successfully managed the issue in the Recovery Area through its Red Wolf Adaptive Management Plan, which includes active coyote sterilization efforts. Indeed, the Comprehensive Review concluded that the Service has successfully limited introgression of coyote genes into the wild red wolf population. Consequently, the Commission's refusal to issue a permit to allow coyote sterilization in the Recovery Area undermines red wolf recovery and is contrary to the goals of the ESA.

For these reasons, among others, we urge the Service to reject the Commission's resolution requesting that an endangered species on the path to recovery be made extinct in the wild and to reject the Commission's demands that red wolves be removed from private lands. In making its request to terminate red wolf recovery efforts, the Commission is going against the core purpose of the ESA, the best available science, and the wishes of more than 110,000 citizens who have spoken out in strong support of the red wolf throughout the program review process.

We look forward to working with the Service to ensure that the red wolf continues its recovery in eastern North Carolina.

Sincerely,

Cathy Liss
President
Animal Welfare Institute

Mike Senatore
Vice President, Conservation Law
Defenders of Wildlife

John Horning
Executive Director
WildEarth Guardians

Adam Roberts
Chief Executive Officer
Born Free USA

Leda Huta
Executive Director
Endangered Species Coalition

Kim Wheeler
Executive Director
Red Wolf Coalition

Noah Greenwald
Endangered Species Director
Center for Biological Diversity

Nancy Warren
Executive Director
National Wolfwatcher Coalition