

The Rewilding Institute

POB 13768, Albuquerque, NM 87192 *
TRI@rewilding.org www.rewilding.org

Comments of:

DAVID R. PARSONS

At

Meeting of the Mexican Wolf Adaptive Management Working Group,
Silver City, New Mexico, January 27, 2005

Note: Due to the format of the meeting, comments were taken in a piecemeal fashion. The entirety of the comments below were not delivered verbally.

Thank you for this opportunity to comment on the completed 5-year review document, its recommendations, and more recent developments in the Blue Range Reintroduction Project.

First, I commend the IFT for producing a comprehensive technical assessment of the project's progress and results through calendar year 2003; and the AMOC on producing a comprehensive compilation of the 5-year review process. However, I request that in future documents of this nature comments be consolidated to eliminate redundancy in the agencies' responses. This would save a lot of paper.

Following a comprehensive review of the document, an overarching concern is that the recommendations are long on process and procedure and short on immediate actions to increase survival and population expansion of the reintroduced population of Mexican wolves. Of 37 recommendations put forth in the review, NOT A SINGLE ONE will increase the odds of survival and persistence in the wild for a Mexican wolf for the next 2-3 years or longer! NOT A SINGLE ONE! In addition, Recommendation #14 calls for the AMOC to complete a detailed plan between now and the end of 2006 for the next Reintroduction Project Review. It astonishes me that the AMOC assigns a higher priority for planning the next review (December 15, 2006) than to draft a recommendation for a rule change that would actually improve the chances for reintroduction success (Recommendation 1; March 31, 2007). This suggests seriously misplaced priorities to me.

I note, with little comfort, that buried deep with responses in the public comments section that AMOC does acknowledge that the Project's legally mandated objective is "to help recover the Mexican wolf pursuant to the ESA..." (ARPCC-15, #43.); that "recovery requires growth in the wild population." (ARPCC-84, #310); and that "AMOC's intent is to further recovery of the Mexican wolf, pursuant to the ESA..." (ARPCC-197, #26). Actions to date do not portray a compelling commitment to recovery as the primary legally mandated objective.

Given AMOC's acknowledged understanding of its legally mandated objective pursuant to the ESA, it is unfortunate, and inexcusable, that in the 2 years spent conducting and completing the 5-year review, the wild population of Mexican wolves has consistently declined. Ironically, these are the first two years of operation of the AMOC. Official population count figures for 2003 (the last year covered in the 5-year review), 2004, and 2005 are: 55; 44-48; and 35-49. In addition, the number of breeding pairs has declined to only five at the end of 2005. In contrast, objectives set forth in the FEIS for this point in the project (end of year 8) were a population of 83 wolves with 15 breeding pairs.

With regard to the claim of 5 breeding pairs at the end of 2005, I have a concern, a question, and a request. My concern is that the IFT report covering the month of December 2005 reported that only 3 breeding pairs were confirmed at the end of that reporting period (i.e., December 31, 2005). This result is based on the entirety of field monitoring since pups were born in April or May. On page TC-6 of the 5-year review it states that counts of pups are based on the latest date in the year that pups are verified, but prior to October because "they become less distinguishable from uncollared subadult and adult wolves after that." Apparently, 2 additional breeding pairs were confirmed on the basis of aerial reconnaissance conducted in January 2006. **My question is: On what evidence were the additional 2 breeding pair determinations made? And my formal request is that AMOC make public all the evidence, procedures, interpretations of observations, and analyses used to confirm the 2 additional breeding pairs in January 2006.**

I strongly disagree with Recommendation #11, in which the AMOC recommends a cap of 125 wolves in the Mexican Wolf Experimental Population Area (MWEPA). The MWEPA is substantially larger than the BRWRA, which has an established objective of "at least" 100 wolves, with no stated cap. And AMOC is exploring the idea of expanding the MWEPA boundaries to some unspecified extent. Theoretical analyses based on the estimated prey biomass of the BRWRA suggest that it, alone, could support 213-468 wolves (see TC-18). Recommendations regarding population size fall clearly within the purview of the Recovery Team, not AMOC. Furthermore, a population of 125 Mexican wolves would most certainly have an effective population (N_e) of <50 wolves, likely much less. Most, if not all, conservation biologists would agree that a population this small would have a high probability of extinction (i.e., not viable over the long term) and would not be an appropriate recovery goal. **Does anyone on the AMOC disagree with this assessment?**

In light of the gross inappropriateness of Recommendation #11 on policy, procedural, and scientific grounds, I formally request that AMOC rescind this recommendation.

Recommendation #11 provides a clear illustration of the failure of AMOC to apply sound science within the adaptive management process. The Rewilding Institute commented on the misapplication of the adaptive management process by AMOC in our comments on the 5-year review. No response to our comment was provided in the final review document. However, I note that Recommendation #16 establishes a science and research advisory group with a project review mission. I sincerely hope (and strongly recommend) that AMOC will use this group to ensure that the adaptive management process is founded on sound science.

The 5-year report states on page AC-42 that “[c]ompliance with applicable rules and mandates is a continuing responsibility of all cooperating agencies in the AMOC. And in many places within the report it is clearly stated that the AMOC is bound by the legal provisions of the ESA. Section 10(j)(2)(A) of the ESA states that the release of an experimental population of an endangered species must “further the conservation” of such species. Nowhere in the 5-year review document does the AMOC acknowledge this ESA mandate. And, clearly, declining population and breeding pair trends over the past two years and the wide gap between predictions in the FEIS and results on the ground demonstrate that the conservation requirement is not being met. The Rewilding Institute raised this issue in its comments on the draft 5-year review and recommended that if the conservation mandate cannot be accomplished under the experimental non-essential classification (which it currently is not) that a revised rule be issued that reclassifies the BRWRA population of Mexican wolves as either “experimental essential” or “endangered.” Rather than offering a fact-based assessment of our claim that the conservation mandate was not being met, the AMOC simply responded that “None of the AMOC Lead Agencies support such an action.” Lack of support for a particular remedy to bring the project into legal compliance with the ESA is not a technically or legally sufficient response. **How does AMOC propose to immediately reduce the level of take currently occurring to bring the project into compliance with the conservation provision of section 10(j) of the ESA?**

I formally request that the AMOC immediately address this issue and within its deliberations it consider and discuss the merits of:

- 1. A moratorium on the taking of Mexican wolves on all public lands within the BRWRA until such time as the population reaches the 100-wolf objective for at least two consecutive years; or**
- 2. An emergency reclassification of the BRWRA Mexican wolf population as endangered until such time as the population reaches the 100-wolf objective for at least two consecutive years.**

Of course, these measures would be combined with an intensive effort to devise and implement measures to reduce wolf-livestock conflicts or to provide incentives for the

same purpose. Manpower formerly directed to controlling wolves could be redirected to proactive endeavors for protecting livestock.

I believe these measures are fully justified by the facts at hand and would spawn much need innovation to resolve the most pressing problems that are currently precluding recovery of Mexican wolves in the BRWRA.

I have additional concerns regarding the content of the 5-year review that I have not had time to fully formulate. I may provide these the AMOC in the form of written comments.

Thank you for this opportunity to comment.