



April 17, 2006

Mexican Wolf Recovery Coordinator
New Mexico Ecological Services Field Office
2105 Osuna NE
Albuquerque, NM 87113

RE: AMOC recommendations of the 5-Year review

Thank you for the opportunity to comment. Wolf Haven International is a non-profit wolf sanctuary and conservation organization located in Washington state. We have been a member of the Mexican Wolf SSP since 1995 and we are one of the three U.S. pre-release facilities for the recovery program. Both the original Hawks Nest pack and the Cienega pack were acclimated at our facility.

Wolf Haven commented extensively on the 5-year review to the AMOC during their comment period. We will limit this comment to a few specific recommendations put forth by the AMOC.

Number 5: Look into expanding the MWEPA and allowing wolves to disperse beyond the boundaries of BRWRZ. Wolf Haven is in favor of these recommendations. The reasons for allowing wolves to disperse outside the BRWRZ have been well documented, particularly in the 3-year review.

Number 7: Creating a BRWRZ out of the current primary and secondary zones of the BRWRA and the FAIR and allowing primary releases and translocations throughout is another recommendation consistently asked for, again, with well documented reasons. Wolf Haven supports this recommendation.

Number 10: Issue permits to private individuals to use authorized non-lethal means to harass wolves engaged in nuisance behavior or livestock depredation, or attacking domestic pets. Wolf Haven supports non-lethal harassment under the specified conditions with the addition that any incidents are reported to program officials within a specified time. Allowing lethal take of wolves in the act of attacking a dog is an understandable desire. It is an option, however, that as written, could easily be abused. If lethal take of wolves is to be allowed under these circumstances, prompt reporting, thorough investigation and physical evidence must be required.

Number 11: Allowing take under a variety of circumstances once the wolf population has reached 125 for at least two sequential years. We see a range of problems with this recommendation. Using the number of individual wolves to determine the vitality of the population rather than judging population stability by the number breeding pairs or even the number of packs may be inappropriate. There is a good reason that most wolf management decisions in the U.S. have been predicated by breeding-pair numbers rather than number of individual wolves. If, for instance, primarily alpha wolves are removed from the population due to depredations or to help wild ungulate populations, even though the numbers of wolves could initially remain above "management objectives", pack cohesion and breeding success could be significantly impacted. Future success of the population may be imperiled if **breeding-pair** numbers are not sustained at a certain level.

b. Allowing "private individuals to take as many wolves as necessary" is a highly subjective statement and open to a wide array of interpretations. This part of the recommendation also does not specify on what type

of land "take" will be allowed, i.e. private or public or if "take" must be by landowners, permittees or their agents. This section needs significant clarification before comments can be made.

c. Needless to say, "unacceptable impacts" needs to be well defined before any significant comment can be made on this recommendation.

The leniency of management outlined in this recommendation was not allowed in the Northern Rocky Mountain wolf population until the wolf population had almost doubled well-specified **recovery** goals and of a sub-species that, while endangered in the region, is well represented in North America. Due to the rarity of the Mexican wolf sub-species, any loss of genetic diversity may be permanent. The limited success of this program has, so far, not shown any room for liberal lethal control. The recommendations in this section seem premature considering the lack of an up-to-date Mexican Wolf Recovery Plan that includes well-defined population recovery goals.

Number 12: Regarding financial incentives to address nuisance and depredating wolves. Compensation for depredation has been a key component to the success of wolf recovery in the United States. Wolf Haven strongly encourages this investigation with particular attention paid to the issue of dealing with carcass discovery, monitoring, removal, burial and/or destruction as there has been a strong correlation with scavenging activities and subsequent depredations. We are also in favor of possible compensation to landowners and permittees with documented presence of wolves and those that employ ranching techniques designed to deter predation. Without getting into the grazing issue, however, we are flatly against any modification of grazing fees to buy tolerance or to compensate for "undocumented losses" in the entire MWEPA.

Number 13: Convening a stakeholder group to assist with development a new MWEPA boundary is a good idea, however, given the potential conflict among the variety of potential stakeholders, it could take a considerable amount of time to come to a consensus. If any boundary decision will require a consensus of a stakeholder group, a timeline for completion should be set and enforced.

Wolf Haven International,
Tami Williams
Director of Conservation