Benjamin N. Tuggle, Ph.D., Regional Director
U.S. Fish and Wildlife Service
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July 14, 2017

Via certified mail
Return receipt requested

Sherry Barrett, Mexican Wolf Recovery Coordinator
U.S. Fish and Wildlife Service
New Mexico Ecological Services Field Office
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And via email: sherry_barrett@fws.gov, benjamin_tuggle@fws.gov

Dear Regional Director Tuggle and Recovery Coordinator Barrett,

We request that the U.S. Fish and Wildlife Service ("Service") expeditiously release captive Mexican gray wolves into the wild and in particular into the Gila Wilderness and nearby national forest lands in New Mexico. We specifically and most urgently request the releases of two family packs that, in February, the Mexican Wolf Interagency Field Team recommended for release in June or July (i.e. *now*) to optimize chances for a successful transition into the wild.

In addition, because the field team's recommendation is inadequate to address the genetic crisis and other threats facing the Mexican wolf, we request the release of three additional family packs, and moreover -- because she represents a vital, natural genetic connection between wolves in the southwestern United States and in Mexico -- release as well of the wolf from Mexico who was captured this spring in Arizona.

Finally, we request that the Service immediately pair up as many compatible Mexican wolf pairs selected from the captive breeding facilities as the Sevilleta National Wildlife Refuge wolf-holding facility can accommodate, and transfer them there in preparation for releases next year.

Our request is based on the declining genetic condition of the sole U.S. wild population of this critically imperiled subspecies; the closing window of opportunity for genetic rescue of this population, which is vital to the survival and recovery of the entire subspecies; the closing seasonal window for releasing family groups this year; and the present distribution of wolves in relation to available habitat and prey. As explained below, we request releases of the following wolves into the following locations:

(A) Alpha female 1362, alpha male 1196, yearling pup f1494 and any associated pups into Lilley Park within the Gila Wilderness (per the Mexican Wolf Interagency Field Team's recommendation);
(B) Female 1323, male 1336 and any associated pups into Miller Springs within the Gila Wilderness (per the field team recommendation but in more propitious locale);
(C) Yearling female 1530, also known as "Sonora," a border-crossing wolf captured this spring near the Chiricahua Mountains in southeastern Arizona, into the vicinity of male

1569, apparently single, who has dispersed northeast of the established population to the San Mateo, Magdalena, Gallinas and Bear mountain ranges in the Cibola National Forest.

(D) An additional three male/female pairs (preferably with pups), to be selected in cooperation with biologists at the captive-breeding facilities participating in the Mexican Wolf Species Survival Plan, into (in the Gila National Forest) (1) Half Moon Park within the Gila Wilderness and (2) Meason Flat between the Gila and Aldo Leopold Wildernesses; and (3) San Mateo Canyon in the Apache Kid Wilderness (in the Cibola National Forest).

In support, we show below that the pace of wolf releases is inadequate to address the genetic crisis and that releases of family packs into and near to the Gila Wilderness and Apache Kid Wilderness offer the best chances of diversifying the U.S. wild population's gene pool and also broadening the population's distribution, which would further reduce the risk of extirpation. We also explain that release of "Sonora" or f1530 into the U.S. would benefit the wild U.S. population and moreover that failing to do so would undermine a key component of the Service's own recovery strategy.

But first, we urge you to act without further delay on two vital releases supported by the Mexican Wolf Interagency Field Team.

I. Timely Action Needed to Release Two Wolf Families as the Field Team Advised

In recommending the releases of two family packs into the wild this year, the Mexican Wolf Interagency Field Team advised for each: "The release would occur June – July. To the degree possible (dependent on pup age) the release should correspond with elk calving (~June 1) to facilitate natural hunting behavior."[1]

Please do not delay any further. At the very least, it is incumbent on the Service to give the two packs that the field team identified and recommended for release, as optimum a chance as possible for survival in the wild. Accordingly, we ask that regardless of consideration of our other requests, the Service follow the field team's recommendations and expeditiously release the pack consisting of AF1362, AM1196, f1494 and the alpha pair's pups if they have any, and separately release the mated pair consisting of F1323, M1336 along with their pups if any were born.

II. The Pace of Wolf Releases Is Inadequate to Address the Genetic Crisis

Just five months ago, the Mexican Wolf Interagency Field Team proposed "cross-fostering" captive-born wolf pups into as many as five wolf dens in the wild (and did not suggest any removals of pups to accompany the releases).[2] But, with the temporal window for cross-fostering neonatal pups now closed — and with just four captive-born pups implanted into two

[1] Mexican Wolf Experimental Population Area Initial Release and Translocation Proposal for 2017, Feb. 2, 2017, pp. 6, 7.
[2] Ibid, p. 5.

dens, and four wild-born pups removed from those dens and placed in captivity — it is evident that (once again) the Service is releasing fewer wolves than experts and the agency's own staff advise.

As noted above, the field team also proposed the release of two family packs from captivity which, in contrast to experimental cross-fostering, is the tried-and-true method for successful releases. Scientists and conservationists have long called for far more releases of family groups (and for caution in relying solely on cross-fostering). Releasing five packs into the wild this summer would be an appropriate first-step in mitigating some of the genetic damage to the population that the Service inflicted from many years of trapping and shooting genetically-valuable wolves and from the slow and episodic pace of wolf releases to date.

In addition to releasing the two packs that the field team proposed, and three additional packs that we believe are imperative, we request the expeditious release of a captured, yearling wolf, f1530, into the Cibola National Forest in New Mexico. This wolf, named "Sonora" in a contest in which children proffered names for her, migrated naturally from her release site in Mexico to the United States, just as wolves have done since time immemorial.

As shown in the Service's records, wolf releases have dwindled to rare events.[3] The result of the years in which the Service refused to release wolves, along with frequent agency live-removals of genetically important wolves, agency wolf shootings, and possibly also agency-abetted illegal killings of wolves through providing radio-telemetry receivers to avowed enemies of the wolves, is ongoing inbreeding depression — which may turn out to be the most consequential factor threatening the Mexican wolf with extinction.[4] In 2010, the Service identified inbreeding as one cause "hindering the growth and fitness of the Blue Range population," with the potential (along with other threats) of "putting the population in danger."[5] Nevertheless, from that point through now, seven-years later, the Service released a total of just fourteen new (i.e. captive-born) wolves to diversify the population; and only six of those (four pups released this year and two last year) are thought to be alive today in the wild. The high mortality and removal rate must be factored into the Service's determination of the number of captive-born wolf releases that are necessary to successfully infuse the wild population with new DNA, which is why the Service should release more wolves than originally proposed.

III. Release Family Packs In (and Near) the Gila and Apache Kid Wildernesses

We support the Interagency Field Team's proposal to release wolf packs in the Gila National Forest; albeit we believe that the team should release five, rather than two, such packs. Releases of bonded wolf pairs with pups and yearlings were successful in the first few years of the reintroduction program, and should be resumed. Our request for releases at Lilley Park, Miller Springs, Half Moon Park and Meason Flats reflects the fact that the Forest Service has already approved each of these areas for wolf releases; that they scored highly in the field team's

[3] https://www.fws.gov/southwest/es/mexicanwolf/pdf/MW_initial_releases_translocations_web.pdf.
[4] Fredrickson, R.J., P. Siminski, M. Wolf, and P.W. Hedrick. 2007. Genetic rescue and inbreeding depression in Mexican wolves. Proc. R. Soc. B: 274, 2365–2371.
[5] U.S. Fish and Wildlife Service. 2010. Mexican Wolf Conservation Assessment, p. 11, http://www.fws.gov/southwest/es/mexicanwolf/pdf/Mexican_Wolf_Conservation_Assessment.pdf.

standardized assessment of wolf-release sites;[6] that they currently support elk and deer but apparently no wolves; and that they are within the Gila Wilderness (the first three) or adjoining it (Meason Flats, between the Gila and Aldo Leopold Wildernesses). Similarly, San Mateo Canyon in its namesake mountain range in the Cibola National Forest (northeast of the Gila National Forest), and within the Apache Kid Wilderness, supports ample elk and deer. The San Mateo Mountains offer habitat with at least as many native prey animals and greater security for the wolves than the areas on the Mogollon Plateau in Arizona (northwest of the existing population), where the Service also has authority to release wolves.

Releasing family groups of wolves in the Gila and Apache Kid Wildernesses will increase the distribution of Mexican wolves significantly while increasing distribution entirely within the dispersal range of the existing population, and thereby, increasing the population's overall resilience. In assessing the Mexican wolf population and its vulnerabilities, the Service has acknowledged that a "species with a small population, narrowly distributed, is less likely to persist (in other words it has a higher risk of extinction) than a species that is widely and abundantly distributed."[7]

An example of how a small population and narrow distribution may increase the risk of Mexican wolf extinction can be discerned in the more frequent, high-intensity wildfires in the Southwest in recent years — a consequence of human-caused global warming. At least one of these recent wildfires (the Wallow Fire) overran a wolf den, and another (the Whitewater-Baldy Fire) came close to overrunning two other dens. The fires typically burn in the spring shortly after wolves give birth and before pups are mobile. With fires now sometimes burning through hundreds of thousands of acres, it is easy to envision the possible loss of multiple litters in a single spring due to wildfire activity.

Similar risks of loss from disease and parasites exist. In order to increase wolf distribution more quickly and lower extinction risk as fast as possible, family groups of wolves should be released in areas that do not support resident wolves -- ideally, within (and adjoining) the Gila and Apache Kid Wildernesses.

IV. Release 'Sonora,' an Intrepid Border-Crossing Wolf, in the U.S. Southwest

At the Service's direction, female wolf 1530 (named "Sonora" by school children), who was released last fall in Mexico, was captured on March 26, 2017 in southeastern Arizona near the Chiricahua Mountains. Sonora's removal and ongoing captivity precludes "adequate gene flow between populations to alleviate genetic threats," which the draft Mexican Wolf Recovery Plan describes as a condition for achieving "*representation* of the captive population's gene diversity in both [United States and Mexico] populations." The draft recovery plan aspires for releases of wolves from captivity, including through translocations of previously-caught wolves, to "serve as an effective tool during the recovery process to achieve appropriate

[6] Half Moon Park and Lilley Park were respectively the number 1 and 2 ranked sites from among 32 evaluated, while Miller Springs and Meason Flat ranked, respectively, 8 and 11. Mexican Wolf Blue Range Reintroduction Project, Evaluation of Initial Release and Translocation Site Availability and Suitability, Oct. 4, 2009.
[7] FEIS on revised Mexican wolf 10j rule (2014), chapter 1, p. 19.

representation."[8] Continuing to hold this wolf in captivity stymies the conditions on which the Service intends to rely to ensure recovery.

Disappointingly, the Service has acquiesced to the dictates of state game agencies in developing a draft Mexican Wolf Recovery Plan that would limit wolf distribution to areas south of Interstate 40. Limiting wolf movements disregards the views of independent wolf biologists that areas north of I-40 are necessary to recover the Mexican wolf.[9] To justify this risky departure from expert consensus, the draft recovery plan assumes robust future growth in the wolf population that was reintroduced in Mexico beginning in 2011, and assumes that translocations will replace functional connectivity between wolves in Mexico and in the U.S. Southwest: "The strategy is to release wolves from captivity to the wild and translocate wolves between populations to ensure wild populations benefit from the gene diversity available in the captive population addresses the conservation principle of (genetic) *representation*."[10]

We believe that wolves in Mexico should be connected to those in the U.S. through the natural movements of dispersing wolves to ensure genetic viability for a metapopulation, and that such functional connectivity should serve as one of the criteria for delisting. That would entail protecting wolves in such places as the "sky islands" region between the Sierra Madre and the Mogollon Plateau, even in the event of conflicts with livestock. However, the Service ordered Sonora's capture after she killed a single cow and in the vicinity of multiple, dead, non-wolf-killed cattle that may have drawn her to scavenge and may have precipitated the depredation. Future such lapses in animal husbandry and in disposal of ensuing carcasses, coupled with a propensity to make wolves the scapegoats in any conflict, threaten to permanently sever wolf connectivity between the U.S. and Mexico.

Should the Service fail to release Sonora into the wild U.S. population, the agency would be undermining the already dubious prospect that recovery can be achieved through translocations instead of connectivity between wolves in the U.S. south of Interstate 40, and wolves in Mexico. A better, long-term approach would be to manage Mexican wolves to ensure connectivity and establish through reintroduction and natural migration new populations of Mexican wolves in the Grand Canyon and southern Rocky Mountain ecosystems, north of I-40. Wolf populations in those regions would potentially grow larger than the population in Mexico can, and would thereby produce more dispersers with a greater likelihood of getting through the Service-enabled gauntlet and successfully breeding with wolves in the (conceivably future) central, Mogollon Plateau population.[11]

The reasons to free Sonora in the U.S. Southwest go beyond a prescription derived from a generalized model of recovery. Sonora's immediate ancestry differs from that of the Bluestem Pack in Arizona, whose descendants comprise almost the entire wild U.S. population of Mexican wolves. Consequently, Sonora could make a significant contribution to the ultimate survival and recovery of her subspecies if she is allowed to breed, raise pups and help diversify the inbred gene pool of the wild wolf population in the Southwest.

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[8] U.S. Fish and Wildlife Service. 2017. Draft Mexican Wolf Recovery Plan, First Revision, p. 24. Italics in original.
[9] Carroll, C., R.J. Fredrickson and R.C. Lacy. 2014. Developing metapopulation connectivity criteria from genetic and habitat data to recover the endangered Mexican wolf. Conservation Biology. 28:1, 76–86.
[10] Draft recovery plan, p. 24. Italics in original; awkward phraseology in original.
[11] Carroll et al, 2014.

The first step is to set Sonora free in a locale in which she might find a mate. We suggest her release near male wolf 1569, apparently single, who dispersed to the Cibola National Forest and has been traversing the San Mateo, Magdalena, Gallinas and Bear mountain ranges. As noted above in the context of releasing a family pack in the San Mateo Mountains, releasing Sonora in proximity to this wolf who is presently a geographic outlier to the population, could serve to broaden the distribution of the southwestern wolf population and thereby reduce one of the threats of extirpation that it faces.

Regardless of where you release Sonora (f1530) in the U.S., you should do so soon enough for her to meet and pair-bond with a lone, male wolf well before winter's wolf-breeding season and early enough to get her paws back on the ground and her nose situated to her surroundings before the dangers of the autumn deer and elk hunting seasons are upon her. The sooner the Service releases this border-crossing female back into the wild, the more chance she will have of surviving, reproducing and disproportionately contributing to the persistence and eventual recovery of her kind.

V. Prepare Now for Additional Releases of Bonded Pairs in 2018

Finally, we request that the Service immediately pair up as many compatible Mexican wolf pairs selected from the captive breeding facilities as the Sevilleta National Wildlife Refuge pre-release pens, and the Wolf Haven International (in Washington State) pre-release pens, can accommodate, and transfer them to those locations in preparation for releases next year. Doing so this summer would free the Service from logistical limitations in 2018 and in particular ensure that there are sufficient family groups to utilize this most effective means of enhancing the population and its genetic makeup.

Thank you for your consideration.

Sincerely endorsed by,

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