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Scientific Case Against Moratorium and Control SOP 13

Project monitoring and both external (3-year) and internal (5-year) expert review provide hard evidence that the Mexican wolf reintroduction project on the Blue Range Wolf Recovery Area is not meeting recovery objectives and is at risk of failure. Some key findings are as follows:

- Frequent recaptures and re-releases may be interfering with pack formation and establishment and maintenance of home ranges.
- Survival and recruitment rates are far too low to ensure population growth and persistence. The average annual failure rate of collared wolves is an unsustainable 62%.
- The average litter size for wild-conceived and wild-born pups was 2.1 pups/litter ($n = 16$, range 1-5), far below that observed in other populations and the projections in the EIS.
- Many packs had a portion of their home range outside of the current reintroduction boundary. Dispersal of wolves outside the recovery area boundaries is required if the regional population is to be viable.
- On average, for every confirmed depredation incident, a wolf was removed from the wild or translocated.
- 91% of wolves known to have scavenged dead livestock carcasses were confirmed to have subsequently killed living domestic livestock.
- Genetic ancestry from two (Aragon and Ghost Ranch) Mexican wolf founding lineages is significantly underrepresented in the wild population, threatening its long-term viability.

Authorizing documents mandate the use of “Adaptive Management” as a decision-making tool for this project. Adaptive Management is a formal process that treats past actions as scientific experiments and applies the results of monitoring and scientific analysis to future decisions. These decisions are informed by agency policy directives and stakeholder concerns through the deliberations of the Adaptive Management Oversight Committee. The Endangered Species Act mandates the use of best available science for making decisions affecting the recovery of endangered species.

Monitoring results and the findings and recommendations of technical review when considered under an adaptive management process argue for project modifications that would: 1) reduce wolf recaptures, 2) reduce wolf removal rates, 2) reduce wolf mortalities, 3) reduce wolf-livestock conflicts, 4) reduce disturbance of wolves by management activities, 5) expeditiously increase genetic representation of Aragon and Ghost Ranch lineages in the wild population 6) increase number of packs successfully breeding in the wild, 7) increase litter size, 8) remove barriers to wolf movements, and 9) allow wolves to be released throughout the recovery area.

The proposed moratorium and SOP 13 accomplish none of these objectives. The proposed moratorium is an admitted result of political pressure applied to high-ranking regional FWS officials, and the proposed SOP 13 potentially increases lethal take or removal of wolves and does nothing to address the critical issues listed above. The AMOC has ignored science and rewarded political meddling.