



November 23, 2010

The Honorable Ken Salazar
Secretary of the Interior
1849 C St. N.W.,
Washington, D.C.

By E-Mail: c/o Ms. Roslyn Sellars, FWS, Dr. Benjamin Tuggle, FWS, and
Ms. Lara Levison and Ms. Ayesha Giles, Office of the Secretary

RE: Recovery planning and related actions for the Mexican wolf

Dear Mr. Secretary:

On behalf of the North America Section of the Society for Conservation Biology (SCB-NA), we offer the following comments on actions by the US Fish and Wildlife Service (FWS) related to recovery of the Mexican gray wolf (*Canis lupus baileyi*)(henceforth 'Mexican wolf') under the Endangered Species Act. We are submitting comments and offering our assistance at this time because forthcoming FWS decisions concerning the recovery planning and implementation process may benefit from the scientific perspective provided by our organization.

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. The Society's membership comprises a wide range of people interested in the conservation and study of biological diversity: resource managers, educators, government and private conservation workers, and students make up the more than 8,000 members world-wide. We believe that SCB-NA's expertise can provide insights that may help strengthen the scientific basis and efficacy of recovery efforts.

HISTORY OF INVOLVEMENT IN THE ISSUE BY SCB AND OTHER SCIENTIFIC SOCIETIES

SCB-NA has been in communication with FWS concerning Mexican wolf recovery policy for several years. In December 2007, SCB-NA submitted scoping comments on the Environmental Impact Statement 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 (72 Fed. Reg. 151: 44065)(SCBNA 2007). SCB-NA comments focused in particular on the need for a revised recovery plan. In March 2008, SCB-NA sponsored an interdisciplinary workshop on applying conservation science to wolf recovery goals under the Endangered Species



Act, which resulted in a publication reviewing this issue and its relevance to broader issues regarding interpretation of the Endangered Species Act (Carroll et al. 2010). In March 2009, SCB-NA submitted a letter to the FWS offering assistance in evaluating how current scientific research might better inform the process of setting recovery goals for the gray wolf in the western United States.

Similar comments have been submitted concerning the Mexican wolf recovery program by other scientific societies. For example, in August 2009, the American Society of Mammalogists urged the FWS to expedite development of a new Mexican Wolf recovery plan, to identify new recovery areas in addition to the Blue Range Wolf Recovery Area (BRWRA), and to suspend lethal control directed at Mexican wolves until a population goal of 100 wolves had been met (ASM 2009). While the FWS had previously predicted that this goal would be met by 2006, the population of Mexican wolves in the wild has stagnated at approximately half of that goal since 2003, when management of the BRWRA wolf population was turned over to a six-agency decision-making body, the Mexican Wolf Adaptive Management Oversight Committee (AMOC). AMOC instituted Standard Operating Procedure 13 (SOP 13), a measure that required the removal or killing of wolves involved in three fatal livestock depredations in one year.

CURRENT OPPORTUNITIES FOR SCIENCE TO INFORM RECOVERY POLICY

While past Mexican wolf recovery efforts have not met anticipated goals, several recent developments offer promise that science and sound policy can better inform the Mexican wolf recovery program and help FWS create an Endangered Species Act success story.

- 1) In 2009, settlement of litigation initiated by several conservation organizations ended SOP 13 and removed the AMOC's decision authority, returning decision authority for Mexican gray wolf recovery to the FWS;
- 2) FWS last year published a draft Conservation Assessment that recognized many of the programmatic problems hindering achievement of recovery goals (FWS 2010a);
- 3) FWS has recently issued an RFP to prepare an independent assessment of the Mexican gray wolf recovery and reintroduction program (FWS 2010b); and
- 4) FWS has recently contacted several scientists to solicit their participation on a team to develop a new recovery plan.

REQUESTED ACTIONS

Given these developments, SCB-NA would like to reiterate its willingness to assist, both as an organization and through our individual members, in making the recovery planning and implementation process scientifically valid, legally sound, and successful.

Based on our assessment of the measures necessary to ensure that, we ask the FWS to implement the following actions:



- 1) **Implement recommendations of the three-year review report** (Paquet et al. 2001). The report was commissioned by the FWS from the International Union for the Conservation of Nature, and completed in June 2001. It recommended 1) revising the 1982 recovery plan, 2) allowing wolves that are not management problems to establish territories outside the BRWRA, 3) allowing captive wolf releases into the Gila National Forest (New Mexico), and 4) requiring livestock operators on public land to improve carcass management. The report's recommendations, although almost a decade old, remain highly relevant to developing an effective recovery strategy for the subspecies, and illustrate how much time has passed without necessary corrective steps being taken.
- 2) **Expedite development of a new recovery plan.** We concur with Paquet et al. (2001)'s recommendation that it is imperative that a scientifically credible recovery planning process be reinitiated immediately.
- 3) **Complete the process to amend the Reintroduction Project Rule.** This process was begun in 2007. At least 12,000 people participated in a 2007 National Environmental Policy Act (NEPA) scoping process for proposed rule changes, but FWS has not moved forward with the process. FWS has stated that the delay related to lack of funding for a related socio-economic study, but an existing socio-economic study meets legal requirements. To ensure compatibility of both science and policy, the rule revision process should be fully coordinated with the development of a new recovery plan.
- 4) **Release the draft Environmental Assessment (EA) to expedite direct releases of wolves into New Mexico.** Genetic problems have become evident in the Mexican wolf population, related to both inbreeding and prolonged captivity (Fredrickson et al. 2007, Frankham 2008, Hedrick and Fredrickson 2010). This suggests that the FWS needs to release genetically selected animals from the captive breeding facilities into available habitat in New Mexico. An EA that would expedite such releases has been drafted. The FWS should immediately release the draft EA for public review, comments, and final action.
- 5) **Engage the Forest Service, and other relevant agencies, in recovery activities,** as required by Section 7(a)(1) of the Endangered Species Act, which requires all Federal agencies to “utilize their authorities in furtherance of the purposes of this Act by carrying out programs for the conservation of endangered species...”, “in consultation with and with the assistance of, the Secretary” (of the Interior).
- 6) **Initiate a science-based review of wolf recovery strategy and recovery goals in the western U.S.** and apply relevant information from this effort to inform Mexican wolf recovery planning and implementation. For example, a



recent comparison of the genetic consequences of wolf recovery strategies in the Northern Rocky Mountains, southwestern U.S., and Europe (Wayne and Hedrick in press) provides insights relevant to enhancing prospects for successful recovery of the Mexican wolf. Similarly, recent genetic research has allowed evaluation of the level of genetically-effective dispersal between subpopulations in the Northern Rocky Mountains wolf meta-population (vonHoldt et al. 2010). Such techniques should allow development of quantitative recovery goals and rigorous monitoring protocols in the Mexican wolf recovery program, as required by Section 4(1)(B) and (4)(3) of the Act respectively.

SCB-NA offers to facilitate and/or assist in each step of this process.

Sincerely,

Dominick A. DellaSala, Ph.D.
President
Society for Conservation Biology, North America Section

John M. Fitzgerald, J.D.,
Policy Director
Society for Conservation Biology

References

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