

# The Rewilding Institute

POB 13768, Albuquerque, NM 87192 \*  
[TRI@rewilding.org](mailto:TRI@rewilding.org) [www.rewilding.org](http://www.rewilding.org)

February 1, 2006

Dr. John Morgart  
Mexican Wolf Recovery Coordinator  
US Fish and Wildlife Service  
2105 Osuna NE  
Albuquerque, NM 87113

Mr. Terry Johnson  
Chairman  
Mexican Wolf Adaptive Management Oversight Committee  
Arizona Game and Fish Department  
2221 W Greenway Road  
Phoenix, AZ 85023-4399

Dear John and Terry:

This letter formalizes and expands upon comments I presented at the recent meeting of the Mexican Wolf Adaptive Management Working Group in Silver City on January 27, 2006.

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, The Rewilding Institute commends the Interagency Field Team (IFT) for producing a comprehensive technical assessment of the project's progress and results through calendar year 2003; and the Adaptive Management Oversight Committee (AMOC) on producing a comprehensive compilation of the 5-year review process, results, and recommendations.

We note that the AMOC acknowledges 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 by AMOC

to the success of the reintroduction project and 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 two years spent conducting and completing the 5-year review the wild population of Mexican wolves has consistently declined. 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.

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. In light of the documented population decline over the past two years, the recent disclosure that only five breeding pairs can be documented in the present population, and Terry Johnson's acknowledgement at the meeting that the population "is not moving forward", it is clearly time for the AMOC to advance recommendations and make decisions that will promote the growth and persistence of the Blue Range population of Mexican wolves immediately. Mexican wolves presently alive in the wild represent a substantial investment and invaluable assets in the recovery account for this endangered subspecies. It would be unconscionable, in our opinion, to allow this investment of living wild-adapted wolves to waste away further for the sake of more needless process when we know what needs to be done.

As an example, we note that Recommendation #14 calls for the AMOC to complete a detailed plan between now and the end of 2006 for the next Reintroduction Project Review. Another review is of little value and a waste of precious project resources until changes are implemented to address the results and recommendations of previous reviews and monitored to determine their effectiveness. We are astonished that the AMOC assigns a higher priority for planning the next review (December 15, 2006) than to drafting 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 and a recipe for continued failure to meet reintroduction objectives. Simply put, an average annual failure rate of 64% will result in continued population decline until the root causes of the failure rate are rectified. The high failure rate and recent population declines should be a "wake up call." Thus, removing the "boundary" rule and exploring and implementing measures to reduce wolf/livestock conflicts and reduce "take" authorized by the rule and/or program SOPs should be the highest priorities of the AMOC at the moment.

The Rewilding Institute requests and urges the USFWS to charge the AMOC to review and revise its recommendations in such a way that immediately addresses known project failures to bring the project into compliance with the ESA.

We 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). Expanding a reintroduction goal that can and should be met within the BRWRA to the much larger MWEPA is inappropriate and not supported by the ESA or any authorized project document. 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 an effective population this small would have a high probability of extinction (i.e., not be 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, we 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. We found no response to our comment in the final review document. However, we note that Recommendation #16 establishes a science and research advisory group with a project review mission. We 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 “[n]one 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?

We formally request that the AMOC immediately address this issue and consider emergency provisions that will substantially reduce or eliminate the take of Mexican wolves until such time as the population reaches the 100-wolf objective for at least two consecutive years.

These provisions should 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.

We believe these measures are fully justified by the facts at hand and would spawn much needed innovation to resolve the most pressing problems that are currently precluding re-establishment of Mexican wolves in the BRWRA.

Thank you for this opportunity to comment.

Sincerely,

David R. Parsons  
Carnivore Conservation Biologist