



American  
Society of  
Mammalogists



Society for Conservation Biology

September 22, 2014

Division of Policy and Directives Management  
U. S. Fish and Wildlife Service Headquarters  
MS: BPHC  
5275 Leesburg Pike  
Falls Church, VA 22041-3803

Public Comments Processing, Attn: Docket No. FWS-R2-ES-2013-0056;  
FXES11130900000C2-134-FF09E32000

RE: Endangered and Threatened Wildlife and Plants; Proposed Revision to the  
Nonessential Experimental Population of the Mexican Wolf

On behalf of the Society for Conservation Biology's North America Section (SCB-NA),<sup>1</sup> and the American Society of Mammalogists (ASM),<sup>2</sup> we are writing to comment on the Proposed Revision to the Nonessential Experimental Population of the Mexican Wolf (henceforth "proposed rule").<sup>3</sup> SCB-NA and ASM have a long history of involvement in carnivore science and conservation, including conservation of the Mexican Wolf (*Canis lupus baileyi*). In 2007, ASM members passed a resolution requesting that the US Fish and Wildlife Service ("Service") expedite the process of revising the Mexican wolf recovery plan to ensure the recovery and sustainability of populations of Mexican gray wolves.<sup>4</sup> In 2009, the ASM followed up on its 2007 resolution by asking the Department of Interior to expedite the revision of the 1982

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<sup>1</sup> The Society for Conservation Biology (SCB) is an international professional organization whose mission is to advance the science and practice of conserving the Earth's biological diversity, support dissemination of conservation science, and increase application of science to management and policy.

<sup>2</sup> The American Society of Mammalogists (ASM) was established in 1919 for the purpose of promoting interest in the study of mammals worldwide. ASM has long provided information for public policy, education and resources management, and we strongly support the conservation and responsible use of wild mammals based on current, sound, and accurate scientific knowledge.

<sup>3</sup> *Proposed Revision to the Nonessential Experimental Population of the Mexican Wolf*. 79 Fed. Reg. 43358 (July 25, 2014).

<sup>4</sup> American Society of Mammalogists [ASM]. 2009. Letter to USFWS Concerning a Resolution on the Reintroduction and Conservation of the Gray Wolf in the Southwestern United States.

recovery plan and to identify additional recovery areas for the Mexican wolf. Similarly, in December 2007, SCB-NA submitted comments recommending alternative management approaches for Mexican wolves as potential modifications of the existing regulatory framework, focusing in particular on the urgent need for a revised recovery plan. In November 2010, SCB-NA repeated its request to the agency to expedite development of a recovery plan.<sup>5</sup> In June 2012, SCB-NA and ASM, along with the Society for Ecological Restoration (SER), jointly requested that the Service resume the suspended recovery planning process for the Mexican wolf.<sup>6</sup>

Considering the proposed rule in the context of this history, we support those aspects of the proposed rule that implement management changes long recommended by scientists (e.g., see review of Mexican wolf recovery program by Paquet et al. [2001]).<sup>7</sup> These measures include expansion of the area to which wolves can be released, as well as of the area to which wolves can disperse and establish new packs. These changes are essential initial steps in addressing some of the key factors (e.g., low population size and genetic inbreeding) currently preventing recovery of the subspecies in the wild. However, these beneficial changes outlined in the proposed rule will not be sufficient to address the factors placing the wild population at risk of extinction. In addition, several other aspects of the proposed rule (as discussed below) are problematic, and may augment the risks facing the population.

Firstly, the proposed rule indicates that the Service plans to issue a permit under section 10(a)(1)(A) of the Endangered Species Act to allow “capture and... return to the MWEPA [Mexican Wolf Experimental Population Area], or transfer to captivity or Mexico, any wolves that have dispersed from the experimental population and that establish wholly outside of the MWEPA in Arizona, New Mexico, Texas, Colorado, [or] Utah”.<sup>8</sup> The ESA’s Section 10(a)(1)(A) specifies that such permits are intended to permit scientific research on or conduct activities to enhance the propagation or survival of an ESA listed species. However, recent scientific studies have suggested that recovery of the subspecies will necessitate establishment of a metapopulation, which will require access to habitat outside the current boundaries of the MWEPA, specifically in the region surrounding the Grand Canyon in northern Arizona and southern Utah, and in the southern Rocky Mountains of northern New Mexico and southern Colorado (Figure 1).<sup>9</sup> Analysis of historical and ancient DNA supports the conclusion that wolves genetically similar to *C. l. baileyi* once inhabited these areas.<sup>10</sup>

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<sup>5</sup> Society for Conservation Biology, North America Section [SCB-NA] 2007. Comments on the Scope of the EIS and Socio-Economic Assessment for the Proposed Amendment of the Rule Establishing a Nonessential Experimental Population of the Arizona and New Mexico Population of the Gray Wolf.

<sup>6</sup> SCB-NA, ASM, and Society for Ecological Restoration. 2012. Comments on Recovery Planning for the Mexican Wolf.

<sup>7</sup> Paquet, P.C., J.A. Vucetich, M.K. Phillips, and L.M. Vucetich. 2001. Mexican wolf recovery: three-year program review and assessment. Prepared by the Conservation Breeding Specialist Group for the United States Fish and Wildlife Service, Albuquerque, New Mexico. Apple Valley, Minnesota, USA.

<sup>8</sup> USFWS. 2013. Draft Environmental Impact Statement for the Proposed Revision To The Nonessential Experimental Population of the Mexican Wolf (*Canis Lupus Baileyi*), Appendix B. USFWS, Albuquerque, NM.

<sup>9</sup> Wayne, R., and P. Hedrick. 2011. Genetics and wolf conservation in the American West: lessons and challenges. *Heredity* 107:16–19; Carroll, C., R. J. Fredrickson, and R. C. Lacy. 2013. Developing Metapopulation Connectivity Criteria from Genetic and Habitat Data to Recover the Endangered Mexican Wolf. *Conservation Biology* 28:76-86.

<sup>10</sup> Leonard, J. A., C. Vila, and R. K. Wayne. 2005. Legacy lost: genetic variability and population size of extirpated US grey wolves (*Canis lupus*). *Molecular Ecology* 14:9–17.

Re-capture and translocation of wolves dispersing northwards into these areas would impede establishment of a metapopulation and thus impede recovery and delisting of the subspecies.

Secondly, the proposed expansion of situations in which “take” of Mexican wolves will be permitted may also impede recovery. For example, the rule proposes to allow employees of the federal USDA Wildlife Services program *carte blanche* for “take of a Mexican wolf that occurs while conducting official duties associated with predator damage management activities.” To support the increased levels of take, the Service on p. 35 of the Preliminary Draft EIS states that it “expect[s] that modifying the provisions governing the take of Mexican wolves will reduce the likelihood of indiscriminate, illegal killing of wolves and will substantially lessen the overall risk of human caused wolf mortality.” However, recent research on factors affecting human tolerance for carnivores<sup>11</sup> does not support the conclusion that the proposed expansion of allowable take will increase tolerance for and survival of Mexican wolves to an extent that would offset the direct negative effects of take on the wild population’s growth rate.

Reintroduced wolf populations in the Northern Rocky Mountains were able to maintain rapid population growth despite substantial anthropogenic mortality (e.g., in response to livestock depredation).<sup>12</sup> However, the wild Mexican wolf population has not proven to be resilient to anthropogenic mortality and removals.<sup>13</sup> For example, the SOP13 policy, which increased removals of depredating wolves during the period 2003-2009, coincided with a cessation of growth of the Mexican wolf population (Figure 1). Potential reasons for the lower resiliency of the Mexican wolf population as compared to Northern Rocky Mountain wolf populations include the presence of livestock in wolf habitat during a greater proportion of the year than occurs in the Northern Rocky Mountains, as well as decreased reproductive rate due to genetic inbreeding.<sup>14</sup> It is worth noting in this context that the Service authorizes take and removal of wolves without regard for their genetic significance to the population.

Finally, the Service is proposing changes to management of the Blue Range population without direction from any overarching roadmap to recovery, as embodied in a scientifically and legally sufficient recovery plan. The 1982 recovery plan lacks formal recovery criteria and thus cannot serve as a roadmap by which to gauge the efficacy of the management revisions contained in the proposed rule. Therefore, we reiterate the recommendation contained in our previous comments to the Service (in 2007, 2009, 2010, and 2012) that the Service expeditiously resume recovery planning and complete a recovery plan that contains recovery criteria that reflect current “best available” science.

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<sup>11</sup> Treves, A., L. Naughton-Treves, and V. Shelley. 2013. Longitudinal analysis of attitudes toward wolves. *Conservation Biology* 27: 315-323.; Treves, A. and J. Bruskotter. 2014. Tolerance for predatory wildlife. *Science* 344: 476-77.

<sup>12</sup> Smith, D. W., et al. 2010. Survival of colonizing wolves in the northern Rocky Mountains of the United States 1982–2004. *Journal of Wildlife Management* 74:620–634.

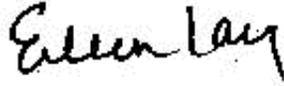
<sup>13</sup> Turnbull, T. T., J. W. Cain, and G. W. Roemer. 2013. Anthropogenic impacts to the recovery of the Mexican gray wolf with a focus on trapping-related incidents. *Wildlife Society Bulletin* 37:311–318.

<sup>14</sup> Fredrickson, R. J., P. Siminski, M. Woolf, and P. W. Hedrick. 2007. Genetic rescue and inbreeding depression in Mexican wolves. *Proceedings of the Royal Society B* 274:2365–2371.

Respectfully submitted,



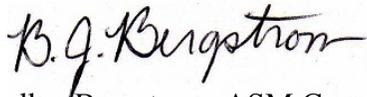
Carlos Carroll, President of SCB-NA



Eileen Lacey, President of ASM



Doug Parsons, SCB-NA Policy Director



Bradley Bergstrom, ASM Conservation Committee Chair

Figure 1. Potential habitat linkages between six existing or potential wolf-population core areas in the western United States. From Carroll et al. (2014).

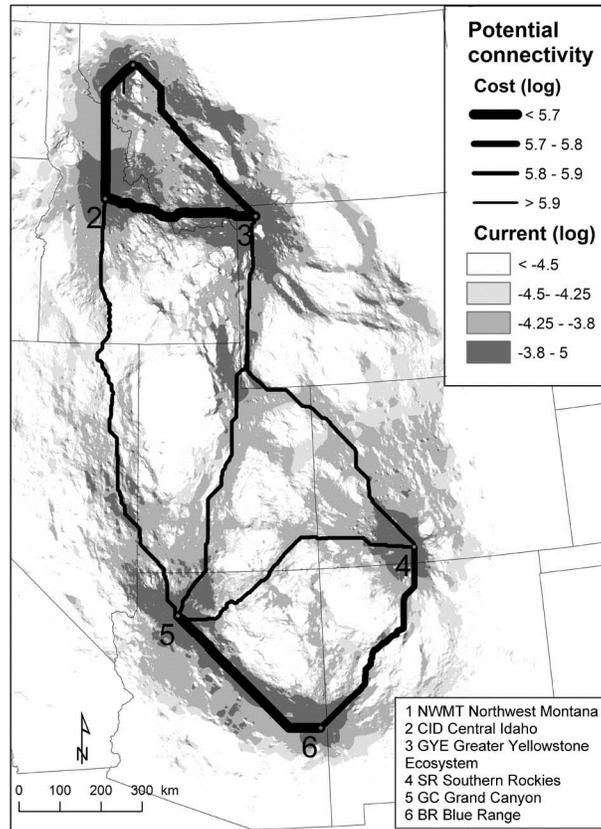


Figure 2. Predicted and observed population trends for the Blue Range Mexican wolf population. Data from USFWS (<http://www.fws.gov/southwest/es/mexicanwolf/documents.cfm>).

