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Mexican Wolf Reintroduction Project
c/o Arizona Game and Fish Department
2221 West Greenway Road
Phoenix, Arizona 85023-4399

Re: Response to proposed 1-year moratorium on new releases

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.

Disregarding the process by which this proposal was made, we have some serious concerns regarding the proposed 1-year moratorium.

The EIS predicted that by the end of 2004, there would be 68 wolves in 13 packs. These numbers were to have been achieved with only two years of initial releases. The actual numbers were approximately 48 wolves in 11 packs or groups – with new releases every year. The technical portion of the 5-year review shows lower than expected litter sizes, much higher than expected removal rates, and the fact that releases have continued for many years beyond what was estimated in the EIS – it appears the wolves are having a difficult time maintaining the population on their own.

Basically, the effect of a moratorium would be what has happened within the secondary recovery zone, New Mexico, since the inception of the program: no primary releases. The following excerpt is from the 5-year review:

“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.”

Experts have been fighting to change the Final Rule to allow primary releases throughout the BRWRA since the reintroduction began for the reasons clearly outlined above. To impose the same restriction throughout the recovery zone may seriously hinder the program.

According to Figure 4B in the technical portion of the 5-year review, the breeding pair figure appears to be below six. As breeding pair status depends on the survival of at least two pups through December 31 of the year they were born, it can be assumed that the number for 2005 is not yet known. From what can be gleaned from the field reports, it appears that the population may not end up with six breeding pairs this year. Not only would that rescind the moratorium, but it demonstrates how very vulnerable the population would be without the option to reintroduce more wolves as needed.

Under the ESA, it is the responsibility of the U.S. Fish and Wildlife Service to conserve the species. Adaptive management is important in controversial programs like wolf reintroduction – but not to the point of the demise of a program. After 25 years of captive breeding and 7 years of reintroduction, countless resources and man-hours have been invested in this program. It is the ultimate goal of all parties involved to remove the Mexican wolf from the Endangered Species list. This will never happen if program management is motivated by politics rather than science.

For Wolf Haven International,

Tami Williams
Director of Conservation