



United States Department of the Interior

FISH AND WILDLIFE SERVICE

1875 Century Boulevard

Atlanta, Georgia 30345

JUN 19 2014

In Reply Refer To:
FWS/R4/ES

Mr. Gordon Myers
Executive Director
Wildlife Resources Commission
1701 Mail Service Center
Raleigh, North Carolina 27699-1701

Dear Mr. Myers:

Thank you for your June 2, 2014, letter responding to the U.S. Fish and Wildlife Service's (Service) request for renewal of a permit from the North Carolina Wildlife Resources Commission (Commission) to trap, sterilize, and release coyotes in the five-county red wolf recovery area on North Carolina's Albemarle Peninsula. At the same time, you expressed concerns about our current management strategies and requested a program evaluation to determine whether the red wolf non-essential, experimental population (NEP) should be continued in eastern North Carolina.

The red wolf became one of the earliest federally protected species with its listing as endangered under the Endangered Species Act (ESA) on March 11, 1967. The initial phase of recovery for the red wolf involved capturing all remaining wild red wolves in Southeastern Texas and the establishment of a captive population. This action became a landmark effort in conservation and has saved this wolf from the brink of extinction. The red wolf breeding program evolved into one of the most successful captive-breeding efforts in the United States and now includes close to 200 red wolves located at 43 facilities, of which greater than 90% are independently funded conservation programs.

In 1986, the Service moved ahead with the establishment of the NEP on federal lands at Alligator River National Wildlife Refuge and Dare County Bombing Range. Efforts to establish a red wolf NEP succeeded to the point where in 1995 the Service expanded the NEP to include Pocosin Lakes National Wildlife Refuge. At this stage of the Red Wolf Recovery Program, the Service had over 310,000 acres of federal lands able to support a maximum population of approximately 45 to 55 animals of all age classes. The established recovery goal calls for a total of 220 red wolves in three separate self-sustaining populations. The NEP in eastern North Carolina is just one. A second attempt to establish a red wolf NEP was started in western North Carolina in 1991. This project ended in 1998. The locations for the other two populations have not been identified.

The Service met its population goal for the Albemarle Peninsula in the late 1990s. This significant accomplishment was a first-of-its-kind for a canid species protected under the ESA. The Service continued to manage the red wolf population to a point where it expanded on federally managed and private lands and currently is estimated to be between 90 and 110 red wolves in the NEP's five-county area. Even with this accomplishment, the red wolf in the NEP continues to face challenges, including hybridization and gunshot mortality.

Hybridization with coyotes was identified as a significant threat to the species when the Service decided to remove it from the wild in the 1970s. Now, with the expansion of coyotes across North Carolina and into formerly unoccupied habitats in the Albemarle Peninsula, hybridization must be addressed. Since 1999, the Service has trapped, sterilized and released coyotes as a tool to manage hybridization. Under our November 2013 joint memorandum, our two agencies agreed to evaluate the placeholder theory as the underlying principle for canid management in the Albemarle Peninsula. However, we acknowledge that our renewed permit to trap coyotes in the five-county area will no longer allow for sterilization and release of trapped coyotes but rather require that they be humanely euthanized. We will fully comply with your permit requirements regarding coyote trapping.

The Service fully supports appropriate management tools for canids, including hunting. We have concerns about night hunting as stated in our April 16, 2012 letter and also have concerns about the increase in red wolf gunshot mortality since 2004 in the five-county recovery area. We welcome continued conversations on the November 2013 joint memorandum which is designed, in part, to balance coyote control and red wolf recovery, as well as manage non-natural mortality (e.g., vehicular strikes).

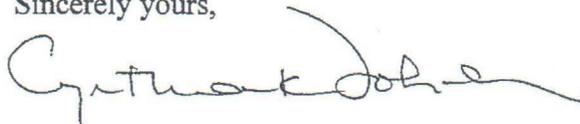
We support protecting private landowners, who through mistaken identity and without intent to take a red wolf, from prosecution under Section 9 of the ESA. The Service clarified this position in the Federal Register in April 1995, specifically finding that it is appropriate to modify the language of the special red wolf rule by limiting the Section 9 prohibition on private lands only to intentional and willful taking of red wolves.

Lastly, the Service agrees it is time to conduct a program evaluation of the red wolf recovery efforts in the Albemarle Peninsula of eastern North Carolina. We are committed to perform this evaluation together with the state as was outlined in our November 2013 agreement. In fact, we have already begun that process. This evaluation will consider the program's history and its results as well as the perspectives of all stakeholder groups including private landowners, local, state and federal agencies, and conservation partners. We also want to ensure that the evaluation addresses your concerns regarding habitat management on federal lands and the Service's implementation of legislated provisions to protect the interests of private landowners. The Service will conduct this evaluation in close coordination with the Commission. We expect to develop a scope of work for this evaluation by the end of June. To that end, I have asked Leopoldo Miranda, Assistant Regional Director of Ecological Services, to coordinate with you on the scope and logistics of this program evaluation.

The Service remains committed to continuing the collaborative approach to canid management on the Albemarle Peninsula espoused in the memorandum we jointly signed in November 2013. That agreement builds on a strong collaboration over the past five years by setting commitments to re-evaluate science, identify research needs, and establish a broad partnership. While these issues are complex, we believe our collective commitment to this strong partnership will serve us well as we identify solutions that meet our mutual conservation objectives moving forward.

Again, thank you for your work on these issues. We will be following up with you in the days ahead. In the meantime, please let me know if you have any questions or need additional information.

Sincerely yours,

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

Cynthia K. Dohner
Regional Director