



CALIFORNIA STATE UNIVERSITY, STANISLAUS

ENDANGERED SPECIES RECOVERY PROGRAM

13 April 2016

Catherine Darst
Assistant Field Supervisor
U.S. Fish and Wildlife Service
2493 Portola Road, Suite B
Ventura, CA, 93003

Subject: Scientific Review Of The Proposed Rule To Remove The San Miguel Island Fox, Santa Rosa Island Fox, And Santa Cruz Island Fox From The Federal List Of Endangered And Threatened Wildlife, And Reclassify The Santa Catalina Island Fox As A Threatened Species

Dear Cat:

As requested in a letter from Stephen Henry dated 16 February 2016, I have reviewed the proposed rule to remove the San Miguel island fox, Santa Rosa island fox, and Santa Cruz island fox from the federal list of endangered and threatened wildlife, and reclassify the Santa Catalina island fox as a threatened species (hereafter referred to as the "Rule").

I am quite familiar with island foxes and recent events on the Channel Islands where the foxes occur. I began to become involved in island fox affairs back around 2000 on a volunteer basis. In 2004, I was formally invited by the U.S. Fish and Wildlife Service to participate in island fox recovery efforts as a member of the Island Fox Recovery Coordination Group (RCG). The RCG was tasked with coordinating recovery efforts being conducted by a large, dedicated group of individuals, and in particular to synthesize information and draft a recovery plan. A final plan was released in 2015. Also, in the past several years, I have participated in several island fox research projects and conservation efforts, and maintain close contacts with many researchers and land managers working on island fox conservation.

I have carefully read through the Rule and in my opinion, it is very well written and thorough. The Rule is clearly written and the logic is easy to follow. The analysis was very thorough and appears to address all of the relevant issues with regards to the past and current situation for the listed subspecies of island foxes. The rationale and justifications used in the analysis are well explained. I particularly liked Table 1 which listed the criteria for delisting/downlisting for each island and the measures and actions that were taken on each island to meet each of the criteria. Thus, I feel that the conclusions posed in the Rule are extremely well supported. Based on this analysis and my own familiarity with the status of

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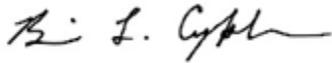
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these subspecies, I feel that the proposed delisting and downlisting actions are warranted and appropriate.

At this point in time, I do not have any additional information on island fox distribution, population size, or population trends that would further inform this analysis. Nor do I have any information on current or likely future threats, or on current or planned activities beyond what is already included in the analysis. Finally, I feel that the post-delisting/downlisting monitoring plans are appropriate and sufficient. Although protections under the Endangered Species Act may no longer be required for 3 of the subspecies and might be relaxed a bit for the fourth, island fox populations will always have measurable vulnerability due to naturally small population sizes and their insular habitats. Thus, continued population monitoring is prudent.

In summary, I felt that the Rule is very well written and that all of the conclusions and proposed actions are well justified and therefore warranted. I hope that my review is helpful and if you have any questions regarding my review, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "B. L. Cypher". The signature is fluid and cursive, with a long horizontal stroke at the end.

Brian L. Cypher
Research Ecologist
Endangered Species Recovery Program
California State University-Stanislaus
bcypher@esrp.csustan.edu