

**SUBMIT COMMENTS TO ENSURE THE GOVERNMENT'S PROPOSED RULE CHANGES
LEAD TO RECOVERY, NOT EXTINCTION, FOR MEXICAN GRAY WOLVES**

At last count, there were only 83 wild Mexican gray wolves, or lobos, in the U.S. and they need your help. The U.S. Fish and Wildlife Service (USFWS) recently proposed changes to the rule governing the reintroduction program for the critically endangered Mexican wolf.

While provisions to increase the area where new wolves can be released and to expand the area where they can roam are important, other proposed changes contradict what scientists say is necessary for the wolves' recovery.

COMMENTS on the draft proposal are due September 23. *Be sure to include these points in addition to your personalized message:*



1. I support a Recovery Alternative. In the draft Environmental Impact Statement, Alternative 3 should be modified so that it still expands the area where Mexican wolves can be released from captive-breeding facilities and allows them more room to roam, but does not expand loopholes for killing and trapping wolves, including those who enter the U.S. from Mexico.

Why: For 15 years, experts have recommended expansion of the release and roaming areas. Currently, new releases are hindered because they can only happen in a small part of Arizona. Mexican wolves are captured if they establish home ranges wholly outside arbitrary boundaries, even if they are not bothering anyone. Expanded range should not be linked to expanded opportunities to kill wolves.

2. USFWS should eliminate politically based boundaries to the Mexican wolves' movement. The draft proposal would keep wolves out of suitable habitats necessary for recovery.

Why: Preventing Mexican wolves from moving into northern New Mexico, southern Colorado, and the Grand Canyon region in northern Arizona and southern Utah contradicts the best available science. Additional of Mexican wolf populations and the ability for individuals to move between populations are necessary for the lobo's recovery and genetic health.

Not allowing Mexican wolves to establish home territories outside of the Mexican Wolf Experimental Population Area will result in more captures that risk death or trauma to the wolves. We cannot afford to lose rare Mexican wolves just because they cross an arbitrary boundary. There should be no restrictions on the wolves' movements.

3. The USFWS should designate reintroduced wild Mexican wolves as essential.

Why: The current designation of reintroduced Mexican wolves as "experimental-non-essential" ignores the importance of the U.S. wild population to the survival of the subspecies as a whole.

USFWS's claim that even if all the reintroduced wild Mexican wolves die, it would not be "likely to appreciably reduce the likelihood" of recovery in the wild contradicts science and common sense.

The 83 confirmed Mexican wolves in the wild have up to five generations of experience establishing packs and raising pups, and represent 22% of the entire population in the world.

The captive population alone is not an ark against extinction. Scientists, and even USFWS, have warned for years that prolonged captivity may leave successive generations of lobos less fit for life in the wild.

4. The proposed expanded provisions for “take” (killing, trapping, and removals) of these critically endangered Mexican wolves are unacceptable and will not contribute to the species’ recovery.

Why: Science-based program reviews show, and USFWS acknowledges, that the killing and permanent removal of Mexican wolves by government agents to resolve “conflicts” has contributed significantly to USFWS’s failure to meet even its modest reintroduction objective, let alone recovery.

USFWS’s proposed rule changes would allow for and attempt to rationalize removing even more Mexican wolves from the wild, even though the best peer-reviewed science concludes the species cannot recover unless human-caused mortality decreases. USFWS needs to tighten restrictions for “take” of Mexican wolves, not loosen them. Alternative 3 at least does not increase the current level of take.

The proposed rule would grant New Mexico and Arizona game and fish agencies authority to request trapping or shooting of Mexican wolves for alleged “unacceptable impacts” on herds of elk, deer and other natural wolf prey animals. Killing native Mexican wolves for providing the ecological service of culling weak, elderly, and infirm natural prey is illogical and undermines recovery.

Additional points you may want to include are:

USFWS should maintain protections for Mexican wolves that enter the U.S. from Mexico.

Why: Since 2011, Mexican authorities have begun reintroducing Mexican wolves south of the border. This year, the first litter of wild pups was born in Mexico since the 1970s. Today, if wolves cross the international border from Mexico they are fully protected as endangered under the Endangered Species Act, and shooting or trapping them is not permitted. The USFWS proposed rule changes, as well as Alternative 3, would remove these protections by designating them as “experimental non-essential.”

To promote gene flow between Mexican wolves in Mexico and the U.S., wolves from Mexico and their progeny with wolves from the U.S. reintroduced population should remain fully protected under the Endangered Species Act in the U.S.

USFWS should require livestock owners to remove from the landscape or render inedible (e.g. by lime) livestock carcasses that can attract Mexican wolves to scavenge where other domestic animals may be vulnerable, and habituate wolves to livestock.

Why: Scientists have repeatedly recommended that livestock owners take some responsibility to deal with carcasses before Mexican wolves scavenge them, rather than scapegoat the wolves after problems occur.

Mexican wolves that scavenge carcasses livestock owners fail to address should be held blameless for future depredations.

Please submit your comments electronically here:

<http://www.regulations.gov/#!documentDetail;D=FWS-R2-ES-2013-0056-6056>

Or by U.S. mail or hand delivery to:

Public Comments

Processing, Attn: FWS–R2–ES–2013–
0056; Division of Policy and Directives

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For more information, go to www.mexicanwolves.org