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July 30, 2018

U.S. Fish and Wildlife Service
Raleigh Ecological Services Field Office
Field Supervisor Pete Benjamin
551F Pylon Drive
Raleigh, NC 27606

Re: Comment on Proposed Rule for the Nonessential Experimental Population of Red Wolves in Northeastern North Carolina, Dockett No. FWS-R4-ES-2018-0035

Dear Field Supervisor Pete Benjamin,

Thank you for the opportunity to submit this Comment addressing the proposed rule: "Endangered and Threatened Wildlife and Plants; Proposed Replacement of the Regulations for the Nonessential Experimental Population of Red Wolves in Northeastern North Carolina." On behalf of Born Free USA and our North Carolina supporters, we urge the U.S. Fish and Wildlife Service (USFWS) not to pass a proposed rule that will significantly decrease recovery efforts for the red wolf.

The proposed rule would dramatically decrease red wolf habitat from a five county range to one county and the Dare County Bombing Range. This proposed rule will further allow the taking of endangered red wolves, without consequence, by private landowners when a wolf wanders off the protected range and onto private property. These proposed changes should fail because decreasing recovery efforts of the red wolf goes against the will of the majority of North Carolinians, including the majority of Americans; will harm North Carolina's ecosystem; and goes against what the USFWS is required to do by law.

First, the red wolf is the only wolf species endemic to the southeastern United States, and despite unsubstantiated rumors, the majority of North Carolinians, along with the majority of Americans, are in support of repopulating red wolf populations to their natural habitat range. In 2016, 73% of North Carolinians supported red wolf recovery, 77% supported recovering endangered species in their native habitat, and 60% of registered voters in North Carolina's Albemarle Peninsula (which includes the red wolf recovery area) supported red wolf recovery.[1] In 2017, an analysis of the USFWS red wolf comment period was analyzed and 54,992 out of 55,087 (99.8%) comments supported red wolf recovery efforts in North Carolina.[2] Furthermore, 98.6% of comments from North Carolinians urged

[1] "Defenders of Wildlife." *New Poll Reveals Statewide Support for Red Wolf Recovery in North Carolina,* https://defenders.org/publications/Defenders-of-Wildlife-Red-Wolf-Public Memo.pdf?_ga=2.212255197.85827252. 1532360084-1034737858.1518098910. Accessed July 27, 2018.

[2] "Wildlands Network." *Public Comments Show Overwhelming Support for Protecting Red Wolves in the Wild,* https://wildlandsnetwork.org/blog/public-comments-show-overwhelming-support-protecting-red-wolves-wild/. Accessed July 27, 2018.

the USFWS to do more to save the endangered red wolf, and 68.4% of residents in the current five county red wolf recovery area were supportive of red wolf recovery efforts.[3]

Second, significantly reducing red wolf habitat, whereby reducing the total number of red wolves that can be supported, and allowing the taking of red wolves, will put North Carolina's ecosystem in jeopardy. Countless ecological conservation studies have been conducted outlining predator-prey relationships and their relation to ecosystems. An ecosystem consists of both abiotic components, such as sunlight, temperature, and precipitation, and biotic components, such as omnivores, herbivores (white-tailed deer, rabbits, and rodents), and carnivores (wolves). Each has an essential role, where if one component declines, it creates a domino effect and the system fails, unraveling the ecosystem. The abiotic components (sunlight, temperature, and precipitation) allow for vegetation that the biotic components (omnivores, herbivores, such as white-tailed deer, rabbits, and rodents) consume. Carnivores (wolves), another biotic component, prey on the white-tailed deer, rabbits, and rodents; thereby, regulating their populations. If the wolf population declines, the white-tailed deer, rabbit, and rodent populations flourish and they will consume all the vegetation. This may then create vegetation loss, erosion, flooding, and the decline of other species that rely on the domino effect. This is basic science and ecology.

Finally, the U.S. Fish and Wildlife Service is the governmental agency tasked with protecting our National Wildlife Refuges and the Endangered Species Act (ESA). The USFWS lists the red wolf as endangered, and if the proposed rule passes, effectively abandoning red wolf recovery efforts, the USFWS will be disregarding federal law. By law, the USFWS is required to adhere to the ESA and its policies and processes, including promoting the recovery of species listed under the ESA, not their decline. The new proposed protected habitat range for the red wolf is estimated to support only approximately 15 wolves,[4] thereby the species will further decline and never recover to prior numbers or habitat range.

In light of this, Born Free strongly urges the U.S. Fish and Wildlife Service not to pass the proposed rule that will significantly decrease recovery efforts for the red wolf.

Thank you for your consideration of this matter.

Sincerely,

Julie J. Kluck

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[3] *Id.*

[4] "Phys.org." *U.S. Proposed Shrinking Last Endangered Red Wolf Habitat,* https://phys.org/news/2018-06-endangered-red-wolf-habitat.html. Accessed July 27, 2018.