

November 30, 2016

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Re: Scientists in Support of Red Wolf Recovery

We, the undersigned scientists -- with collective expertise in ecology, genetics, population dynamics, systematics, and other areas relevant to wolf conservation -- are writing in support of red wolf recovery and to express our concerns over the U.S. Fish and Wildlife Service's proposed changes to the red wolf recovery program. The Service must stem the rapid decline of the only wild population of red wolves in the world. With approximately 45 wild red wolves left -- and only three known breeding pairs, the species could be soon extirpated from the wild unless the Service allows expansion of the current population in North Carolina, resumes work to curtail hybridization with coyotes, and utilizes additional reintroduction sites across the red wolf's historic range.

I. Federal Lands in Dare County Cannot Alone Support A Viable Wild Wolf Population

Reintroduction of red wolves into eastern North Carolina was a monumental step forward for the red wolf. Yet the Service has now announced its intention to drastically reduce the recovery area and remove wolves from private and public lands in the surrounding areas. Specifically, the agency plans to propose new rules that would limit recovery of these red wolves from five counties in the state to only federal lands in Dare County, with no effective means to protect wolves that step outside the county line.¹

¹ U.S. Fish and Wildlife Service. Memo: Recommended Decisions in Response to Red Wolf Recovery Program Evaluation (Sept. 12, 2016) (hereinafter "September 2016 Recommended Decisions") at 7-8.

This one-county area cannot maintain a viable population of red wolves and thus this decision is inconsistent with red wolf recovery and best available science. The 2014 report by the Wildlife Management Institute concluded that “even the current 1.7 million acre restoration area may not be conducive to holding a viable, self-sustaining red wolf population for the long term,” but that “there is abundant, potentially suitable habitat on private and state land to the west of the current restoration area that could be occupied by red wolves.”² The 2016 Population Viability Analysis also cited space limitations as a barrier to demographic stability.³ Red wolves should be allowed to establish additional territories in the North Carolina reintroduction area rather than be actively removed from private lands and placed into captivity, so that population growth might once again continue.⁴ Additional removal of these wolves will further disrupt pack dynamics and encourage hybridization with coyotes.

Rather than stymie red wolf recovery and population growth by restricting the North Carolina recovery area, the Service should work to better protect the existing wild population through actions such as reducing gunshot mortality and gaining support from adjacent landowners. We strongly urge the Service to reconsider its decision to constrict the North Carolina recovery area for red wolves.

II. More Reintroduced Populations Are Needed For Red Wolf Recovery

Although the red wolf reintroduction program was initially successful, further recovery depends on establishing additional wild populations. The 1990 Red Wolf Recovery Plan called for the reintroduction of wolves into at least three areas,⁵ and the Wildlife Management Institute report reaffirms this need. The report found that “[s]uccessful accomplishment of the current recovery plan objectives will require identification of suitable areas and reintroduction of red wolves to two other distinct locations within historic red wolf range.”⁶ Establishment of additional reintroduction sites is long overdue and could allow for interactions between populations to achieve exchange of genetic material necessary for red wolf survival and recovery.

The Service’s September 2016 decision states that the Service will, as part of the red wolf’s five-year status review, work to identify potential reintroduction sites across the red wolf’s historic range.⁷ We support the Service’s decision to identify additional sites, and

² Wildlife Management Institute, Inc. A Comprehensive Review and Evaluation of the Red Wolf (*Canis rufus*) Recovery Program (Nov. 14, 2014) (hereinafter “WMI Report”) at 37-38.

³ Faust, L.J. et. al. Red Wolf Population Viability Analysis: Final Report for the U.S. Fish and Wildlife Service Feasibility Study (“PVA Study”) (June 10, 2016) at 17.

⁴ The captive population of red wolves is secure and does not need additional influxes of wild wolves to prevent extinction. It is not at risk of extinction. See PVA Team Letter to Cynthia Dohner (Oct. 11, 2016); PVA Study at 3.

⁵ U.S. Fish and Wildlife Service for Southeast Region. Red Wolf Recovery/Species Survival Plan (Oct. 1990) at 10.

⁶ WMI Report at 3.

⁷ September 2016 Recommended Decisions at 5.

we urge the Service to promptly move forward with these reintroductions, as well as ensure these reintroduction areas are protected from all hunting and poaching.

III. Red Wolves Are a Listable Entity Under The Endangered Species Act

We support the Service’s decision to continue to recognize the red wolf as a listable entity despite lingering questions about its origins. As noted by the Service, a recent meeting of “leading canid geneticists, as well as taxonomists and legal scholars” “could not agree on the historic genetic lineage of the red wolf, but the majority of the group concluded that the red wolf is a listable entity under the ESA.”⁸ 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.⁹ In addition, reviews of paleontological, craniometric, and historical data support recognition of *Canis rufus* as a distinct species.

For all these reasons, we ask that you accept this letter of support from the undersigned scientific experts and take all actions necessary to recover red wolves in the wild.

Sincerely,

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⁸ September 2016 Recommended Decisions at 2.

⁹ September 2016 Recommended Decisions at 2-3.

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