Congress of the United States Washington, DC 20515

December 7, 2016

The Honorable Sally Jewell Secretary Department of the Interior 1849 C Street, NW Washington, D.C. 20240

Dear Secretary Jewell,

We are writing to you today because we have grave concerns about the U.S. Fish and Wildlife Service's (the "Service") recent decision recommending steps that would largely dismantle the red wolf recovery program in North Carolina. After making significant progress toward reestablishment of wolves in eastern North Carolina in the past decade, the only existing wild red wolf population has fallen to as few as 28 known individuals.\(^1\) Over the last three years, the Service has failed to follow the best available science, has ignored the management recommendations made by independent analyses, and has taken a series of actions that has undermined the recovery of the red wolf, causing the population to fall by 50 percent. The Service has now proposed to abandon management of red wolves in the wild, and shift its focus away from "trying to establish a self-sustaining population."\(^2\) This is troubling because taxpayers, zoos, and conservation organizations in our districts and across the country have invested heavily in seeing red wolves restored in North Carolina and reintroduced elsewhere. It is essential that the Interior Department reject the Service's proposal and direct the Service to redouble its efforts to prevent extinction and jumpstart the recovery of this iconic animal.

The red wolf (*Canis rufus*) is one of the most endangered animals in the world. The species was once widely distributed across eastern and southern states from the mid-Atlantic to Texas, but uncontrolled killing nearly extirpated it by the early 1970s. As a last resort, 14 red wolves were taken into captivity in 1976 to begin a captive breeding and reintroduction program, and in 1987, red wolves were released to the wild at the Alligator River National Wildlife Refuge in North Carolina. Over the following 25 years, the Service developed one of the most innovative carnivore restoration programs in the world, a program that was widely considered to be the gold standard for the reintroduction of a species to the wild. By 2012, the wild population of red wolves had reached 130 individuals.³

¹ FWS, Recommended Decisions in Response to red Wolf Recovery Program Evaluation (September 12, 2016)., available at: https://www.fws.gov/redwolf/docs/recommended-decisions-in-response-to-red-wolf-recovery-program-evaluation.pdf

² FWS, Recommended Decisions in Response to red Wolf Recovery Program Evaluation (September 12, 2016)., available at: https://www.fws.gov/redwolf/docs/recommended-decisions-in-response-to-red-wolf-recovery-program-evaluation.pdf

³ FWS, Red Wolf Mortality Table (August 28, 2014), available at www.fws.gov/redwolf/Reviewdocuments/ 20140828 Mortality table website.pdf.

Unfortunately, 2012 proved to be the high water mark in red wolf recovery. Soon thereafter, likely in response to complaints by a small number of vocal opponents of red wolf recovery, the Service eliminated the position of the red wolf recovery coordinator, redirected staff to other programs, ended its successful pup fostering and coyote sterilization activities, halted red wolf reintroductions into the wild, and suspended the red wolf education program.

The Service sought out an independent review of the red wolf recovery program through the Wildlife Management Institute (WMI) on August 11, 2014. The WMI review concluded that while the program needed to make several changes, the recovery of the red wolf was possible if the Service invested more resources and expanded its recovery efforts.⁴ Instead of taking steps to improve red wolf recovery based on the conclusions of the report, the Service chose to shelve it, and do its own "feasibility study" of the program.⁵

Further, the Service is not pursuing prosecution of suspected illegal takes, allowing local opponents of recovery to believe that they can kill wolves with impunity. Of the 17 wolves killed by gunshot since 2013, there has not been a single prosecution. In addition, the Service has been aggressively removing wolves from private land – despite the fact that they are causing no harm to livestock or property – and holding them in pens for unknown, extended periods of time. This has resulted in an increase of wild wolves being held in captivity, disrupting pack dynamics and taking key breeding wolves from the population. Fortunately, the U.S. District Court for the Eastern District of North Carolina recently issued a preliminary injunction, preventing the Service from removing or allowing landowners to kill red wolves on private lands. This injunction makes it impossible for the Service to move ahead with its recently announced strategy, but leaves red wolves vulnerable to threats, such as hybridization with coyotes and gunshot mortality, unless the Service resumes its successful recovery efforts, including coyote sterilization efforts, releases of captive wolves and public education.

Finally, the Service's decision to focus on the captive red wolf population instead of the wild population is based on an egregious abuse of the science. The team of scientists tasked with conducting the population viability analysis (PVA) that was supposed to guide the Service's decision making on red wolves recently wrote that the Service's new plan is full of "alarming misinterpretations" that distract from the recovery program and jeopardize the continued existence of the species in the wild. This makes it clear that the Service has been trying to find justification for its desired management outcome instead of following the best available science and implementing the law as Congress intended.

⁴ WMI, Red Wolf Review (Nov. 14, 2014), available at www.fws.gov/redwolf/reviewdocuments/WMI-Red-Wolf-Review-FINAL-11142014.pdf.

⁵ FWS Press Release (Aug. 29, 2014), available at http://www.fws.gov/news/ShowNews.cfm?ID=21F9771B-D79B-0B5A-47D45DAAFEB3AC6C.

⁶ https://www.washingtonpost.com/news/energy-environment/wp/2016/10/19/scientists-say-the-governments-new-plan-to-manage-red-wolves-is-backward/

The situation for the red wolf is dire, yet there is still time to reverse course and recover this species in the wild. Because of the urgency of the situation, we ask you today to:

- 1. Direct the Fish and Wildlife Service to immediately withdraw its recent decision memorandum on the red wolf recovery program, and resume the recovery program activities that were being undertaken in 2012 prior to the Service's decision to abandon the species, including the landowner education program, and to dedicate additional personnel and resources to this effort.
- 2. Direct the Fish and Wildlife Service to resume reintroductions of captive red wolves into the wild population and to resume the successful adaptive management program to control hybridization, as well as, incorporate the results of the PVA team into its efforts to improve management of both the captive and wild red wolf populations.
- 3. Direct the Fish and Wildlife Service to increase law enforcement efforts to investigate and recommend prosecution of illegal killing of red wolves.

Please provide a response within 15 days of receipt of this letter. If you have any question, please have your staff contact Matt Strickler on the House Natural Resources Committee staff at (202) 225-6065.

Sincerely,

Raul M. Grijalva

Member of Congress

Committee on Natural Resources

Alan Lowenthal

Member of Congress

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