



December 21, 2016

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RE: Comments on the Red Wolf's Five-Year Status Review (Docket No: FWS-R4-ES-2016-N161)

Dear Mr. Valenta:

Please accept the following comments on behalf of the Center for Biological Diversity ("Center") in response to the U.S. Fish and Wildlife Service's initiation of a five-year status review for the red wolf (*Canis rufus*) under the Endangered Species Act, 16 U.S.C. § 1531 *et seq.* ("ESA").¹

Once found abundant throughout the Southeast region to the Gulf coast, the red wolf has been reduced to a single, dwindling, wild population in North Carolina. Due to the Service's mismanagement of the red wolf program, it is estimated that fewer than 45 red wolves remain in the wild. The Center urges the Service, as part of the five-year status review, to take actions to redouble its recovery efforts to assist this highly imperiled species.

The Center for Biological Diversity is a non-profit environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental and administrative law. The Center has over one million members and online activists dedicated to the protection and restoration of endangered species and wild places. The Center has worked for over twenty-five years to protect imperiled plants and wildlife, open space, air and water quality, and overall quality of life. The Center has also worked extensively on saving the red wolf from extinction in the wild through legal, policy, and advocacy measures.

These comments reiterate discussion included in the Center's petition for a revised 10(j) rule, as well as its petition for a revised recovery plan. Those petitions are attached to this letter and should be included in the record for this status review.

¹ 81 Fed. Reg. 75425 (Oct. 31, 2016)

I. The Red Wolf Should Remain Protected Under the Endangered Species Act

A. The red wolf is a listable entity.

Any claim that the red wolf is not a unique species or not entitled to the protections of the ESA should be rejected. Numerous scientists have concluded that red wolves are genetically and morphologically distinct from gray wolves, and the only wolf species found solely in the United States.² The distinction of the red wolf as a full species (distinct from both *C. lupus* and *C. latrans*) has also been supported by most assessments of modern and fossil material, including some molecular studies.³

While some scholars have argued that the red wolf is a hybrid of the gray wolf (*C. lupus*) and coyote (*C. latrans*),⁴ the Service has already rejected attempts to delist the red wolf based on these genetic studies, finding that the evidence was inconclusive. Experts contracted by the Service also concluded that the red wolf is a listable entity under the ESA. Although the scientists differed on whether red wolves should be considered a distinct species, subspecies, distinct population segment, or admixture, they all agreed red wolves represent a unique lineage that is worthy of conservation.⁵

B. The red wolf is in danger of extinction throughout a significant portion of its range.

Once common throughout the eastern and south-central United States, most of the red wolf's populations were extirpated by the early 1900s due to predator control programs and habitat degradation. The species is classified as "critically endangered" by the International Union for Conservation of Nature (IUCN).⁶ In 1982, the Service designated an experimental population for the species under Section 10(j) of the Endangered Species Act.⁷

² Nowak, R. 2002. The Original Status of Wolves in Eastern North America. *Southeastern Naturalist* 1(2): 95-130, available at <http://redwolves.com/wp/wp-content/uploads/2016/01/Nowak-2002.pdf>; Brzeski, K.E., M.B. DeBiasse, D.R. Rabon Jr., M.J. Chamberlain, and S.S. Taylor. 2016. Mitochondrial DNA Variation in Southeastern Pre-Columbian Canids. *Journal of Heredity* 107(3): 287-93, <http://redwolves.com/wp/wp-content/uploads/2016/01/BRZESKI-2016-Pub.pdf>.

³ These studies are gathered in the attached Petition for Revised Recovery Plan (Dec. 8, 2016) (citing Atkins and Dillon 1971; Bertorelle and Excoffier 1998; Cronin 1993; Dowling et al. 1992a, 1992b; Elder and Hayden 1977; Freeman 1976; Gipson et al. 1974; Hall 1981; Hedrick et al. 2002; Jackson 1951; Kurten and Anderson 1980; Mech and Federoff 2002; Nowak 1992, 1995; Nowak and Federoff 1996, 1998; Nowak et al. 1995; Paradiso 1968; Phillips and Henry 1992). Such findings are also supported by 30 prominent scientists with expertise in ecology, genetics and other areas relevant to wolf conservation. See Scientist Letter to Dan Ashe (Nov. 30, 2016), http://www.biologicaldiversity.org/species/mammals/red_wolf/pdfs/Red_wolf_Scientist_ltr_FWS_proposals_11-30-16.pdf.

⁴ See, e.g., vonHoldt, B.M., J.A. Cahill, Z. Fan, I. Gronau, J. Robinson, J.P. Pollinger, B. Shapiro, J. Wall and R.K. Wayne. 2016. Whole-genome sequence analysis shows that two endemic species of North American wolf are admixtures of the coyote and gray wolf. *Science Advances* 2(7): e1501714, available at [10.1126/sciadv.1501714](https://doi.org/10.1126/sciadv.1501714)

⁵ U.S. Fish and Wildlife Service, Recommended Decisions in Response to Red Wolf Recovery Program Evaluation ("Sept. 2016 Recommended Decisions") at 2-3 (Sept. 12, 2016).

⁶ Kelly, B.T., Beyer, A. & Phillips, M.K. 2008. *Canis rufus*. The IUCN Red List of Threatened Species 2008: e.T3747A10057394. <http://dx.doi.org/10.2305/IUCN.UK.2008.RLTS.T3747A10057394.en> (downloaded on 20 December 2016).

⁷ 51 Fed. Reg. 26,564 (July 24, 1986); 50 C.F.R. § 17.81(a).

For its first 25 years, red wolf reintroduction was a considerable success, growing the wild population from to over 120 wolves by 2001 and peaking in 2006 with 130 wolves in 20 packs throughout the recovery area.⁸ For about the last decade, however, the red wolf in eastern North Carolina has been drastically declining. There were an estimated 74 individuals as of January 2015, and as of September 2016, the Service reported that the wild red wolf population consisted of 28 monitored individuals in five packs with only three known breeding pairs.⁹ The red wolf's populations have been decimated due to shootings and hybridization with coyotes. As a result, it is one of the world's most endangered mammals in existence, and immediate action must be taken to address the inadequacy of existing regulatory mechanisms and threats. Any wild wolves not falling within an experimental population designation must be classified as endangered.

C. The only remaining red wolves in the wild must be considered “essential” experimental populations.

Under the ESA, the Service must determine if an experimental population of reintroduced red wolves is “essential to the continued existence of an endangered species.”¹⁰ The consequences of designation as essential or nonessential are significant.¹¹ If the experimental population is deemed “essential,” the species is treated as “threatened” and can receive the full protection afforded by the ESA, including designation of critical habitat, and all agencies must consult with the Service under Section 7 of the ESA if an action may affect the experimental population.¹² In contrast, critical habitat cannot be designated for nonessential populations, and members are afforded full Section 7 protections only within the National Wildlife Refuge system and the National Park system.

Although the ESA does not define what is required for an experimental designation to be deemed “essential,” the Congressional intent is fairly clear: “The Secretary shall consider whether the loss of the experimental population would be likely to appreciably reduce the likelihood of survival of that species in the wild. If the Secretary determines that it would, the population will be considered essential to the continued survival of the species.”¹³ In other words, the relevant question here is whether survival of the red wolf in the wild would be reduced by loss of those wild wolves.

⁸ Faust, L.J., Simonis, J.S., Harrison, R., Waddell, W., Long, S. 2016. Red Wolf (*Canis rufus*) Population Viability Analysis – Report to U.S. Fish and Wildlife Service. Lincoln Park Zoo, Chicago; Hinton, J.W., G.C. White, D.R. Rabon, Jr., and M.J. Chamberlain. 2016a, *in press*. Survival and population size estimates of the critically endangered red wolf (*Canis rufus*); Phillips, M.K., V.G. Henry, and B.T. Kelly. 2003. Restoration of the red wolf. Pp. 272-288, In L.D. Mech and L. Boitani (Eds.). *Wolves, Behavior, Ecology, and Conservation*. University of Chicago Press, Chicago, Illinois, http://digitalcommons.unl.edu/cgi/viewcontent.cgi?article=1228&context=icwdm_usdanwrc; Hinton, J.W., M.J. Chamberlain, and D.R. Rabon, Jr. 2013. Red Wolf (*Canis rufus*) Recovery: A Review with Suggestions for Future Research. *Animals* 3: 722-44, available at <http://www.mdpi.com/2076-2615/3/3/722/pdf>.

⁹ Sept. 2016 Recommended Decisions

¹⁰ 16 U.S.C. § 1539(j)(2)(B)

¹¹ Parker, W.T., and M.K. Phillips. 1991. Application of the experimental population designation to recovery of endangered red wolves. *Wildlife Society Bulletin* 19: 73–79.

¹² 16 U.S.C. § 1539(j)(2)(C)

¹³ H.R. Conference Report No. 835 (quoted in Parker and Phillips 1991)

When the red wolf was reduced to captivity in 1980 — causing its extirpation in the wild — the experimental population at Alligator River National Wildlife Refuge should have been considered “essential” to the species’ existence because it was the only wild population in existence. That population remains the only wild population, so it must, by definition, be considered “essential.”

By deeming that wild population of red wolves as “nonessential,” the Service in effect has suggested that recovery of the red wolf in the wild is optional and that survival of the species in captivity is somehow sufficient. The Service has wrongly argued that a “nonessential” designation is appropriate because red wolf survival is ensured by the strong captive breeding program.¹⁴ But a captive breeding program is not sufficient to ensure “likelihood of survival of that species in the *wild*” and the ESA’s clear goal to achieve the recovery of listed species in the wild.¹⁵

Moreover, in captive-bred populations, artificial selection may promote traits that make the animal more successful in captivity but less successful in the wild. Wild populations, in contrast, are subject to natural evolutionary process that increase genetic diversity and help ensure that the wolf can survive and recover. Given the importance of these genetically unique wild wolves, the only remaining wild population must be deemed essential.

The Service was wrong when it designated the only wild red wolf population as a nonessential, experimental population. Because the recovery plan calls for at least three reintroduced populations, the next two experimental reintroduced populations — called for in the Recovery Plan and in the Center’s recent petitions — should similarly be identified as “essential.”

As such, we ask that the Service reclassify reintroduced populations as “essential,” consistent with the conservation purpose of the ESA.

II. The Service Is Failing Its Conservation Mandate To Protect The Red Wolf

Red wolf numbers began plummeting in the mid-2000’s when the state of North Carolina loosened regulations on coyote hunting that in turn increased the incidental take of red wolves.¹⁶ Rather than work to curb these shooting deaths, the Service in August of 2014 eliminated the red wolf recovery coordinator position without any legitimate rationale supporting the decision. It also ended its coyote sterilization efforts in early 2015, despite evidence that use of such “placeholder” coyotes reduced production of hybrid litters and thereby limited genetic introgression.¹⁷ It also stopped its public education and landowner outreach program-- two steps

¹⁴ Parker, W.T., and M.K. Phillips. 1991. Application of the experimental population designation to recovery of endangered red wolves. *Wildlife Society Bulletin* 19: 73–79.

¹⁵ H.R. Conf. Rep. No. 835 (emphasis added); *Trout Unlimited v. Lohn*, 559 F. 3d 946, 957 (9th Cir. 2009) (“the ESA’s primary goal is to preserve the ability of natural populations to survive in the wild.”)

¹⁶ Hinton, J.W., K.E. Brzeski, D.R. Rabon, Jr., and M.J. Chamberlain. 2015a. Effects of anthropogenic mortality on Critically Endangered red wolf *Canis rufus* breeding pairs: implications for red wolf recovery. *Oryx* 13: October 2015, <http://redwolves.com/wp/wp-content/uploads/2016/01/12-Hinton-et-al.-2015.pdf>.

¹⁷ Gese, E.M. and P.A. Terletzky. 2015. Using the “placeholder” concept to reduce genetic introgression of an endangered carnivore. *Biological Conservation* 192: 11-19, <http://redwolves.com/wp/wp-content/uploads/2016/01/14-Gese-and-Terletzky-2015.pdf>; Murray, D.L., G. Bastille-Rousseau, J.R. Adams and

determined critical to the program's success. Moreover, the Service has curtailed investigations and prosecutions of poaching and illegal shooting incidents even though at least 50 wolves have died, many due to suspected illegal take.¹⁸

Most recently, the Service has recommended removing wolves from the wild to "secure" the captive zoo population of wolves, even though scientists have clarified that the captive population does not need wolves from the wild population.¹⁹ The Service also wants to significantly scale back the red wolf's recovery area from five counties in North Carolina (totaling 1.7 million acres) to just Dare County, and forcibly remove red wolves at the whim of private landowners, risking significant disruption to breeding and pack dynamics.²⁰

This status review provides the Service a good opportunity to examine its previous management decisions and put the recovery program back on track.

III. The Service Needs to Publish a New 10(j) Rule That Better Protects the Red Wolf

A. A revised 10(j) rule that limits gunshot mortality is needed.

The Service has found that gunshot mortality is a "serious threat" to red wolves that is "hampering the ability of the red wolf" to recover.²¹ Gunshot mortality has "reduced the number of breeding pairs and pups" and "the population consequences of such mortality is highly limiting."²² From 2004 to 2012, the average annual number of gunshot-caused mortalities has increased approximately 375 percent when compared to 1988 to 2003.²³

By lowering the number of red wolves in the recovery area, gunshot mortality also potentially increases red wolf inbreeding and promotes red wolf hybridization with coyotes.²⁴ Bohling and Waits (2015) found that over half of the observed wolf-coyote hybridization events followed the disruption of a stable breeding pair of red wolves due to mortality of one or both breeders, and that humans caused 69 percent of these deaths, primarily through gunshot mortality prior to the

L.P. Waits. 2015. The challenges of red wolf recovery conservation and the fate of an endangered species recovery program. *Conservation Letters* 8: 338-344, available at <http://redwolves.com/wp/wp-content/uploads/2016/01/26a-Murray-et-al.-2015.pdf>.

¹⁸ Red Wolf Mortality Table (June 13, 2016), available at <https://www.fws.gov/redwolf/Images/Mortalitytable.pdf>.

¹⁹ Faust, L.J., J.S. Simonis, W. Waddell, and S. Long. 2016. Letter to FWS dated October 11, 2016, <https://www.defenders.org/publications/PVA-Team-response-to-USFWS-10-12-16.pdf>

²⁰ Sept. 2016 Recommended Decisions at 7-8; U.S. Fish and Wildlife, FAQ: Red Wolf Recovery Program Review (Sept. 12, 2016), <https://www.fws.gov/redwolf/docs/red-wolf-announcement-faq-september-2016.pdf>.

²¹ U.S. Fish and Wildlife Service. 2007. Red Wolf (*Canis rufus*) 5-Year Status Review:

Summary and Evaluation, available at http://ecos.fws.gov/docs/five_year_review/doc3991.pdf, p. 28

²² *Id.* at 29.

²³ Bartel, R.A., and D.R. Rabon, Jr. 2013. Re-introduction and recovery of the red wolf (*Canis rufus*) in the southeastern USA. Pages 107–115 in P. Soorae, editor. *Global re-introduction perspectives*. IUCN, Gland, Switzerland, <http://redwolves.com/wp/wp-content/uploads/2016/01/4-Bartel-and-Rabon-2013.pdf>

²⁴ Kelly, B.T. and M.K. Phillips. 2000. Red wolf, http://tesf.org/wordpress/wp-content/uploads/2014/02/kelly-phillips_-2000.pdf at p. 249-51; Hinton, J.W., K.E. Brzeski, D.R. Rabon, Jr., and M.J. Chamberlain. 2015a. Effects of anthropogenic mortality on Critically Endangered red wolf *Canis rufus* breeding pairs: implications for red wolf recovery. *Oryx* 13: October 2015, <http://redwolves.com/wp/wp-content/uploads/2016/01/12-Hinton-et-al.-2015.pdf>; Way, J.G. 2014. Strategies for red wolf recovery and management. *Canid Biology and Conservation* 17: 9-15, <http://redwolves.com/wp/wp-content/uploads/2016/01/35-Way-2014.pdf>.

red wolf breeding season. The scientists conclude that disruption of stable breeding pairs of red wolves facilitates hybridization, jeopardizing future recovery of the red wolf.

The current 10(j) rule is the product of amendments in 1995 that liberalized the legal shooting of wolves and has driven much of the gunshot mortality.²⁵

One of the most problematic exceptions to the prohibition on take of red wolves is that “[a]ny person may take red wolves found on private land” if “such taking is not intentional or willful.”²⁶ Anyone can say they mistakenly killed a red wolf by claiming that they believed it was a coyote — and thereby fall within this exception.²⁷ This permissive allowance of lethal take gives a wink-and-a-nod to anyone that wants to kill a red wolf.²⁸

The current 10(j) rule also allows private landowners or their agents to kill wolves “in the act of killing livestock or pets.”²⁹ While the Service has stated that providing tools for private landowners to defend domestic animals may help build landowners’ tolerance for wolves on their property, allowing landowners to *kill* such offending wolves is too severe given the dire status of the wild population of red wolves.³⁰

Another problematic aspect of the current 10(j) rule is that it exempts any take on public land that is “incidental to lawful activities, is unavoidable, unintentional, and not exhibiting a lack of reasonable due care.”³¹ With the population of wild red wolves reduced to as few as 45 animals, such a broad authorization for incidental take is unwarranted.

The current 10(j) rule also provides that private landowners may kill wolves if federal attempts to “capture such animals have been abandoned.” 50 C.F.R. 17.84(c)(4)(v). This exception has led to private landowners killing even non-offending wolves that disperse onto private land, if the Service refuses to take action to capture them. Indeed, experience has shown that this exception has led to a high demand for wolf killings, as the Service has received hundreds of requests from private landowners for removal of wolves and for authorization to kill wolves.

²⁵ 60 Fed. Reg. 18940 (April 13, 1995)

²⁶ 50 C.F.R. § 17.84(c)(4)(i)

²⁷ Recognizing the impact of red wolf shootings based on mistaken identification, the U.S. District Court for the District of North Carolina preliminarily enjoined coyote hunting in the Red Wolf Recovery Area in May 2014 after six red wolves were shot to death in the fall of 2013. *Red Wolf Coal. v. N.C. Wildlife Res. Comm’n*, No. 2:13-CV-60-BO, 2014 U.S. Dist. LEXIS 65601 (E.D.N.C. May 13, 2014). That court order led to a settlement that prohibits night hunting of coyotes in the recovery area and other red wolf protections.

²⁸ Newsome, T.M., J.T. Bruskotter, W. J. Ripple. 2015. When Shooting a Coyote Kills a Wolf: Mistaken identity or misguided management? *Biodivers. Conserv.* 1-5, https://thomasnewsome.files.wordpress.com/2013/09/newsome_et_al_biodcon_2015.pdf.

²⁹ 50 C.F.R. § 17.84(c)(4)(iii)

³⁰ Chapron, G., and A. Treves. 2016. Blood does not buy goodwill: allowing culling increases poaching of a large carnivore. *Proceedings of the Royal Society of Britain* 283: 20152939, https://www.biologicaldiversity.org/campaigns/gray_wolves/pdfs/Treves_and_Chapron_Allowing_culling_increases_poaching_of_a_large_carnivore_2016.pdf.

³¹ 50 C.F.R. 17.84(c)(4)(ii)

As requested in the Center's emergency petition for a new 10(j) rule, the Service should propose a new 10(j) rule aimed at reduction of red wolf mortality.³²

B. The red wolf's recovery area needs to be expanded, not decreased.

The Center strongly objects to the Service's recommended decision to propose a new 10(j) rule that would limit the current Red Wolf Recovery Area to federal lands in Dare County, which is less than 10 percent of the approximately 6,000 km² currently occupied by the species. Restricting the recovery area would undo decades of successful red wolf conservation work. A one-county area cannot maintain a viable population of red wolves and would likely condemn the wolf to extinction in the wild in North Carolina.

While we support the Service's decision to identify additional sites beyond the recovery area in North Carolina, it will take years to build new recovery programs and public support for wild wolves in other locations. In the meantime, the Service must continue investing in the recovery effort in North Carolina. This means wolves should be allowed to establish additional territories in the North Carolina reintroduction area so that population growth might once again continue.

C. More re-introductions are needed for red wolf recovery.

Section 10(j) of the ESA provides that the Service may introduce experimental populations of threatened and endangered species back into the wild in their historic range where they are extirpated.³³ According to the 1990 Recovery Plan, there should be at least 220 wolves in three wild populations.³⁴

There are many reasons why reintroduction into additional sites is necessary for red wolf survival and recovery. First, a greater number of reintroduction sites allows for the eventual establishment of a healthy metapopulation, featuring interactions between populations to achieve the necessary exchange of genetic material critical to species restoration. Increased genetic diversity from additional reintroductions will further act to mitigate inbreeding depression associated with small isolated populations.³⁵

Expansion of the reintroduction program is also of critical importance to the management of disease.³⁶ With only one wild red wolf population, disease has the potential to spread and wipe out that population. The establishment of at least two more reintroduction sites within red wolf

³² Center for Biological Diversity, et. al., Emergency 10(j) Petition to Protect the Red Wolf (May 24, 2016);

³³ 16 U.S.C. § 1539(j)

³⁴ U.S. Fish and Wildlife Service, Red Wolf Recovery/Species Survival Plan (Oct. 26, 1990) ("1990 Recovery Plan").

³⁵ Brzeski, K.E., D.R. Rabon Jr., M.J. Chamberlain, L.P. Waits, and S.S. Taylor. 2014. Inbreeding and inbreeding depression in endangered red wolves (*Canis rufus*). *Molecular Ecology* 23: 4241–4255, http://redwolves.com/wp/wp-content/uploads/2016/01/1-Brzeski-et-al.-2014_Mol.-Ecol._Inbreeding-and-inbreeding-depression-in-red-wolves.pdf; USFWS 2007, p. 10

³⁶ Brzeski, K.E., R.B. Harrison, W.T. Waddell, K.N. Wolf, D.R. Rabon Jr., and S.S. Taylor. 2015. Infectious disease and red wolf conservation: assessment of disease occurrence and associated risks. *Journal of Mammalogy* 96: 751-761, http://redwolves.com/wp/wp-content/uploads/2016/01/2-Brzeski-et-al.-2015_J.-Mammal._Red-wolf-disease-conservation.pdf

historic range could partly alleviate disease risk.³⁷ Furthermore, expanding recovery efforts across the red wolf's historic range will facilitate evolutionary processes, such as natural selection, that are needed to promote adaptation and population persistence in anthropogenic landscapes.³⁸

For these reasons, the Center's petition for a revised 10(j) rule, as well as its petition for a revised recovery plan, call for additional red wolf reintroduction sites. In addition, three to four captive-bred, zoo-managed red wolves should be released into the wild per year to retain genetic diversity.³⁹

IV. A Revised Recovery Plan Is Needed To Guide Future Management Actions

On December 8, 2015, the Center and its allies coauthored a petition requesting for a revised red wolf recovery plan that would ensure the Service utilizes the best available science and complies with the Endangered Species Act.⁴⁰ The petition includes information about threats to the red wolf and strategies the Service could use to address those threats. The petitioners advocate that the revised plan should:

- reduce lethal and nonlethal removals of wolves from the wild population;
- resume the use of the “placeholder program” (which releases sterilized coyotes to hold territories until red wolves move into the territory or are reintroduced) to diminish coyote-wolf gene introgression;
- resume the use of the cross-pup fostering program as a way to increase the genetic diversity of the species;
- utilize additional reintroduction sites to increase population size and expand wolf range; and
- use outreach and education to garner support for wolves and end killings of red wolves.

Again, the petition for a revised recovery plan is attached to this letter and should be included in the record for the agency's decisionmaking on the future of the red wolf. As part of the status review, please consider the need for a revised red wolf recovery plan.

³⁷ Bartel, R.A., and D.R. Rabon, Jr. 2013. Re-introduction and recovery of the red wolf (*Canis rufus*) in the southeastern USA. Pages 107–115 in P. Soorae, editor. Global re-introduction perspectives. IUCN, Gland, Switzerland, <http://redwolves.com/wp/wp-content/uploads/2016/01/4-Bartel-and-Rabon-2013.pdf>

³⁸ *Id.*

³⁹ Faust, et. al., Red Wolf Population Viability Analysis: Final Report for U.S. Fish and Wildlife Service Feasibility Study (“PVA Study”) at 21-28 (June 10 2016); Scientist Letter in Support of Red Wolf Recovery (Nov. 30, 2016), available at http://www.biologicaldiversity.org/news/press_releases/2016/red-wolf-11-30-2016.html; Wildlife Management Institute, A Comprehensive Review and Evaluation of the Red Wolf Recovery Program at 3 (Nov. 14, 2014) (“WMI Report”).

⁴⁰ Center for Biological Diversity, et. al. Petition for Recovery Plan (Dec. 8, 2016).

V. The Service Has Ignored The Broad Support For The Red Wolf Recovery Program

By its own admission, the Service has considered socio-political factors “just as important, if not more important than ecological factors.”⁴¹ As a result, the Service has maintained that private landowner support is essential to continue the existing recovery program in North Carolina, and an internal memo recommended the proposal of a 10(j) rule which would maximize private landowner incentives and exemptions.⁴²

Wild red wolves provide tourism opportunities that support rural North Carolina communities.⁴³ In addition, red wolves are a part of the natural heritage of the Southeast, which has been driven toward extinction because of human activities. For these reasons and more, most of the public values wild red wolves. To be sure, in addition to more than 110,000 comments submitted to the Service from national supporters of the program in 2014, a petition representing 1538 North Carolina residents, 100 of whom resides within the five county recovery area, was submitted to the Service in 2016.⁴⁴ Most recently, half a million people urged the agency not to abandon the species.⁴⁵

While the Center agrees that socio-political factors do play a significant factor in conservation, the Service has disproportionately bowed to the will of a minority of vocal, anti-wolf interests in North Carolina. Rather than embrace those who wish to see red wolf recovery program fail, the Service must invest in resources to build local stakeholder support for the program.⁴⁶

VI. Conclusion

The red wolf recovery program was once the model of success for carnivore recovery efforts in the United States. Despite the efforts of dedicated on-the-ground staff, poor decision-making under the leadership of Dan Ashe and the Service’s Southeast Regional Office has caused this program to disintegrate. But it is not too late to save the red wolf from extinction in the wild. As part of this status review, the Center urges the Service to grant our petitions for a new, stronger, 10(j) rule and updated recovery plan. The Service must promptly identify additional recovery sites, resume releases of captive wolves into the current recovery area, and undertake actions to limit mortality in the wild population.

⁴¹ Sept. 2016 Recommended Decisions at 4; PVA Scientist Team Response Letter (Oct. 12, 2016)

⁴² Cynthia Dohner, Information Memorandum for the Director (Feb. 24, 2016).

⁴³ Defenders of Wildlife. 2005. Red Wolves: Creating Economic Opportunity Through Ecotourism in Rural North Carolina,

https://www.defenders.org/publications/red_wolves_creating_economic_opportunity_through_ecotourism_in_rural_north_carolina.pdf

⁴⁴ See Center for Biological Diversity Press Release (Jan. 26, 2016), available at https://www.biologicaldiversity.org/news/press_releases/2016/red-wolf-01-26-2016.html; <http://thetruthaboutredwolves.com/doc/ResponsetoOct7PRnumbers.pdf>.

⁴⁵ See Center for Biological Diversity Press Release (July 13, 2016), available at https://www.biologicaldiversity.org/news/press_releases/2016/red-wolf-07-13-2016.html.

⁴⁶ WMI Report at 4-5.

Respectfully submitted,



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Enclosures:

- Center for Biological Diversity, et. al., Emergency 10(j) Petition to Protect the Red Wolf (May 24, 2016)
- PVA Scientist Team Response Letter (Oct. 12, 2016)
- Scientist Letter to Dan Ashe (Nov. 30, 2016)
- Center for Biological Diversity, et. al. Petition for Recovery Plan (Dec. 8, 2016)
- Center for Biological Diversity Letter to Dan Ashe Re: Concerns About Sept. 2016 Recommendations (Dec. 9, 2016)
- Congressional Letter in Support of Red Wolf Recovery (Dec. 7, 2016)