

Subcommittee on Oversight and Investigations

Louie Gohmert, Chairman

Hearing Memorandum

September 21, 2016

To: All, Subcommittee on Oversight and Investigations Members

From: Majority Staff, Subcommittee on Oversight & Investigations (x5-7107)

Hearing: Oversight hearing entitled "*The Status of the Federal Government's Management of Wolves*"

The House Committee on Natural Resources, Subcommittee on Oversight and Investigations will hold an oversight hearing entitled, "*The Status of the Federal Government's Management of Wolves*" on **Wednesday, September 21, 2016, at 2:00 p.m. in Room 1334 of the Longworth House Office Building.**

Policy Overview:

- This hearing will inform the Committee about the status of federal and state wolf management and recovery efforts in the United States. The federal government currently manages wolf populations in the Western Great Lakes, the Southwest, portions of the Northwest, Utah and North Carolina.
- Federal management of wolves has been ineffective, and in the case of red wolves in North Carolina, a failure. In many instances, the U.S. Fish and Wildlife Service (FWS) has not worked effectively with states and local stakeholders in wolf recovery efforts. FWS has not adequately addressed the causes of the failure of the North Carolina red wolf program, including hybridization, underestimation of habitat required for a sustainable population, and failure to build informative, positive relationships with landowners and the State.
- Despite unsuccessful management, FWS recently announced its intention to *expand* red wolf reintroduction in yet to be determined locations within the vast region between Texas and Pennsylvania and the Atlantic Coast. FWS intends to move forward with this expansion even though it has not resolved scientific issues that bear upon whether the red wolf is a listable species, and the location of its historic range.
- FWS is preparing for the possibility of expanding Mexican wolf reintroduction in the Southwest, and into Utah and Colorado. FWS has not adequately consulted with these states about the expansion.
- State management has proven effective and appropriately balances recovery goals with the needs of citizens and the multi-use purpose of public lands. State management should occur wherever possible and at the earliest possible juncture of the recovery process.

- FWS efforts to delist recovered species are continuously challenged in court. Ongoing litigation by certain environmental interest groups undermines congressional intent regarding the Endangered Species Act (ESA), particularly as it relates to wolf management. Such lawsuits hinder recovery efforts and state management processes, resulting in years of costly litigation and the superfluous need for additional congressional action on a recovered species by recovered species basis.
- Wolf populations present a threat to public safety while causing economic losses from livestock predation and infringe upon private property. FWS has not adequately handled the presence of wolves on private property and ranchers are frequently prevented, by law, from taking wolves who kill their livestock or family pets.
- Predation compensation and prevention processes are unnecessarily burdensome on citizens and make it difficult to proactively prevent livestock losses. For example, terrain and the nature of livestock operations can jeopardize the ability to definitively identify instances of wolf predation on livestock, making it impossible for ranchers to recover from predation compensation programs. Predation issues remain across all regions and must be addressed.

Invited Witnesses:

Mr. Steve Guertin

Deputy Director of Policy
U.S. Fish and Wildlife Service
U.S. Department of the Interior
Washington, D.C.

Mr. Virgil Moore

Director, Idaho Department of Fish and Game
State of Idaho
Boise, Idaho

Mr. Gordon Myers

Director, North Carolina Wildlife Resources Commission
State of North Carolina
Raleigh, North Carolina

Ms. Alexandra Sandoval

Director, New Mexico Department of Game and Fish
State of New Mexico
Santa Fe, New Mexico

Mr. Tom Paterson

Owner
Spur Ranch Cattle Company
Luna, New Mexico

Mr. John Vucetich
Associate Professor
Michigan Technological School of Forest Resources and Environmental Science
Michigan Tech University
Houghton, Michigan

Mr. Brian Bean
Owner
Lava Lake Lamb
Hailey, Idaho

Background on Wolf Populations in the United States:

The federal government has managed wolves primarily in four regions of the United States, including gray wolves in the Northwest and Western Great Lakes, red wolves in North Carolina, and Mexican wolves in the Southwest.

Gray Wolves – Pacific Northwest United States and Western Great Lakes

- Gray wolves were listed under the ESA in 1974.¹ The federal government introduced the species *canis lupus irremotus* to the Northwest by removing wolves from Canada and releasing them in central Idaho and Yellowstone National Park in 1994-1995.² The reintroduction was opposed by the states, local citizens, livestock groups, and sportsmen.³
- The population recovered and expanded more quickly than anticipated, and in September 2001, FWS documented 30 breeding pairs throughout Idaho, Montana and Wyoming. The states and tribes began working with FWS to formulate plans that would effectively transition management responsibility to the states upon delisting.⁴
- FWS deemed the Idaho and Montana wolf management plans adequate, but did not approve the Wyoming plan. As a result, FWS refused to delist the wolves in any state until the Wyoming plan was acceptable, even though the species had recovered.⁵ Litigious groups challenged the FWS decision to delist the wolves, and ESA policy is frequently determined in court.⁶ In 2005 alone, wolves were listed, down-listed in court,

¹ The Endangered Species Act of 1973, 16 U.S.C. § 1531 (1973).

² See, National Park Service, *Wolf Restoration Timeline*, THE NATIONAL PARK SERVICE (SEPT. 15, 2016, 4:29 PM), <https://www.nps.gov/yell/learn/nature/wolf-restoration.htm>.

³ See, Letter from C.L. “Butch” Otter, Governor, State of Idaho, to Ken Salazar, Secretary, U.S. Department of the Interior (October 18, 2010) (available at: <http://fishandgame.idaho.gov/public/wildlife/wolves/?getPage=161>).

⁴ See, STATE OF IDAHO, IDAHO DEPARTMENT OF FISH AND GAME, IDAHO WOLF MANAGEMENT PLAN (2002) (available at: <http://fishandgame.idaho.gov/public/docs/wolves/plan02.pdf>). See also, STATE OF MONTANA, MONTANA DEPARTMENT OF FISH, WILDLIFE, AND PARKS, MONTANA WOLF CONSERVATION AND MANAGEMENT PLAN (2002) (available at: <http://fwp.mt.gov/fishAndWildlife/management/wolf/management.html>).

⁵ See, 16 U.S.C. §10(J) (1973). See also, *Wyoming Farm Bureau v. Babbitt*, 987 F. Supp. 1349 (D. Wyo. 1997).

⁶ See, *Id.*, and *Defenders of Wildlife v. Hall*, 565 F.2d 1160 (D. Mont. 2008), and *Defenders of Wildlife v. Salazar* 354 F. Supp. 2d 1156 (D. Ore. 2005).

and then again, relisted. Finally in 2006, day-to-day management of wolf populations were transferred to Idaho and Montana, but not Wyoming.⁷

- Gray wolves were removed from the Endangered Species List on January 14, 2009.⁸
- As part of their management plans, Idaho and Montana conducted tightly controlled wolf hunts beginning in the autumn of 2009. Sales of wolf hunt tags fund management activities, and hunts are conducted in a similar fashion to those of large ungulates and other wild animals under state management. State management has allowed for healthy and sustainable populations of wolves, elk, and other animals.⁹
- Environmental groups opposing the delisting and state management decision to allow hunts filed suit again. In August 2010, a judge from the U.S. District Court for the District of Montana held that the FWS rule delisting gray wolves did not comply with the congressional intent of the ESA, in that it incorrectly allowed delisting of a species which was still endangered in a portion of its region (Wyoming). Management responsibility for Idaho and Montana wolves returned to FWS.¹⁰
- Idaho Congressman Mike Simpson and Montana Senator Jon Tester included a provision in the FY 2012 appropriations bill that clarified the congressional intent to remove the wolves from the Endangered Species List, returning them to state management.¹¹ Appropriations provisions to de-list the wolf and allow states to retain management authority have been included in each successive year.
- Thriving wolf populations have expanded throughout the region into Washington, Oregon, Utah, and California. Populations migrate between Canada and the northern United States border. In Washington, Oregon and Utah, the gray wolf remains federally-listed in portions of those states and de-listed in other portions. The arbitrary listing determinations have literally been separated by highways and artificial state and international boundaries on maps.

⁷ U.S. DEPARTMENT OF THE INTERIOR, FISH AND WILDLIFE SERVICE, MEMORANDUM OF AGREEMENT BETWEEN THE SECRETARY OF THE INTERIOR AND THE STATE OF IDAHO (2006) (available at: <https://www.fws.gov/pacific/news/2006/documents/IDWolfMOA.pdf>).

⁸ See, Endangered and Threatened Wildlife and Plants; Final Rule to Identify the Western Great Lakes populations of Gray Wolves as a Distinct Population Segment and to Revise the List of Endangered and Threatened Wildlife, 74 Fed. Reg. 15070 (Apr. 2, 2009) (available at: <https://www.fws.gov/Midwest/wolf/archives/2009delisting/pdf/fnlruleFR02april2009.pdf>).

⁹ See, Press Release, State of Idaho Department of Fish and Game, Idaho's First Wolf Hunt is Over (Apr. 5, 2010) (available at: <https://fishandgame.idaho.gov/public/docs/wolves/news10.pdf>) and STATE OF MONTANA, DEPARTMENT OF FISH, WILDLIFE, AND PARKS, THE 2009 MONTANA WOLF HUNTING SEASON (2010) (available at: <file:///C:/Users/molmstead/Downloads/2009%20Wolf%20Hunting%20Season%20Summary.pdf>).

¹⁰ See, *Defenders of Wildlife v. Salazar*, 729 F.2d. 1207 (2010).

¹¹ Press release, U.S. Congressman Mike Simpson, Simpson's Wolf Language Included in Final Funding Bill (Apr. 12, 2011) (available at <http://simpson.house.gov/News/DocumentSingle.aspx?DocumentID=235258>). See also, Consolidated Appropriations Act 2012, Pub. L. No. 112-74 (2011) (available at: <https://www.congress.gov/resources/display/content/Appropriations+for+Fiscal+Year+2012#AppropriationsforFiscalYear2012-omnibusappropriations>), and National Park Service, *Wolf Restoration Timeline*, THE NATIONAL PARK SERVICE (SEPT. 15, 2016, 4:29 PM), <https://www.nps.gov/yell/learn/nature/wolf-restoration.htm>.

- Populations of gray wolves already present in the Western Great Lakes region also were regulated under the ESA and increased through the 1990's and 2000's. They were delisted in Minnesota, Wisconsin, and Michigan in 2012.¹²
- Wolves in Wyoming and in the Western Great Lakes region were re-listed in 2014 due to additional court decisions that challenged the adequacy of state management plans.¹³ FWS currently retains gray wolf management authority in Wyoming, Minnesota, Michigan, and Wisconsin.¹⁴
- The FY 2017 U.S. House Interior and Appropriations bill (H.R. 5538) includes a provision to delist the wolves in the Western Great Lakes and Wyoming, allowing for state management.¹⁵ The U.S. House also passed the SHARE Act (H.R. 2406) in February 2016, which also included such a provision. Both bills are currently under consideration in the Senate.¹⁶ The wolf provision from the SHARE act was included in the North American Energy Security and Infrastructure Act of 2016 (S. 2012) which the Senate passed in May.¹⁷
- FWS reports that there were 1,802 wolves in Idaho, Montana, Wyoming, Washington, and Oregon in 2015 and 3,606 wolves in Minnesota, Michigan, and Wisconsin in 2015.¹⁸
- Wolf predation continues to impact ranchers, causing loss of livestock and economic hardship.¹⁹ FWS reports that 158 cattle, 218 sheep, 4 dogs, and 3 horses were killed by wolves in 2015.²⁰ This number does not account for wolf kills in the Great Lakes region, or wolf kills that could not be definitively proven. It also does not account for the effect of wolf predation—for example, orphaned calves.

¹² See, U.S. DEPARTMENT OF THE INTERIOR, U.S. FISH AND WILDLIFE SERVICE, GRAY WOLF RECOVERY IN MINNESOTA, WISCONSIN, AND MICHIGAN (2011) (available at: <https://www.fws.gov/midwest/wolf/aboutwolves/r3wolfrec.htm>) and Endangered and Threatened Wildlife and Plants; Revising the Listing of the Gray Wolf (*Canis Lupus*) in the Western Great Lakes, 76 Fed. Reg. 81666 (Dec. 28, 2011) (available at: https://www.fws.gov/midwest/wolf/archives/2011FinalDelisting/pdf/FR_grwoWGLDelist28Dec2011.pdf).

¹³ See, *Humane Society v. Jewell*, 2014 WL 7237702 (D.D.C.2014), and *Defenders of Wildlife v. Jewell*, 2014 WL 4714847 (D.D.C. 2014).

¹⁴ Endangered and Threatened Wildlife and Plants; Reinstatement of Final Rules for the Gray Wolf in Wyoming and the Western Great Lakes in Compliance with Court Orders, 80 Fed. Reg. 9218 (Feb. 20, 2015) (available at: <https://www.gpo.gov/fdsys/pkg/FR-2015-02-20/pdf/2015-03503.pdf>).

¹⁵ Fiscal Year 2017 Interior and Environment Appropriations bill, H.R. 5538, 114th Cong. (2016) (available at: <https://www.gpo.gov/fdsys/pkg/BILLS-114hr5538eh/pdf/BILLS-114hr5538eh.pdf>).

¹⁶ SHARE Act, H.R. 2406, 114th Cong. (2016) (available at: <https://www.gpo.gov/fdsys/pkg/BILLS-114hr2406eh/pdf/BILLS-114hr2406eh.pdf>).

¹⁷ North American Energy Security and Infrastructure Act of 2016, S. 2012, 114th Cong. (2016) (available at: <https://www.gpo.gov/fdsys/pkg/BILLS-114s2012es/pdf/BILLS-114s2012es.pdf>).

¹⁸ U.S. Fish and Wildlife Service, *Gray Wolf Current Population in the United States*, U.S. FISH AND WILDLIFE SERVICE (SEPT. 16, 2016, 1:11 PM) <https://www.fws.gov/midwest/wolf/aboutwolves/wolfpopus.htm>.

¹⁹ See, *Wolves Kill 176 sheep near Victor, Greatest Loss Recorded in Idaho*, THE ASSOCIATED PRESS, Aug. 24, 2013, at <http://agenda21news.com/2013/08/wolves-kill-176-sheep-near-victor-greatest-loss-recorded-idaho/>. See also, Austin Hill, *Idaho Senator: Family Business Threatened by Gray Wolves*, IDAHO REPORTER.COM, Sept. 6, 2013, at <http://idahoreporter.com/32190/idaho-senator-family-business-threatened-by-gray-wolves/>. See also, Lynda V. Mapes, *Claim that Rancher Turned Out Cattle on Wolf Den Untrue, WSU says*, THE SEATTLE TIMES, Aug. 31, 2016, at <http://www.seattletimes.com/seattle-news/environment/claim-that-rancher-turned-out-wolves-on-den-untrue-wsu-says/>.

²⁰ U.S. FISH AND WILDLIFE SERVICE, NORTHERN ROCKY MOUNTAIN WOLF RECOVERY PROGRAM 2015 INTERAGENCY ANNUAL REPORT (2015) (available at: https://www.fws.gov/mountain-prairie/es/species/mammals/wolf/2016/FINAL_NRM%20summary%20-%202015.pdf).

Mexican Gray Wolves – Southwestern United States

- The Mexican wolf, *canis lupus baileyi*, was listed under the ESA in 1976.²¹ Its range was determined to exist in Mexico, New Mexico, Arizona, and Texas.²²
- The United States and Mexico established a bi-national captive breeding program in the early 1980's. However, the recovery plan does not provide for reintroduction of Mexican wolves to the wild.²³
- In 1998 the FWS established a non-essential experimental population and wolves from the captive breeding program were released in the Blue Range Wolf Recovery Area in New Mexico and Arizona.²⁴
- In December 2015, FWS announced that it is revising the 1982 recovery plan and intends to publish a draft plan in early 2017.²⁵ This plan may include expansion of the reintroduction into Utah and Colorado. The governors of Utah and Colorado, and the respective state wildlife commissioners from each state have spoken out against reintroduction of wolves.²⁶
- On May 13, 2016 the State of New Mexico filed suit to enjoin FWS from releasing additional wolves without proper state permits. FWS intended to expand the reintroduction area for the experimental nonessential population to property in both states between Interstate 40 and the Mexican border.²⁷
- A federal judge granted the injunction on June 10, 2016, finding that FWS was required to consult with the State of New Mexico prior to releasing wildlife.²⁸
- FWS reports that 97 Mexican wolves were present in the Southwest recovery area in 2015.²⁹

²¹ 16 U.S.C. § 1531.

²² See, U.S. Fish and Wildlife Service, *Mexican Wolf Recovery Timeline*, U.S. FISH AND WILDLIFE SERVICE (SEPT. 15, 2016, 7:07 PM) https://www.fws.gov/southwest/es/mexicanwolf/RP_history.cfm.

²³ *Id.* See also, U.S. DEPARTMENT OF THE INTERIOR, U.S. FISH AND WILDLIFE SERVICE, MEXICAN WOLF RECOVERY PLAN (1982) (available at: https://www.fws.gov/southwest/es/mexicanwolf/pdf/Mexican_Wolf_RP_1982.pdf).

²⁴ *Id.* See also, Endangered and Threatened Wildlife and Plants: Establishment of a Nonessential Experimental Population of the Mexican Gray Wolf in Arizona and New Mexico, 63 Fed. Reg. 1752 (Jan. 12, 1998) (available at: https://www.fws.gov/southwest/es/mexicanwolf/pdf/MW_Final_Rule.pdf).

²⁵ U.S. Fish and Wildlife Service, *Mexican Wolf Recovery Planning*, U.S. FISH AND WILDLIFE SERVICE (SEPT. 15, 2016, 7:20 PM) <https://www.fws.gov/southwest/es/mexicanwolf/MWRP.cfm>.

²⁶ See, Dan Elliott, *Suspicion Over Federal Wolf Plan Spreads to Colorado, Utah*, THE ASSOCIATED PRESS, Jan. 17, 2016, at <http://www.seattletimes.com/seattle-news/suspicion-over-federal-wolf-plan-spreads-to-colorado-utah-2/>.

²⁷ Benjamin Fisher, *Wolf Lawsuit Watched Closely Here*, SILVER CITY DAILY PRESS, May 18, 2016 at <http://www.scdailypress.com/site/2016/05/18/wolf-lawsuit-watched-closely-here/>.

²⁸ Rebecca Moss, *Judge Bars Feds from Releasing More Mexican Gray Wolves in the Wild*, THE SANTA FE NEW MEXICAN, June 10, 2016 at http://www.santafenewmexican.com/news/local_news/judge-bars-feds-from-releasing-more-mexican-gray-wolves-in/article_fd269d5c-5526-5d1e-bb73-bfac64bbe303.html.

²⁹ U.S. FISH AND WILDLIFE SERVICE, NORTHERN ROCKY MOUNTAIN WOLF RECOVERY PROGRAM 2015 INTERAGENCY ANNUAL REPORT (2015) (available at: https://www.fws.gov/mountain-prairie/es/species/mammals/wolf/2016/FINAL_NRM%20summary%20-%202015.pdf).

- Wolf-caused livestock depredation negatively impacts ranchers in New Mexico and Arizona, and instances of depredation have been deliberately mismanaged by FWS.³⁰
- In July 2016 the Department of the Interior Office of Inspector General (OIG) reported that FWS employees had failed to properly document wolf nuisance complaints, had mismanaged and interfered with livestock depredation investigations, and had undercompensated ranchers for loss of livestock. According to the OIG, the involved employees have been reassigned, but not been fired from FWS.³¹

Red Wolves – Southeastern United States

- The red wolf, *canis lupus rufus*, was listed under the Endangered Species Preservation Act in 1967.³² A captive breeding population was established with wolves from Texas and Louisiana in 1974 and the red wolf was declared extinct in the wild in 1980.³³
- Reintroduction of red wolves as a nonessential experimental population began in 1987. According to the rule, FWS planned to release between 10 and 12 wolves from the Red Wolf Captive Breeding Program onto federal land at the Alligator River National Wildlife Refuge in North Carolina. In its rule, FWS also acknowledged that red wolves may stray from federal property and declared its intent to recapture the red wolves and return them to federal land.³⁴
- In 1995 FWS published an additional rule to expand the North Carolina recovery area to include a total of five counties. The new rule allowed red wolves to remain on private land unless the landowner specifically requested removal.³⁵ Private landowners called for scrutiny of the program after instances in which FWS released wolves on private property or refused to remove wolves from private property.
- The Wildlife Management Institute (WMI), a nongovernmental organization, was commissioned by FWS to evaluate the program in 2014 after FWS noted a significant decline in the number of red wolves in North Carolina. WMI found that FWS did not comply with its 1986 rule by exceeding the number of wolves released, and by releasing them on private property. It also found that the habitat needed for the species to recover

³⁰ See, Rebecca Moss, *Rep. Pearce Adds Amendment That Would End Wolf Recovery Program to \$32b Spending Bill*, SANTA FE NEW MEXICAN, July 14, 2016, at http://www.santafenewmexican.com/news/local_news/rep-pearce-adds-amendment-that-would-end-wolf-recovery-program/article_27ba4ea4-3841-544b-89dc-0163b1c98167.html.

³¹ U.S. DEPARTMENT OF THE INTERIOR OFFICE OF INVESTIGATOR GENERAL, INVESTIGATIVE REPORT OF THE U.S. FISH AND WILDLIFE SERVICE'S MEXICAN GRAY WOLF PROGRAM (2016) (available at: https://www.doi.gov/sites/doi.gov/files/MexicanGrayWolfProgram_Public.pdf)

³² Endangered Species Preservation Act of 1966, Pub. L. No. 89-669 (1966).

³³ U.S. Fish and Wildlife Service, *Red Wolf Recovery Timeline*, U.S. FISH AND WILDLIFE SERVICE (SEPT. 16, 2016, 12:42 PM) <https://www.fws.gov/redwolf/timeline.html>.

³⁴ Endangered and Threatened Wildlife and Plants; Determination of Experimental Population Status for an Introduced Population of Red Wolves in North Carolina, 51 Fed. Reg. 41790 (Nov. 19, 1986) (available at: http://ecos.fws.gov/docs/federal_register/fr1195.pdf).

³⁵ Endangered and Threatened Wildlife and Plants; Revision of the Special Rule for Nonessential Experimental Populations of Red Wolves in North Carolina and Tennessee, 60 Fed. Reg. 18940 (Apr. 13, 1995) (available at: <https://www.gpo.gov/fdsys/pkg/FR-1995-04-13/pdf/95-9291.pdf>).

was severely underestimated by FWS and that FWS could not adequately explain the declining population numbers, nor control for wolf-coyote hybridization.³⁶

- The OIG released a report on the FWS Red Wolf Recovery Program on February 24, 2016. The OIG found that FWS violated its rule by releasing 132 wolves into the wild between 1987 and 2013, when it had only provided for the release of 12 wolves.
- OIG also found that FWS released wolves on private property without the written permission of landowners.³⁷ OIG also found that FWS did not conduct any consultations for the additional wolf releases as required under Section 7 of the ESA, or any required NEPA assessments.³⁸
- On September 12, 2016, FWS announced that it had completed a “comprehensive review” of the red wolf program, and that the 30-year program had, for all intents and purposes, failed. The wolf population in North Carolina is unsustainable under existing circumstances.³⁹
- Among the program failures, FWS admitted that it could not control for coyote-wolf hybridization which is an existential threat to the wolf, that it had not accurately estimated the habitat needed for a sustainable wolf population, that it had failed in its duty to inform and involve the residents and the State of North Carolina in its recovery program, that it could not contain wolves to federal lands, and that its breeding stock was severely underpopulated.⁴⁰
- FWS also conceded that there was a lack of scientific consensus about the genetics of the wolf and whether it is even a listable entity under ESA, as well as scientific disagreement about its historic range.⁴¹
- FWS intends to scale back the wolf recovery program in North Carolina – shifting the approximately 45-60 wolves currently roaming in five counties to federal property in Dare County. Meanwhile FWS intends to **nearly double** the breeding stock from 29

³⁶ See, Wildlife Management Institute, Inc., *A Comprehensive Review and Evaluation of the Red Wolf (canis rufus) Recovery Program* (2014) (available at: <https://www.fws.gov/redwolf/reviewdocuments/WMI-Red-Wolf-Review-FINAL-11142014.pdf>).

³⁷ U.S. DEPARTMENT OF THE INTERIOR, OFFICE OF INSPECTOR GENERAL, INVESTIGATIVE REPORT OF THE U.S. FISH AND WILDLIFE SERVICE’S RED WOLF RECOVERY PROGRAM (2016) (available at: https://www.doioig.gov/sites/doioig.gov/files/FWS_RedWolfRecoveryProgram_Public.pdf).

³⁸ *Id.* at 3.

³⁹ See, Memorandum from the U.S. Fish and Wildlife Services Assistant Regional Director for Ecological Services Southeast Region to the Regional Director Southeast Region (Sept. 12, 2016) (available at: <https://www.fws.gov/redwolf/docs/recommended-decisions-in-response-to-red-wolf-recovery-program-evaluation.pdf>), and Telephone Call with Cindy Dohner, Regional Director of Southeast Region U.S. Fish and Wildlife Service (Sept. 12, 2016), and U.S. DEPARTMENT OF THE INTERIOR, U.S. FISH AND WILDLIFE SERVICE, RED WOLF RECOVERY TEAM RECOMMENDATIONS (2016) (available at: <https://www.fws.gov/redwolf/docs/red-wolf-recovery-team-recommendations-facilitated-by-group-solutions-inc.pdf>).

⁴⁰ *Id.*

⁴¹ *Id.* See also, Kerry Halladay, *Investigating the Wolves that Aren’t*, WESTERN LIVESTOCK JOURNAL, Aug. 12, 2016, at <https://wlj.net/article-permalink-13195.html>, and Matthew Cronin et. al., *Single Nucleotide Polymorphism (SNP) Variation of Wolves (Canis Lupus) in Southeast Alaska and Comparison with Wolves, Dogs, and Coyotes in North America*, 106 JOURNAL OF HEREDITY 26-36, (2015) (available at: <https://www.uaf.edu/files/snre/Publications/Cronin/Cronin-et-al-Wolf-coyote--dog-SNP-variation-JOH-2015.pdf>).

breeding pairs and approximately 200 wolves to a minimum of 52 breeding pairs and approximately 400 wolves.⁴²

- Surprisingly, FWS intends to identify new locations for reintroduction, anywhere in the region stretching from Texas to Pennsylvania and the Atlantic coast. This reintroduction would occur without consensus as to the genetic listability of the species, or definitive answers about its historic range.
- Reintroduction also could occur without an effective plan to prevent coyote-wolf hybridization and infringement of the wolves onto private property.
- FWS also announced that it intends to manage the captive population under the umbrella of the nonessential experimental population. When asked by Committee staff about how such an arrangement could occur, FWS did not answer and instead mentioned that details would be the subject of a forthcoming rulemaking. FWS also mentioned that it somehow intends to give the captive breeding population a “wildlife experience” but did not share details of what such a “wildlife experience” would entail.⁴³

⁴² Telephone Call with Cindy Dohner et. al., Regional Director, Southeast Region U.S. Fish and Wildlife Service (Sep. 12, 2016).

⁴³ *Id.*