July 30, 2018

U.S. Fish and Wildlife Service
5275 Leesburg Pike
Falls Church, VA 22041

RE: FWS-R4-ES-2018-0035

Dear U.S. Fish and Wildlife Service:

Thank you for the opportunity to comment on the U.S. Fish and Wildlife Service’s (Service) proposed rule to replace the regulations codified at 50 C.F.R. § 17.84(c) for the nonessential experimental population of red wolves in North Carolina. We are encouraged by the Service’s willingness to retool the red wolf program to support state wildlife management goals, reduce conflict with private landowners, and ultimately further red wolf conservation efforts.

The Congressional Sportsmen’s Foundation (CSF) was founded in 1989 with a mission to work with Congress, governors, and state legislatures to protect and advance hunting, angling, trapping, and recreational shooting. Through our work with state and federal government partners and sportsmen’s caucuses at the federal, gubernatorial, and state legislative levels, we work to protect our country’s outdoor sporting traditions by supporting pro-sportsmen’s policy and state fish and wildlife management objectives. CSF has tracked the red wolf program in North Carolina for many years working with hunting conservation organizations and the North Carolina Legislative Sportsmen’s Caucus, which submitted comments to the Service on September 12, 2014 and again on April 13, 2015, to analyze the effectiveness of the program and its impacts on state wildlife resources.

We applaud the Service for listening to input from sportsmen and women, private landowners, the North Carolina Wildlife Resources Commission, and other members of the public that have expressed concerns about the program. We share similar concerns about the program’s high costs, lack of broad public support, negative impacts on private and public land hunting opportunities, regulatory burdens on private landowners, and frustration of state canid management objectives.
We strongly urge the Service to consider the recommendations of the North Carolina Wildlife Resources Commission as they have joint-trust resource management responsibilities for wildlife both outside of and on federal lands.

For the long term success of red wolf conservation efforts, CSF recommends the Service focus its efforts on increasing the capacity of the red wolf captive population. Additionally, CSF specifically recommends:

(1) Revising the boundaries of the NC NEP designated area to exclude all private, state, and federal lands other than the Alligator National Wildlife Refuge and the Dare County Bombing Range;

(2) Removing red wolf take prohibitions on private, state, and federal lands not in the NC NEP designated area;

(3) Including incidental taking of red wolves during legal coyote hunting within the definition of unintentional take in the NC NEP designated area; and

(4) Prohibiting the release of additional animals into the NC NEP designated area without express consent from the North Carolina Wildlife Resources Commission.

Thank you for considering our comments, and we look forward to working with you as this process unfolds.

Sincerely,

John Culclasure
Central Appalachian States Manager
Congressional Sportsmen’s Foundation
jculclasure@congressionalsportsmen.org
(804) 918-2822