

Mexican Wolf Project: Comment on SOPs  
Attention: Terry B. Johnson  
5000 West Carefree Highway  
Phoenix, Arizona 85086

May 16, 2008

Copy via email: [mexwolf@azgfd.gov](mailto:mexwolf@azgfd.gov)

Dear Mr. Johnson,

Please accept the following comments on the draft clarification memos for SOP 13 and 11, on behalf of the undersigned organizations.

We are gravely disappointed that the Mexican Wolf Adaptive Management Oversight Committee (AMOC), in the face of calls by the scientific community to cease removing wolves from the wild and a request by New Mexico Governor Bill Richardson to change SOP 13 -- not to mention two lawsuits challenging the legality of SOP 13 -- has chosen not to replace SOP 13 with a management plan that would contribute to recovery of Mexican wolves. Instead the AMOC has tinkered with a fundamentally flawed procedure that permits the second extinction of the Mexican wolf in the wild.

To recount, the American Society of Mammalogists, in June 2007, called for “suspend[ing] all predator control directed at Mexican gray wolves at least until the interim 100-wolf goal of the current reintroduction program has been achieved.”

The same month, nine scientists, including retired U.S. Fish and Wildlife Service Mexican Wolf Recovery Coordinator David Parsons, complained to the U.S. Fish and Wildlife Service that the recovery program has missed its goal of 102 wolves by nearly 50 percent. They blamed the failure on the high level of killing and removal by federal agents: “For the past four years growth of the wolf population has been limited by management-related killing or permanent removal of wolves.” Other eminent authors included Dr. Philip Hedrick, member of the Mexican gray wolf recovery team, and Dr. Paul Paquet of the University of Calgary, lead author of the government-authorized *Mexican Wolf Three-Year Review*.

In July 2007, Governor Richardson called for the “immediate suspension” of SOP 13 pending its ultimate revision.

In January 2008, the Association of Zoos and Aquariums, which manages the captive population of Mexican wolves, requested “a moratorium on lethal control and permanent removal (rescind or suspend SOP 13) of Mexican wolves in the Blue Range Wolf Recovery Area until an expert taskforce on genetic issues can be convened to provide guidance to these actions.”

The reintroduction program, and AMOC management, is premised on “adaptive management,” in which scientific information and data from the field is supposed to shape management. Yet even as the scientific community reaches unanimity that the data points to the urgent need for change, the AMOC’s decision to merely “clarify” SOP 13 (and its partner-protocol, SOP 11) is a parody of adaptive management.

The reintroduction goal of a viable, self-sustaining wild population of at least 100 Mexican wolves in the Blue Range Wolf Recovery Area, projected to be achieved by the end of 2006, along with eighteen breeding pairs, has not been met. Instead, the estimated population at the end of 2007 was 52 wolves and only three breeding pairs (using the Federal Register Mexican wolf reintroduction final rule's definition of breeding pair). The population has actually declined since the end of 2003, and the number of breeding pairs has not increased over this four-year period. The reason for the disparity between goals and results is the agency removal of wolves from the wild, largely authorized by SOP 13.

The clarification memos are deficient in several respects, first and foremost in ignoring the scientific consensus that removing wolves from the wild must cease. Nor do they address the severe demographic, genetic or wolf-social-structure impacts of removing wolves from the wild. They certainly do not modify SOP 13 in any way that promotes reintroduction objectives. And through maintaining a punitive and formulaic approach to deciding on wolf removals, they are antithetical to the principles of adaptive management.

Even in touching on a specific scientific recommendation for management that might preclude the supposed need to remove wolves, the clarification memos are more public relations documents than a substantive change from existing policy. The 2001 *Mexican Wolf Three-Year Review* (Paquet Report) recommended: "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." And the 2007 American Society of Mammalogists resolution recommended: "Protect wolves from the consequences of scavenging on livestock carcasses." The clarification memos, in contrast, state that if "intentional attraction or repeated knowing attraction of wolves contributed or likely contributed to causing a confirmed wolf depredation," then the wolves will not be penalized for that depredation. This is a completely unenforceable provision, which depends on managers' knowledge of livestock owners' intentions or of their awareness. The clarification does not nearly suffice to protect wolves from the consequences of scavenging on livestock carcasses.

In short, we request that these clarification memos not be approved, and that instead SOP 13 be rescinded and all removals of wolves from the wild be suspended at least until there are 100 wolves, including eighteen breeding pairs, surviving in the Blue Range Wolf Recovery Area.

Thank you for your consideration.

Sincerely endorsed by:

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