



### **A Guide to Preparing Your Comments Regarding the New Red Wolf Rules**

Thanks as always for your support of red wolves. The information below is intended to help you prepare your comment letter regarding the U.S. Fish and Wildlife Service (USFWS) Environmental Impact Statement that will ultimately determine the management of red wolves and red wolf habitat.

*Our advice is to make this letter your own.* These guidelines are provided only to help organize your thoughts. We highly recommend that your letter reflect your interest in, and knowledge of, red wolves. The USFWS will place a premium on informed, sincere letters clearly written by individuals, and will generally disregard “spam” letters that merely repeat generic information.

**Please remember that your comment letter must be delivered to the USFWS headquarters in Washington DC no later than Monday, 24 July 2017.**

Commenters may want to consider a letter organized in three sections:

1. **The Personal** - Please let USFWS know why you are interested in red wolves. Why do they matter to you? When/How did you become interested in red wolves? What is your “red wolf story?”
2. **The Ethical** – Why are humans and, by extension, the USFWS obligated to protect this species? Why is it important that USFWS do all it can to protect red wolves? What must we do for wolves?
3. **The Plan** – What actions do you suggest the USFWS take to ensure the best management of red wolves? What issues must USFWS consider in deciding how to protect and preserve red wolves into the future?

Below (and in no particular order) are some of the issues the Red Wolf Coalition will raise in its organizational letter to USFWS. Please feel free to use these as a starting point, though, again, be sure to frame your letter using your own thoughts and words.

- The Red Wolf Recovery Program in northeastern North Carolina should be limited to a yet-to-be-determined area encompassing both federal land and private land owned by entities fully cooperating in red wolf management activities. All parties involved with red wolf management must accept that it is important and realistic to permanently preserve a viable and fully protected representative population of red wolves within a geographical range that would not strain resources and/or intensify threats of both hybridization and human conflict.

- The USFWS and its partners in management must clearly and continuously acknowledge that, even within the appropriate ongoing debate among scientists about the evolutionary origins of the red wolf, the fact remains that the red wolf is a legitimate species for purposes of the Endangered Species Act (ESA).
- The USFWS must discontinue its designation of the red wolf as *experimental and nonessential* and instead must manage the species under the full regime of protections available via the ESA. **Management under so-called “10(j)” designation must end.** If, as noted above, wild red wolves will be confined to federal lands and to lands owned by cooperating private interests, then Section 10(j) coverage is irrelevant and red wolves must enjoy full ESA protection.
- If red wolves are initially confined to federal lands, the USFWS must pursue cooperative agreements with private landowners adjacent to those public lands. The USFWS must make every attempt to provide the largest range of public and private lands possible, including private lands that, while not immediately adjacent to public lands, are adjacent to private lands already subject to cooperative agreements.

These agreements could include landowner incentives, land purchase or easements, and the manipulation of habitat to maximize wolf potential.

- The USFWS must be rigorous and aggressive in the investigation, arrest, and prosecution of anyone illegally taking red wolves. If the red wolf is listed as fully endangered under the ESA, it must enjoy all ESA protections against illegal take.
- The USFWS must ensure that any management protocol for endangered red wolves does not include take permits or authorizations issued to any private landowner. Additionally, non-lethal removal of a red wolf at the request of any landowner will be carried out by the USFWS field team or a designated representative.
- The USFWS must implement and fund an intensive field effort to establish and maintain a substantial, dynamic population of red wolves existing in a natural state. This effort must include a full complement of dedicated, qualified personnel to carry on proven management techniques, such as pup fostering and humane management of non-wolf *Canis* on both federal lands and private lands management by cooperative partners.
- USFWS must continue careful maintenance of captive red wolves with their routine introduction to the wild as deemed necessary to ensure genetic viability and other management goals. Reintroduction would include, but not be limited to, pup fostering.
- USFWS must continue the search for locations where additional wolf populations could be established and also protected from hybridization and human animosity.
- USFWS must initiate studies of wild *Canis*, particularly in eastern and north-central Texas, to assess the extent of, and reasons for, the apparent persistence of red wolf genetic influence.
- New taxonomic studies (genetic and classic) should be carried out to review the overall status of southeastern *Canis* and especially to analyze the complete, and probably prehistoric, specimen from Fern Cave, Alabama. This particular specimen represents the best resource for understanding the original wolf population of the southeastern United States.
- No ***canid*** hunting of any kind should be permitted on federal lands designated for red wolf management, or on private lands managed by cooperating partners.

- USFWS must conduct a program of candid, accessible and frequent reporting and outreach to the general public. This would include input from the Red Wolf Recovery Program, hunters, conservation and advocacy groups, and other interested entities. Quarterly public meetings should be conducted to disseminate information to the public and to keep all interests engaged.

### **Mailing Instructions**

Please mail your letter in time for it to arrive before the 24 July 2017 deadline.

Mail your letter to:

Public Comments Processing  
ATTN: FWS-R4-ES-2017-0006  
Division of Policy, Performance, and Management Programs  
U.S. Fish and Wildlife Service Headquarters  
MS: BPHC  
5275 Leesburg Pike  
Falls Church VA 22041-3803

If you would prefer to send an electronic comment to USFWS, please begin with the URL below:

<https://www.federalregister.gov/documents/2017/05/23/2017-10551/endangered-and-threatened-wildlife-and-plants-nonessential-experimental-population-of-red-wolves>

To start your comment, simply click the green **SUBMIT A FORMAL COMMENT** button at the top of that page.

Finally, please contact the Red Wolf Coalition at [redwolf@redwolves.com](mailto:redwolf@redwolves.com) with any questions, comments or concerns. You are also welcome to email us a copy of your comments. And finally— thanks as always for your support and your advocacy!