

Congress of the United States
Washington, DC 20515

July 27, 2018

The Honorable Ryan Zinke
Secretary
U.S. Department of the Interior
1849 C Street NW
Washington, D.C. 20240

Dear Secretary Zinke:

We are writing to express our concerns with the proposed rule published by the U.S. Fish and Wildlife Service (FWS) regarding management of the endangered North Carolina red wolf population. The proposal would remove protections for red wolves in five of North Carolina's counties and confine them to federal lands within Dare County, North Carolina, essentially rendering the red wolf extinct in the wild.¹

Specifically, the proposal would shrink the existing red wolf recovery area by 90 percent to a single national wildlife refuge and adjacent bombing range that can only support less than 15 wolves. In clear violation of the Endangered Species Act (ESA), the rule would allow any red wolf that strays outside of this small area to be killed without consequence, even though there are fewer than 35 remaining in the world.²

The proposed rule would also reallocate funding from managing the wild red wolf population to efforts to increase the captive population. Intentionally downsizing the recovery efforts for wild wolves and continuing to deem the wild population as "non-essential" to the survival of the species would have a deleterious impact on the survival of the species. The FWS should strive to help imperiled species survive in the wild instead of retreating to a plan that emphasizes captive breeding without plans for a wild release.

The FWS began to consider this current proposal and other options in 2016, including an alternative that would prioritize recovering the red wolf in the wild, with a greater focus on law enforcement and landowner outreach and incentives.³ The FWS received more than 55,000 comments (99.8% of total comments) supporting the protection of the species and opposing the proposal the FWS is currently advancing.⁴ With such strong opposition to the proposed management action, it is concerning the FWS did not choose the alternative supported by the public. Before issuing a final rule, it is imperative that the FWS reconsider this decision and choose an option that is based in science and promotes the recovery of the species.

¹ <https://www.gpo.gov/fdsys/pkg/FR-2018-06-28/pdf/2018-13906.pdf>

² Ibid.

³ <https://www.fws.gov/southeast/pdf/environmental-assessment/proposed-replacement-of-the-regulations-for-the-non-essential-experimental-population-of-red-wolves-in-northeastern-north-carolina.pdf>

⁴ <https://nywolf.org/public-comments-show-overwhelming-support-for-protecting-red-wolves-in-the-wild/>


The proposed rule represents harmful mismanagement of an imperiled species. In addition, it violates several decisions out of the United States District Court for the Eastern District of North Carolina, which held that the failure to provide for the conservation of the wild red wolf population violates the ESA.⁵ By enabling the killing of red wolves through this proposed rule, the FWS fails to provide protection for the species, violates the ESA, and jeopardizes the population's survival in the wild.

As the premier wildlife conservation agency, the FWS must enforce the ESA based on best available science to ensure long-term species survival. After more than 30 years of dedicating funding and efforts toward preventing extinction, now is not the time to give up on red wolves. We urge the FWS to listen to the public comments and reconsider this proposed rule. Furthermore, the FWS should take proactive measures to prevent permanent extinction of the species in the wild, fully implement the Red Wolf Adaptive Management Plan, reintroduce captive wolves into the wild, and reinstate an effective landowner outreach program.


We look forward to your response.


Thank you very much.

Very truly yours,


Rep. G. K. Butterfield
Member of Congress



Rep. Raúl Grijalva
Member of Congress


Rep. David E. Price
Member of Congress


Rep. Alma S. Adams, Ph.D.
Member of Congress

⁵ https://www.washingtonpost.com/news/energy-environment/wp/2016/09/29/u-s-government-you-can-kill-red-wolves-if-they-bother-you-u-s-court-no-you-cant/?utm_term=.7822e5fdbc5f

Letter to Secretary Zinke
Page 3
July 27, 2018



Rep. Donald S. Beyer, Jr.
Member of Congress

cc: The Honorable Greg Sheehan, Principal Deputy Director
U.S. Fish and Wildlife Service