

Wolf Haven International
3111 Offut Lake Road
Tenino, WA 98589
800-448-9653
360-264-4695
fax: 360-264-4639



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U.S. Fish and Wildlife Service
New Mexico Ecological Services Office
2105 Osuna NE
Albuquerque, New Mexico 87113

RE: Comments on the 5-year review of the Mexican Wolf Recovery Program.

Thank you for the opportunity to comment. Wolf Haven International is a small 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.

There are a number of critical aspects of the 5-year review that Wolf Haven has specifically chosen to comment on. We have responded to the recommendations as listed in the administrative portion of the 5-year review.

Immediately modify the final rule to allow wolves that are not management problems to establish territories outside the BRWRA

One of the most consistent recommendations for modifying the Final Rule – aimed at the overall success of the program - has been to remove the restriction requiring non-problematic wolves that linger outside the BRWRA to be captured. The technical section of the 5-year review reiterates this point: “Thus, we recommend that the project modify the final non-essential experimental rule to allow wolves to occur in areas within the southwestern distinct population segment (SWDPS) of the gray wolf where they do not conflict with livestock or humans.”

The proposed change has been discussed extensively in program literature and documents. The technical section points out that dispersal outside the BRWRA will increase with a larger wolf population and with more wild-born pups achieving the age when many wolves disperse. One telling statistic suggests that if a lone (dispersing) wolf travels the average distance noted, and starts at the center of the BRWRA, 66% of the time it will end up outside the BRWRA boundaries.

The administrative section reiterates two of the biggest concerns: "...it hinders the natural dispersal and recolonization of wolves into new areas, thereby slowing recovery" and "...presents serious logistical and staffing concerns since it necessitates the IFT to spend numerous hours and resources removing otherwise non-problematic wolves".

The administrative portion of the 5-year review provides many justifications for why this change has not been implemented and Wolf Haven has serious concerns about the justifications for not immediately modifying this rule.

Potential problems could arise by putting off the decision for a rule change pending the recommendations of the SWDPS Recovery Team. As the reclassification Final Rule was rescinded in January, we would assume that, at this point, the SWDPS no longer legally exists. Barring a challenge to Judge Jones' decision, it could take years for a new reclassification to be proposed and finalized. What is the status of the recovery team and their plan? Even if it is still active, we would assume a significant modification would be required in developing a recovery plan, as the geographic area effected by the plan is now technically undefined.

If, as the 5-year rule implies, further NEPA analysis and experimental population rule revisions would be required to change this portion of the final rule and a decision to initiate the rule change is waiting for a new recovery plan (which must be delayed at best), several years could pass before this important change occurs. It seems to be the consensus of all experts that not modifying this rule could hinder the success of the program. If a rule change will take considerable time, the sooner the process begins, the sooner it can be implemented. Wolf Haven strongly recommends that this process begin immediately.

The administrative portion also refers to a potential financial incentive for landowners and permittees who might be negatively impacted by a rule change that would allow wolves to naturally disperse outside the primary and secondary recovery zones. Recognizing the importance of stakeholder opinion and the need for their tolerance, Wolf Haven would be in favor of investigation into such an incentive program. However, given the current financial difficulties of the program as stated in #2 of the administrative portion of the review, Wolf Haven believes that such a financial incentive program would undermine the prudent use of limited funds.

Immediately modify the final rule and develop authority to conduct releases in the Gila National Forest.

Like the BRWRA boundary restriction, this issue has had a consensus from experts, almost since the inception of the program, some of which the administrative portion of the 5-Year Review outlines:

"The Gila National Forest makes up approximately 75% of the BRWRA and contains much of the best wolf habitat due to the existence of some areas with low or no road

densities, good populations of large native ungulates (primarily elk), and no permitted livestock. Currently, the Service is limited to releasing (translocating) only wolves that have had previous wild experience into New Mexico. This restricts the pool of available release candidates and limits the Service's ability to release wolves for management purposes, such as replacement of lost mates or genetic augmentation. The ability to genetically augment the wild population with wolves that are genetically underrepresented is important in order to increase the overall fitness of the population, thereby aiding recovery of the species."

Wolf Haven, again, has concerns about the justifications for not implementing this change.

Previously, the Regional Director and the Mexican Wolf Recovery Coordinator prioritized and started the process for this rule change. With the turn-over of these key positions, the priority for the recovery program shifted. While the recent focus for Mexican wolf recovery seems to have been on creating delisting criteria, stated in the administrative section as the Regional Director's "first priority," the wolves are less likely to achieve any acceptable levels given the restriction of no primary releases in New Mexico. **Establishing delisting criteria cannot be as important as meeting delisting criteria.**

Our comments about the status of the SWDPS recovery team and its new recovery plan apply as much to this section as they do to the above. Even if the SWDPR recovery team is still active, requiring a consensus (as stated by the Regional Director) of a team comprised of groups and individuals with very diverse interests and agendas will slow the process at best.

The emphasis of this recommendation is "**immediately.**" While the process of changing this rule may not be as time-consuming as dealing with the boundary issue, it will still take considerable time. Some aspects of reintroduction management, such as the ability to genetically manage the wolf population, may be time-sensitive.

In light of the New Mexico Game Commission's motion which, in part, states "to provide for direct releases into appropriate area(s) of New Mexico," one of the largest political barricades to a rule change seems to have been reduced. Waiting for the recommendation of the SWDPS recovery team may not be in the best interests of a successful reintroduction. Wolf Haven strongly recommends an immediate initiation to modify this rule to allow primary releases throughout the BRWRA.

Require livestock operators on public land to take some responsibility for carcass management/disposal to reduce the likelihood that wolves become habituated to feeding on livestock.

According to the Service's numbers, while about 50% of depredations are caused by scavengers, about 90% of scavengers become depredators. Therefore, to say that "clear trends either way are difficult to determine", based on the 50% figure, seems to be very

misleading. Is it possible that those 22 wolves that scavenged on livestock carcasses would have never become depredators had they not had the chance to scavenge first? While we accept that management of livestock herds on large grazing allotments can be challenging, shouldn't permittees be required to be good stewards of public land? In reality, without a change in the law, permittees do not have an incentive to deal with carcasses.

Like adaptive management, innovative solutions should be investigated for the carcass issue. A partnership among ranchers, the agencies and conservation organizations is a possible means to a solution. Perhaps a paid employee, funded by the Forest Service, the BLM, or even the states to deal with carcasses on public lands should be investigated. A volunteer program similar to the "Wolf Guardians", started by Defenders of Wildlife, used in the Rockies to minimize wolf/livestock conflicts, could potentially be adapted to deal with carcasses. Or simply an educational program, such as a brochure on how to make carcasses inedible, distributed by federal or state agencies that come into contact with ranchers on a regular basis, such as the Soil and Water Conservation District or the Natural Resources Conservation Service.

The Mexican wolf recovery program has faced many challenges from its inception. Despite these challenges, there are wolves once again in the wilds of the Southwest. The ultimate goal for all parties is to have Mexican gray wolves taken off of the Endangered Species list. After 25 years of captive breeding and 7 years of reintroduction, countless resources have been invested in the recovery. We have a responsibility, both financially and under the auspices of the ESA to do everything possible to ensure the program's success.

Again, thank you for the opportunity to comment.

For Wolf Haven International,

Tami Williams
Director of Conservation