



☒ North Carolina Wildlife Resources Commission ☒

Gordon S. Myers, Executive Director

June 2, 2014

Ms. Cynthia K. Dohner
Director, Southeast Region
U.S. Fish and Wildlife Service
1875 Century Blvd.
Atlanta, GA 30345

Cindy
Dear Ms. ~~Dohner~~,

I am in receipt of your agency's request for authorization to trap, sterilize, and release coyotes into the experimental red wolf reintroduction area in Dare, Hyde, Tyrrell, Washington, and Beaufort Counties for the 2014 calendar year. I am writing to outline urgent concerns associated with this request.

The Red Wolf Recovery Plan institutes the clear goal that the nonessential experimental population (NEP) of red wolves introduced into Alligator River National Wildlife Refuge (ARNWR) should be managed on "federal lands." Further, the recovery plan explicitly states the objective that the population be "self-sustaining." The U.S. Fish and Wildlife Service's (Service) 1986, 1991, and 1995 special rules for the red wolf NEP incorporate this goal and objective.

In its 1986 special rule for reintroduction of the red wolf NEP into ARNWR, the Service stated the refuge and adjacent U.S. Air Force lands could eventually sustain a red wolf population of 25 to 35 animals. In 1995, the Service amended its special rule to include additional federal lands. The Service stated the reintroduction area probably could not support 30 wolves for an extended period of time; however, the addition of Pocosin Lakes National Wildlife Refuge (PLNWR) would add approximately 112,000 acres to the reintroduction area thereby increasing the estimated carrying capacity by 15 to 25 wolves. Thus, based on the 1995 rule, it appears that the Service has estimated a total reintroduction area carrying capacity of 45 to 55 wolves.

In the 27-year period since the reintroduction of red wolves into ARNWR and subsequently into PLNWR, active management of habitat for red wolves on federal lands has been minimal. Consequently, wolves have persisted predominantly on private lands. As evidenced by research, red wolves are more likely to utilize agricultural fields than all other habitat types combined. Successional fields comprise the second most likely utilized habitat type. Both of these habitat types are primarily found on privately-owned lands. This well documented persistence on private land is not in harmony with achieving the explicit goal set forth in the Red Wolf Recovery Plan that the red wolf NEP should be managed on "federal lands."

Further, under the special rules that apply to the red wolf NEP, the Service stated "programs to purposely reintroduce predators, such as the red wolf, must be accompanied by provisions to protect private property from the presence of such reintroduced animals if the landowner does not want them on his property." Accordingly, those rules incorporate the requirement that the Service remove unwanted wolves from private land upon request of the landowner; however, the Service's internal policy guidance has severely restricted implementation of this provision. The special rules also allow direct and incidental take of red wolves by landowners under certain circumstances, including incidental take pursuant to lawful harvest of coyotes.

As a result of a recent court order, the Wildlife Resources Commission (Commission) must adopt rules to prohibit all coyote hunting in Dare, Hyde, Tyrrell, Washington, and Beaufort Counties, the same area for which the Service is seeking authorization to trap, sterilize, and subsequently release coyotes, an invasive, non-native predator species. The Commission strongly agrees with the Service that provisions that protect private property must accompany any introduction of a predator species. The recent prohibition against hunting coyotes removes a primary tool for landowners to manage coyotes.

It is assumed sterilized coyotes released into the wild as placeholders within the red wolf population will occupy the same habitats as red wolves (i.e., private lands) and present the same risks to landowners and native wildlife. The Commission strongly believes all private landowners should be allowed to use lethal control methods such as responsible hunting to manage coyotes, including sterilized "placeholder" coyotes. At a bare minimum, options available for private landowners to remove red wolves should be made available for the removal of coyotes. Current circumstances do not allow these options; therefore, I cannot authorize sterilization and release of coyotes.

The Service may continue to trap coyotes in those five counties provided that all trapped coyotes are euthanized, and other reporting information as required is provided. This management approach is consistent with the strategy that has been historically implemented in Zone 1 of the Service's Red Wolf Adaptive Management Plan.

Finally, the Commission urgently requests an immediate programmatic evaluation using the abundance of existing data to determine feasibility of achieving a stable, "self-sustaining" red wolf population on "federal lands" as prescribed in the Red Wolf Recovery Plan. This request is consistent with requirements in Section 4 (f)(1)(B)(iii) of

the Endangered Species Act, which requires that recovery plans include "estimates of the time required and the cost to carry out those measures needed to achieve the plan's goal and to achieve intermediate steps toward that goal." The results of this evaluation should be used to determine the appropriateness of continuing the experimental program as was undertaken for the red wolf NEP introduced into Great Smoky Mountains National Park in 1991. As you are aware, that program was discontinued in 1998 due to low pup survival and inability of the red wolves to establish home ranges on "federal land."

Thank you for your openness in discussing these matters and your continued collaboration in the management of canids on the Albermarle Peninsula. Please let me know if you have any specific questions or would like to discuss these matters in greater detail.

Sincerely,

A handwritten signature in black ink, appearing to read "Gordon Myers", with a long horizontal flourish extending to the right.

Gordon Myers
Executive Director

cc: Honorable Governor Pat McCrory
Honorable Senator Richard Burr
Honorable Senator Kay Hagan
Honorable Representative Walter Jones, Jr.
Commissioners, WRC