

*State of North Carolina
Office of the Governor*

*Roy Cooper
Governor*

November 22, 2019

*20301 Mail Service Center
Raleigh, N. C. 27699-0301*

Mr. David Bernhardt, Secretary
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240

Dear Secretary Bernhardt:

The American red wolf is on the brink of extinction in the wild. I urge the United States Fish and Wildlife Service (FWS) to act immediately to rebuild and sustain a wild red wolf population. Wild red wolves have strong public support in North Carolina, attract tourists from across the country, and are part of the cultural and economic fabric of our state. As home to the only population of wild red wolves in the world, North Carolina is committed to working with FWS to ensure the successful recovery of this endangered species.

The FWS's Red Wolf Recovery Program has been a global model for successful reintroductions, but changes in management strategies over the last several years have diminished the wild population to a dangerous level. This population decline has occurred despite the availability of proven conservation strategies, such as coyote sterilization and captive wolf reintroductions.

In July 2018 my administration submitted comments recommending changes to the FWS's proposed rule entitled "Endangered and Threatened Wildlife and Plants; Proposed Replacement of the Regulations for the Nonessential Experimental Population of Red Wolves in Northeastern North Carolina," which would significantly scale back wild red wolf protections. We urged the FWS to recommit to wild red wolf recovery by resuming proven management strategies, rather than scale back the program.

Unfortunately, one year later, the wild red wolf population continues to decline. While FWS efforts were instrumental in building the wild population to approximately 130 animals by about 2006, today there are only fourteen known red wolves in the wild and no active breeding pairs. Last spring was the first in the history of the reintroduction program without a new litter of wild red wolf pups born in North Carolina.

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The continued decline of this critically endangered species is unacceptable. Recent developments strengthen the scientific and legal basis for continued red wolf protection. In March 2019 the National Academy of Sciences, in a congressionally mandated report, confirmed that red wolves are a taxonomically distinct species. Further, in November 2018 a federal court held that the FWS was improperly allowing the species to decline despite having access to conservation strategies that could maintain the wild population. In light of these developments and the now perilously low population numbers, it is critical that the FWS take action to increase the existing wild red wolf population.

My administration is committed to work with the FWS in this effort. I ask that you consider the substantive comments from the North Carolina Department of Natural and Cultural Resources that accompany this letter. These comments further explain North Carolina's support of wild red wolves and recommend immediate steps FWS can take to support recovery of the wild population.

Thank you for your consideration of this issue. Please do not hesitate to contact Secretary Susi Hamilton of the N.C. Department of Natural and Cultural Resources for additional information.

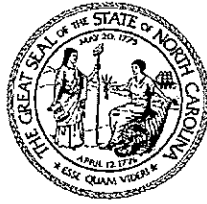
With kind regards, I am

Very truly yours,

A handwritten signature in black ink, appearing to read 'RC', is written over the typed name 'Roy Cooper'.

Roy Cooper

cc: Margaret Everson, Principal Deputy Director Exercising the Authority of the
Director, U.S. Fish and Wildlife Service
Leopoldo Miranda, Regional Director, Southeast U.S. Fish and Wildlife Service
Peter Benjamin, Field Supervisor, Raleigh Field Office
Joseph Madison, Project Leader, Threatened and Endangered Species
Conservation, Red Wolf Recovery



**North Carolina Department of Natural and Cultural Resources
Office of the Secretary**

Governor Roy Cooper

Secretary Susi H. Hamilton

November 22, 2019

The Honorable David Bernhardt
Secretary
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240

Dear Secretary Bernhardt:

The North Carolina Department of Natural and Cultural Resources (DNCR) is proud of the collaborative efforts that make North Carolina the only place where the American red wolf exists in the wild. For more than thirty years, the United States Fish and Wildlife Service (FWS) and the State of North Carolina have been partners in restoring this critically endangered species to its natural habitat.

Together, we had made much progress by restoring the wild population from only 14 in 1973 to a peak of around 130 in the 2000s.

Unfortunately, due to changes in management approach, the current situation confronting the American red wolf is again dire. Today, there are only fourteen known red wolves in the wild. There are no active breeding pairs and no intact packs of wild red wolves. For the first time in the history of the reintroduction program, there were no new litters of wild red wolf pups born this past spring.

Two recent developments, in addition to plummeting populations, underscore the urgency of efforts to save wild red wolves. First, in November 2018 a federal district court ruled that the FWS's actions to halt reintroductions and pup-fostering, and its failure to manage coyote populations violated both the Endangered Species Act and the National Environmental Policy Act.

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Raleigh, NC

Second, in March 2019, a congressionally mandated report from the National Academy of Sciences confirmed that red wolves are a taxonomically distinct species. As the report states:

"The available evidence from morphology, behavior, and ecology, combined with genetic evidence of a relatively deep divergence and the maintenance of some unique genetic ancestry, suggest that the most appropriate taxonomic designation for red wolves is as a distinct species that possibly has historical admixture." (National Academy of Sciences 2019)."

DNCR supports recent efforts by FWS to publish an updated species status assessment and urges FWS to reconvene the Albemarle Peninsula Collaborative Canid Conservation Team to jointly manage the recovery of the red wolf.

However, given the urgent situation, immediate additional action is needed to ensure a sustainable wild red wolf population in North Carolina. Specifically, DNCR urges FWS to take the following steps as soon as possible:

- **Introduce breeding pairs into the wild.** We understand that FWS is in the initial stages of planning to release two juvenile red wolves in December 2019 into the Alligator River National Wildlife Refuge. We support this plan, and DNCR will assist in the operation in whatever ways are feasible and appropriate. New breeding pairs must be introduced quickly, and the release of these two juveniles is the best available option to do so.
- **Resume release of captive pups into wild dens.** In the past, pup fostering has proven to be a useful tool in red wolf recovery efforts. Starting in 2002, the recovery program successfully transplanted captive pups from the North Carolina Zoo and other facilities into existing wild dens. In addition to increasing the wild population's numbers, these efforts also enhance the population's genetic diversity, which is crucial for the species' long-term viability. Once red wolf breeding pairs are reestablished in North Carolina, FWS should work with the North Carolina Zoo and other state partners to restart the pup fostering program.
- **Maintain the current five-county recovery area and work with state agencies to identify more lands that could function as habitat for red wolves.** Maintaining a large landscape is essential for long-term recovery of the red wolf. FWS should maintain the five-county recovery area and work with DNCR, WRC, other state agencies and willing landowners to identify and preserve lands that are, or could be, important red wolf habitat.

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- **Restart and adequately fund the coyote sterilization program** and other strategies outlined in the Red Wolf Adaptive Management Program.
- **Protect wild red wolves from gunshot mortalities** through sincere and expanded engagement with local communities including education programs, local partnerships, addressing the concerns of some landowners, removal of red wolves from private property upon request, and other strategies. A comprehensive and participatory approach to community outreach is essential to the success of red wolf recovery.
- **Support targeted education efforts that assist in understanding and appreciating the American red wolf** and its natural history. It is critical to provide tools for residents to distinguish red wolves from coyotes, assuage concerns about perceptions of the threat posed by red wolves to people and livestock, and convey the positive effects a sustainable American red wolf population could have on the local environment and tourism economy.

DNCR's natural resources divisions share the mandate to conserve and protect North Carolina's natural heritage. That is why the NC Zoo, Division of Parks and Recreation, Natural Heritage Program, and Clean Water Management Trust Fund, all within DNCR, have invested significant time, energy and resources in the effort.

Thank you for considering this request. Once again, North Carolina's Department of Natural and Cultural Resources remains committed to the recovery of the American red wolf and stands ready to assist FWS in this effort. Please do not hesitate to contact us for additional information.

Sincerely,



Susi H. Hamilton, Secretary
NC Department of Natural and Cultural Resources

cc: Margaret Everson, Principal Deputy Director Exercising the Authority of the Director,
U.S. Fish and Wildlife Service,

Leopoldo Miranda, Regional Director, Southeast U.S. Fish and Wildlife Service, and

Peter Benjamin, Field Supervisor, Raleigh Field Office

Joseph Madison, Project Leader, Threatened and Endangered Species Conservation, Red Wolf Recovery