

# Mexican Wolf EIS



## Public Comment Process and Analysis for Scoping Phase

Final Report to the  
U.S. Fish and Wildlife Service

May 22, 2008



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# Executive Summary

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The U.S. Fish and Wildlife Service (FWS) contracted with D. J. Case and Associates (DJ Case) in June of 2007 to assist in planning and implementing public input for a scoping process to identify issues to consider in developing alternatives preparatory to development of a new Environmental Impact Statement for the Mexican gray wolf reintroduction program. DJ Case is a natural resources communications firm based in Mishawaka, Indiana.

DJ Case researched successful public input processes for high-profile species for application to the Mexican gray wolf scoping process. Based on the research and follow-up interviews, DJ Case recommended an open house format for the scoping meetings. In addition, a “virtual meeting” Web site was recommended. The recommendations were presented to the Adaptive Management Oversight Committee (AMOC) in August 2007 and adopted by the FWS.

A notice of the public input process was published in the Federal Register (August 7, 2007, Vol. 72, No. 151). Twelve public scoping meetings were held between November 26, and December 8, 2007. These consisted of a narrated PowerPoint presentation and informational displays. Representatives from the AMOC, including the FWS's Mexican wolf recovery coordinator, were available to answer participants' questions and listen to their ideas and concerns. The meetings were attended by 1,286 people.

A Web site, [www.mexicanwolfeis.org](http://www.mexicanwolfeis.org), was developed to serve as a “virtual meeting,” where visitors could go to see the same information presented at the public meetings, including the PowerPoint presentation and informational displays. Links to the FWS e-mail for public comments were included on the site.

Written comments were solicited for the public record during the comment period, August 7 through December 31, 2007. A total of 13,598 comments were received. Of those, 12,698 were received electronically, 583 were faxed or mailed, and 317 were submitted at the public meetings.

The thousands of comments received required some form of systematic analysis to facilitate compilation, interpretation, and understanding, and because of the different forms of submission (electronic and hard copy), different methods were employed to conduct the analysis. Basically, thematic analysis and key-word analysis were used to categorize the wolf comments. Comments submitted at the public meetings and through mail and faxes were reviewed by DJ Case for common themes. Additionally, Atlas.ti, an analysis software program, was used to search all e-mailed submissions for (a) thematic similarities and (b) selected keywords of special interest to the FWS.

Written comments were solicited for the public record during the comment period, August 7 through December 31, 2007. A total of 13,598 comments were received. Of those, 12,698 were received electronically, 583 were faxed or mailed, and 317 were submitted at the public meetings.

The range of comments was wide, with many comments for and against the reintroduction program. Many comments were general in nature, expressing support for, or disapproval of, the wolf reintroduction program. All ideas and opinions were viewed with equal importance, whether stated by a few people or a few thousand.

Twenty-six different issues emerged from the comments for consideration by the FWS during development of alternatives.

- Enforcement of the Endangered Species Act
- Legality of the reintroduction program
- Public education
- Definition of the term “depredation”
- The time and expense involved in proving wolf depredation
- Reclassification from “non-essential, experimental” to another designation
- Economic impacts resulting from boundary extension
- Social impacts resulting from the wolf reintroduction program
- Role of wolves in the ecosystem
- Diseases spread by wolves
- Genetic diversity
- Translocations
- Target population number
- Take
- Definitions of terms
- Release and recovery area boundaries
- Wolves’ impact on hunting and prey populations
- Habituation of wolves toward humans
- Livestock on public lands
- Removal of livestock carcasses from public lands, or otherwise rendering them inedible
- Protection of domestic animals
- Compensation for confirmed wolf kills
- The age of the Recovery Plan
- Funding and staffing levels for the Mexican wolf project
- Wolf tracking
- Agency Roles

# I. Introduction

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Contemporary programs of wolf restoration and management face a daunting range of public sentiment.

The word “wolf” evokes extremes of human emotion and opinion across North America. From timeless fairy tales that have entertained and tutored generations of children in Western society, to music (Prokofiev’s “Peter and the Wolf,” for example), to frontier history, to contemporary field research on wolf life history, the wolf caricature ranges from an untamed, cunning, vicious, and dangerous adversary of civilization’s advance, to a curious, social, faithful, and authentic member of the wild kingdom. Ironically, the wild canid’s eventual domestication would result in the truly unprecedented moniker, “Man’s Best Friend.”

Perhaps modern culture’s ambivalence toward wolves is most simply illustrated in the names we give ourselves. Sports teams, high school bands, military units, even achievement awards in the Scouting program, to name a few, use the words “wolf,” “wolves,” and “wolf pack” to connote accomplishment, fidelity, prowess, strength, and celebration of the wild. Yet these character attributes of distinction are countered with utterance of a simple phrase proclaiming just the opposite — “Big Bad Wolf.”

There is no question that people are passionate about wolves, and about their families, homes and livelihoods. That passion is reflected by the many people in Arizona, New Mexico, and throughout the country who took time to attend public meetings and who went to the effort of providing written comments during the scoping process. Their thoughtful insights and ideas are an important part of the public input process, and represent one of the greatest benefits of living in a free society: the right to share an opinion and form public policy as a result.

Mexican wolves are the smallest and rarest subspecies of gray wolves in the Americas. They lived mostly in mountainous woodlands of the desert Southwest before European settlement, preying upon large and small mammals. Like all wolves, they depend on a healthy population of large ungulates (elk and deer) to survive.

The Mexican gray wolf subspecies was listed as endangered in 1976 under the Endangered Species Act of 1973. In 1978, the FWS listed the gray wolf species as endangered, with the exception of Minnesota (where it was listed as threatened). Scientists recognized the Mexican gray wolf as a valid subspecies for purposes of research and conservation (Federal Register, August 7, 2007, Vol. 72, No. 151). Because it was a subspecies, the FWS continued to refer to this southernmost wolf as the “Mexican gray wolf,” and in 1998, a Final 10(j) Rule was created to establish a nonessential experimental population of this subspecies in New Mexico and Arizona. Eleven captive-born and reared animals were released into the Blue Range Wolf Recovery Area on January 12, 1998.

... the wolf caricature ranges from an untamed, cunning, vicious, and dangerous adversary of civilization’s advance, to a curious, social, faithful, and authentic member of the wild kingdom.

As part of the Environmental Impact Statement process, the FWS conducted reviews of the reintroduction program in 2001 and 2005 (Paquet, et al., 2001 and AMOC, 2005). These reviews identified a number of issues limiting the success of the program, which called for 100 wolves and 18 breeding pairs in the wild by the end of 2006. By the end of 2007, 52 wolves and four breeding pairs were documented in the wild.

Six issues, in particular, were outlined for scoping. These were published in the Federal Register (August 7, 2007, Vol. 72, No. 151):

- The current management stipulations that require wolves that establish home ranges outside the Blue Range Wolf Recovery Area (BRWRA) to be removed and re-released into the BRWRA or taken into captivity.
- Current management stipulations allow for initial Mexican gray wolf releases from captivity only into the primary recovery zone of the BRWRA.
- The definition of the White Sands Missile range, which is listed as a recovery area but is too small and does not have adequate prey base.
- Limited provisions for private individuals to “harass” wolves engaged in nuisance behavior or livestock depredation, or which are attacking domestic pets on private, public or Tribal lands.
- Current provisions of the 1998 10(j) Final Rule that do not allow for “take” of wolves in the act of attacking domestic dogs on private or Tribal lands.
- Clarification of definitions such as “breeding pair,” “depredation incident” and “thresholds for permanent removal.”

Based on the 2005 review, the decision was made to continue the reintroduction program with modifications. A scoping process was initiated to identify potential changes in preparation for a new Environmental Impact Statement (EIS). D.J. Case & Associates (DJ Case), a conservation communications firm, was contracted by the FWS to coordinate and facilitate public input for the initial scoping process.

DJ Case researched public involvement processes used in recent years for high-profile species to identify successful approaches. Based on that research, DJ Case developed recommendations that included an open house public meeting format, development of a public Web site, and mail-in comment cards (Wallace, et al., 2007). The open house format was suggested for the scoping process for several reasons:

- Open houses facilitate and encourage two-way communication.
- Participants have the opportunity to gain a better understanding of the issues through dialogue with representatives of agencies involved in the wolf reintroduction process.
- Every attendee has the opportunity to ask questions and provide written comments.
- Participants can attend anytime during the open house period at their convenience.

- Participants uncomfortable speaking in a large group or holding viewpoints they perceive to be different than the majority are more likely to engage in one-on-one discussion than speak in front of a large group in a public hearing-type setting.

These recommendations were presented at the August 2007 meeting of the AMOC. Based in part on a recommendation from the AMOC, the FWS elected to adopt the open house meeting format and Web site approach, and contracted with DJ Case to implement the processes.

## II. Methods

**MEETING FACILITIES** DJ Case arranged facilities for 12 public meetings held in Arizona and New Mexico between November 26 and December 8, 2007. FWS, local representatives from the New Mexico Department of Game and Fish, and Arizona Game and Fish Department assisted in identifying potential meeting facilities in each area. An effort was made to secure government or civic meeting facilities, and if those were not available or feasible, local colleges/universities and hotel establishments. Criteria for the selected facilities included Americans with Disabilities Act (ADA) accessibility, as well as accommodations for up to 100 participants in smaller towns, and up to 500 people in larger locations.

Table 1: Dates, times, and meeting locations for the Mexican Wolf EIS scoping meetings

DATES	TIMES	CITY/STATE	MEETING LOCATION
November 26, 2007	5–9pm	Flagstaff, AZ	Radisson Woodlands Hotel 1175 W Route 66, Flagstaff, AZ 86001
November 27, 2007	5–9 pm	Hon-dah, AZ	McNary School 108 N. Pollack, McNary, AZ 85930
November 28, 2007	5–9 pm	Alpine, AZ	Alpine Community Center #12 CR 2052, Alpine, AZ 85920
November 29, 2007	5–9 pm	Grants, NM	Best Western 1501 East Santa Fe Avenue., Grants, NM 87020
November 30, 2007	5–9 pm	Albuquerque, NM	Indian Pueblo Cultural Center 2401 12th Street NW, Albuquerque, NM 87104
December 1, 2007	11 am–3 pm	Socorro, NM	New Mexico Institute of Mining and Technology 801 Leroy Place, Socorro, NM 87801
December 3, 2007	5–9 pm	Alamogordo, NM	New Mexico State University 2400 N Scenic Drive, Alamogordo, NM 88310
December 4, 2007	5–9 pm	Las Cruces, NM	Farm and Ranch Heritage Museum 4100 Dripping Springs Road, Las Cruces, NM 88011
December 5, 2007	5–9 pm	Glenwood, NM	Glenwood Community Center Mengas Lane, Glenwood, NM 88039
December 6, 2007	5–9 pm	Safford, AZ	Eastern Arizona College 1014 N College Avenue, Thatcher, AZ 85552
December 7, 2007	5–9 pm	Tucson, AZ	University of Arizona 1303 E University Boulevard, Tucson, AZ 85721
December 8, 2007	11 am–3 pm	Phoenix, AZ	Glendale Civic Center 5750 West Glenn Drive, Glendale, AZ 85301



**PUBLICITY** The FWS prepared an official notice of 12 public scoping meetings, which was published in the August 7, 2007 Federal Register (Vol. 72, No. 151). Legal ads were placed in at least one local newspaper for each of the 12 public meetings (Table 2). In addition, the Service distributed a news release to 262 media outlets in the areas surrounding the meeting sites. The news release can be found in Appendix A.

Table 2: Legal ad placement

MEETING LOCATION	NEWSPAPER	CITY	STATE	INSERTION DATE
Flagstaff, AZ	<i>Arizona Daily Sun</i>	Flagstaff	AZ	Friday, November 9
Hon-dah, AZ	<i>Eastern Arizona Courier</i>	Hon-dah	AZ	Sunday, November 18
Hon-dah, AZ	<i>White Mountain Independent</i>	Hon-dah	AZ	Friday, November 9
Alpine, AZ	<i>Eastern Arizona Courier</i>	Alpine	AZ	Sunday, November 18
Grants, NM	<i>Cibola County Beacon</i>	Grants	NM	Friday, November 9
Albuquerque, NM	<i>Albuquerque Journal</i>	Albuquerque	NM	Friday, November 9
Socorro, NM	<i>El Defensor Chieftan</i>	Socorro	NM	Saturday, November 10
Alamogordo, NM	<i>Alamogordo News</i>	Alamogordo	NM	Friday, November 16
Las Cruces, NM	<i>Las Cruces Sun News</i>	Las Cruces	NM	Sunday, November 18
Glenwood, NM	<i>Silver City Daily Press</i>	Glenwood	NM	Friday, November 16
Safford, AZ	<i>Eastern Arizona Courier</i>	Safford	AZ	Sunday, November 18
Tucson, AZ	<i>Arizona Daily Star</i>	Tucson	AZ	Friday, November 16
Tucson, AZ	<i>Tucson Citizen</i>	Tucson	AZ	Friday, November 16
Phoenix, AZ	<i>East Valley Tribune</i>	Mesa	AZ	Friday, November 16

**MEETING PROCESS** The open house meeting format included four elements:

- A six-minute, continuous-loop, narrated PowerPoint presentation providing an overview of the scoping process and several issues identified during the program reviews;
- A series of informational panels about Mexican gray wolves, the reintroduction process, and maps of the BRWRA and recovery area boundaries;

- The opportunity to talk one-on-one with representatives of the AMOC, who were available to answer questions and discuss issues and concerns;
- Comment cards participants could use to submit written comments for the public record.

In order to help ensure consistency across all the meetings, facilitators from DJ Case provided training to agency representatives prior to the meetings.

At each meeting, participants were greeted at the door by DJ Case facilitators. The facilitators explained the meeting format, invited participants to sign up for further communications from the FWS, and gave each participant a comment card, encouraging them to provide written comments during the comment period ending December 31, 2007 (see Appendix B for representative samples of the comments received). Facilitators encouraged participants to first view the six-minute narrated PowerPoint presentation.

The narrated PowerPoint presentation was set up in one corner of the room with seating. It was set to a continuous loop and ran throughout the meeting. The presentation highlighted issues identified during the reintroduction review process, and asked participants to provide additional issues the FWS should consider. A copy of the presentation is included in Appendix C.

Nine informational panels and two maps of the BRWRA and recovery area boundaries were displayed around the room at each meeting. These included biological and life history information about Mexican gray wolves, as well as information about the reintroduction and the public input process. Most participants viewed the exhibits and many commented on the amount of information they learned. Copies of the informational displays are located in Appendices D-N.

The open house format provided the opportunity for participants to speak one-on-one with representatives from the AMOC, including staff from the FWS, US Forest Service, Arizona Game and Fish Department, New Mexico Department of Game and Fish, White Mountain Apache Tribe, and USDA APHIS-Wildlife Services. Participants and agency representatives were able to engage in dialogue; participants could ask questions of the representatives, as well as express their ideas and concerns. This kind of interaction is invaluable in helping to identify the range of issues and concerns—the purpose of the scoping process. It must be noted, however, that the information gained through this process was not captured in writing or recorded.

In order to ensure participants' comments were stated in their own words, they were encouraged to submit written comments. Comment cards (Appendix O) were developed for this purpose. Participants were advised that the interaction with representatives would not be recorded, and written comments would become part of the



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public record. Comments were collected at the meetings, and participants were told they could also submit comments via mail, fax, or e-mail. Mailing address, fax number and e-mail address were posted at each meeting.

WEB SITE A Web site, [www.mexicanwolfeis.org](http://www.mexicanwolfeis.org), was developed as a “virtual public meeting.” It contained the same information presented at the meetings, so those not able to attend meetings would be able to gain information about the reintroduction and submit written comments. The overview PowerPoint presentation was posted to the site as a PDF file, as were PDF files of the informational panels. A link to the FWS wolf comment e-mail address was posted on the Web site on each of several pages as well, making it easy for viewers to submit written comments.

ANALYSIS The thousands of comments received required some form of systematic analysis to facilitate compilation, interpretation, and understanding, and because of the different forms of submission (electronic and hard copy), different methods were employed to conduct the analysis.

Basically, thematic analysis and key-word analysis were used to categorize the wolf comments. Comments submitted at the public meetings and through mail and faxes were reviewed by DJ Case for common themes. Additionally, Atlas.ti, an analysis software program, was used to search all e-mailed submissions for (a) thematic similarities and (b) selected keywords of special interest to the FWS.

It should be noted that while the software was used to search electronic documents, all e-mailed comments were reviewed by DJ Case staff to make sure all issues were identified.

Each hard copy comment was scanned to a PDF file to create an electronic record. These were provided to the FWS.

## III. Results

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A total of 1,286 people attended the public meetings (Appendix P).

A total of 13,598 comments were received during the comment period August 7 through December 31, 2007. Of those, 12,698 were received electronically, 583 were faxed or mailed, and 317 were submitted at the public meetings. An additional 101 comments were received but did not become part of the public record because they lacked complete contact information.

Table 3: Summary of number of comments

TYPE OF COMMENT	QUANTITY
E-mail	12,698
Signed/fully addressed	583
Scoping meeting	317
Incomplete contact information	101
<b>Total</b>	<b>13,699</b>

Two-hundred and nine of the hard copy comments were similar in content as they were either form letters or adapted from form letters. Approximately 80 percent of the e-mailed comments consisted of five different form letters, though many were personalized.

It must be emphasized that each individual's comments were considered. Moreover, the purpose of the comments was not to take a poll or a vote, but rather to identify the range of issues for the FWS to consider during development of alternatives for a new EIS. All ideas and opinions were viewed with equal importance, whether stated by a few people or a few thousand.

The range of comments was wide, with many comments for and against the re-introduction program. Many comments were general in nature, expressing support for, or disapproval of, the wolf reintroduction program. Appendix B contains comments that represent the range of input received. Twenty-six different issues emerged from the comments and these are listed below. These are numbered for discussion purposes; the numbers do not indicate priority. There tended to be two or more perspectives within each of the issues and these are also included below.

1. Enforcement of the Endangered Species Act
  - a. Inadequate law enforcement to catch poachers
  - b. Poachers are not being prosecuted
  - c. Incentives for cooperation with law enforcement
2. Legality of the reintroduction program
  - a. Terminate the program
  - b. Reintroduction process is unconstitutional
3. Public Education
  - a. The public needs information about the program, as well as education about why issues are handled the way they are
  - b. Wolf monitoring information should be shared with residents

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4. Definition of the term “depredation”
  - a. Depredation of livestock grazing illegally on public lands should not “count” as a depredation
  - b. A wolf that kills three head of cattle at a time should count for three depredation incidents, rather than one incident
5. The time and expense involved in proving wolf depredation
  - a. Proof is a burden on ranchers
  - b. Depredation is a cost-of-business issue for which ranchers should have insurance
6. Reclassification from “non-essential, experimental” to another designation
  - a. Change classification to “experimental, essential” or “endangered”
  - b. Keep the wolf population designated as it is, with no re-classification
7. Economic impacts resulting from boundary extension
  - a. The presence of wolves will make it harder on ranchers to do their jobs
  - b. The presence of more wolves could drive a new eco-tourism industry, bringing more jobs to the area
8. Social impacts resulting from the wolf reintroduction program
  - a. The potential of psychological harm to children from the fear of wolves
  - b. Value of being able to see a wolf or hear a wolf howl
  - c. Social customs such as Matanzas (slaughter events) could be negatively impacted by the reintroduction of more wolves
9. Role of wolves in the ecosystem
  - a. Top predators like wolves are needed to keep the ungulate population in check
  - b. Ecosystems are altered to the point that wolves are not needed as predators
10. Diseases spread by wolves
  - a. The spread of zoonotic diseases in wolf feces, and dissemination of rabies
11. Genetic diversity
  - a. The Mexican wolf population is inbred
  - b. Release sites should be expanded, including direct release into New Mexico, to preserve genetic diversity
12. Translocations
  - a. Relocations of known “problem wolves” should not be allowed
  - b. Stress of relocation causes some mortality
13. Target population number
  - a. Place no upper limit on the number of wolves in the population
  - b. Keep the cap on the number of wolves
14. Take
  - a. The “three-strike” rule should not apply to the wolves
  - b. One head of cattle should equal one strike
  - c. Wolves should only be killed if they threaten a human life

- d. Lethal control should be based upon the wolf's population structure and genetics
  - e. Take should be limited
  - f. Take should not be allowed
  - g. Investigate alternative forms of non-lethal take
15. Definitions
- a. "Harassment" should be better defined
  - b. Define breeding pair to specify a pair that has mated and produced pups
16. Release and recovery area boundaries
- a. Eliminate all restrictions on wolf movement
  - b. Do not expand the project beyond the current boundaries
  - c. The White Sands Missile Range is unsuitable as a release area
  - d. The White Sands Missile Range is suitable for wolf habitat
  - e. Expand release areas to the Grand Canyon and Sky Island areas
  - f. Allow initial releases in the secondary recovery zone
  - g. Do not allow initial releases into the secondary recovery zone
  - h. Wolves are being released where they were not historically present
17. Wolves impact hunting and prey populations
- a. Wolves have a negative impact on hunting success
  - b. Wolves don't have any affect on hunting success
  - c. Studies are needed to determine the impacts of wolves on prey populations and hunting success
  - d. Wolves make elk more wary, leading to a more satisfying hunting experience
  - e. Wolves have a positive impact on riparian natural communities by keeping elk populations from congregating near water and overgrazing vegetation.
18. Habituation of wolves toward humans impacts public safety
- a. Wolves have become "habituated" to humans through captivity and artificial feeding after release
  - b. Wolves stalk children
  - c. Children are psychologically harmed from fear of wolves
  - d. No documented cases of wolves killing humans in North America
  - e. Wolves carry disease
  - f. Need an education program to teach people what to do if they encounter wolves
  - g. Wolf sightings are a positive experience
19. Livestock on public lands
- a. Retire grazing permits permanently
  - b. Move cattle away from den sites
  - c. Eliminate open-range calving on public lands
  - d. Consider an incentive program that would pay an upfront fee to ranchers based on the number of wolves using the allotment
  - e. Pay for additional fencing or other structures to protect livestock
  - f. The wolf reintroduction program will put ranchers out of business

20. Removal of carcasses from public lands, or otherwise rendering them inedible
  - a. Require removal of carcasses from public land, or render them inedible
  - b. It is impractical to expect ranchers to remove carcasses
  - c. Compensate ranchers for removing carcasses from public land
  - d. Animal inspectors should remove carcasses
21. “Taking” of wolves that have attacked pets
  - a. Working ranch dogs are valuable ranch assets and not easily replaced
  - b. People should have the right to shoot a wolf attacking a pet
  - c. People should not have the right to shoot a wolf attacking a pet
  - d. Provide education about precautions to decrease wolf-dog interactions
  - e. Wolves near areas with pets should be hazed, but not killed
  - f. Pets killed on public land should not be the responsibility of the state
22. Compensation for confirmed wolf kills
  - a. Current compensation does not cover the loss
  - b. The government should pay compensation rather than a non-profit organization
  - c. Develop insurance to cover losses
  - d. Wolf kills are difficult to prove and some livestock owners are not reimbursed
  - e. Kills that cannot be confirmed as wolves should be reimbursed
  - f. Recalculate “depredation values” to account for more than just “market value”
  - g. Compensation program should be managed by ranching interests
23. Age of the Recovery Plan
24. Funding and staff for the Mexican Wolf project
  - a. The project is too expensive and should be stopped
  - b. The program is insufficiently funded
  - c. Use volunteers to augment the Inter-Agency Field Team
  - d. Provide funding and training to local jurisdictions
25. Wolf tracking
  - a. All pups should be fitted with collars
  - b. Need a better accounting of pup survival
  - c. Require FWS to track all wolf movements and notify residents
  - d. Only wolf program employees should have access to telemetry equipment
26. Agency Roles
  - a. Limit AMOC involvement
  - b. Forest Service policies interfere with program success
  - c. Wolf program impacts ability of APHIS-Wildlife Services to maintain responsibilities outside of wolf area

There is no question the reintroduction of Mexican wolves is divisive. There are strong feelings and opinions on both sides of the issue. Nonetheless, there is also hope, as expressed by many from both perspectives, who believe it possible to return wolves to the landscape while maintaining the ranching way of life.

Regardless of their perspective, many of those submitting comments expressed thanks to the FWS for the opportunity to be heard. It was obvious to many that this “thank you” was more than a gratuitous final gesture—but rather an appreciation that, regardless of where writers stood on the issues at hand—the process of providing input, expressing their hopes, concerns, bad experiences, good experiences, and recommendations for actions—is the purest, most direct, and most gratifying form of governance.



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The following documents were cited specifically or used for reference.

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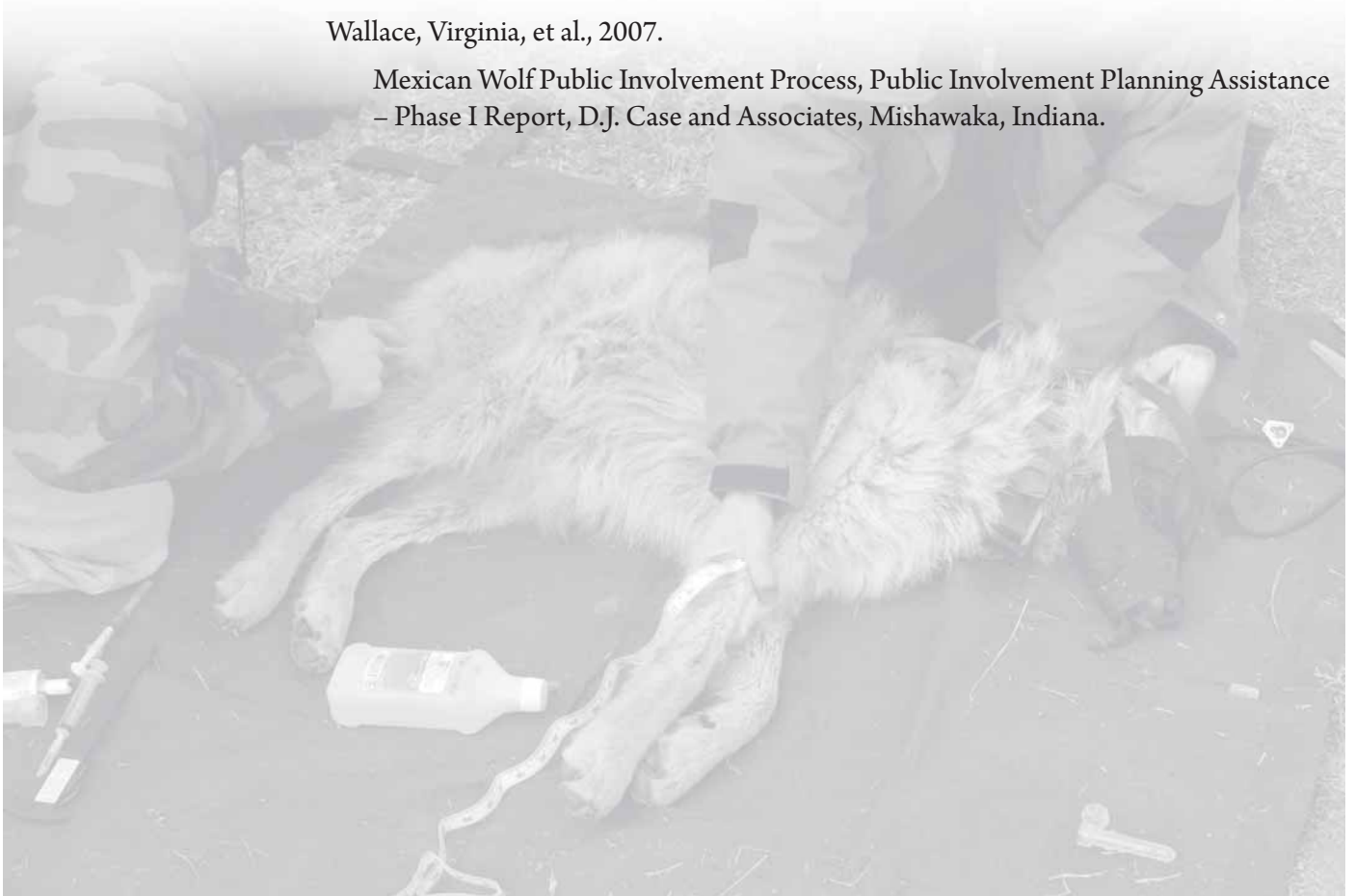
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## Appendix A: News Release

U.S. Fish and Wildlife Service



# News Release

Public Affairs Office  
 PO Box 1306  
 Albuquerque, NM 87103  
 505/248-6911  
 505/248-6915 (Fax)

Southwest Region (Arizona • New Mexico • Oklahoma • Texas) <http://www.fws.gov/southwest/>

For Release: October 31, 2007

Contact: Elizabeth Slown, 505-248-6909/363-9592, [elizabeth\\_slown@fws.gov](mailto:elizabeth_slown@fws.gov)

## Suggestions for Modifying Mexican Wolf Reintroduction Program Sought *Public Meetings Scheduled to Solicit Ideas*

The U.S. Fish and Wildlife Service has begun a scoping process to gather input on potential modifications to its rule that established a reintroduction program for the Mexican gray wolf. The Service established a nonessential, experimental population of the Mexican gray wolf in 1998, and has introduced more than 90 wolves into Arizona and New Mexico.

“We have been reintroducing wolves into the wild for nine years now and we’ve learned a thing or two,” said Brian Millsap of the U.S. Fish and Wildlife Service. “We want to hear from everyone else on what they have learned and what their recommendations are for recovering the Mexican wolf. We’ve set the meetings up to facilitate conversations. The website mirrors the meetings as much as possible so those who can’t be with us can join in on the website at [www.mexicanwolfeis.org](http://www.mexicanwolfeis.org).”

The scoping process will include 12 open-house style meetings. Participants may attend any time during the meeting at their convenience. The meetings will include:

- Informational materials about the Mexican gray wolf reintroduction program
- A continuous overview presentation for participants to watch at their convenience
- One-on-one opportunities to provide information to Adaptive Management Oversight Committee (AMOC) representatives and agencies’ staff, and ask them questions about the rule change and EIS process. Questions about the process will be answered, but issues will not be debated.
- Comment cards for participants to submit written comments during the meeting, or during the comment period which ends December 31, 2007

The Monday through Friday sessions will run from 5 to 9 p.m. and Saturday meetings will take place from 11 a.m. to 3 p.m. Participants are welcome any time during those time periods.

Meetings will be held in the following locations. Directions are located at [www.mexicanwolfeis.org](http://www.mexicanwolfeis.org).

- Monday, Nov. 26: Flagstaff, Ariz., Grand Ballroom, Radisson Woodlands Hotel-Flagstaff, 1175 W Route 66, Flagstaff, Ariz. 86001
- Tuesday, Nov. 27: Hon-Dah, Ariz., Multipurpose Room, McNary School, 108 N. Pollack Ave., McNary, Ariz. 85930

- Wednesday, Nov. 28: Alpine, Ariz., Alpine Community Center, Alpine Chamber of Commerce, #12 CR 2052, Alpine, Ariz. 85920
- Thursday, Nov. 29: Grants, N.M., Ballroom, Best Western, 1501 East Santa Fe Ave. Grants, N.M. 87020
- Friday, Nov. 30: Albuquerque, N.M., Special Events Building, Indian Pueblo Cultural Center, 2401 12th St. NW, Albuquerque, N.M. 87104
- Saturday, Dec. 1: Socorro, N.M., Macey Conference Center Lobby/Foyer, New Mexico Tech, 801 Leroy Pl, Socorro, N.M. 87801
- Monday, Dec. 3: Alamogordo, N.M., Tays Special Events Center, New Mexico State University, 2400 N Scenic Dr., Alamogordo, N.M. 88310
- Tuesday, Dec. 4: Las Cruces, N.M., Tortugas Ballroom, Farm and Ranch Heritage Museum, 4100 Dripping Springs Rd., Las Cruces, N.M. 88011
- Wednesday, Dec. 5: Glenwood, N.M., Glenwood Community Center, Mengas Ln., Glenwood, N.M. 88039
- Thursday, Dec. 6: Safford, Ariz., Open Dining Room at the Activities Center, Eastern Arizona College, 1014 N College Ave., Thatcher, Ariz. 85552
- Friday, Dec. 7: Tucson, Ariz. Student Union Memorial Center (Tucson and Catalina Rooms), University of Arizona, 1303 E. University Blvd, Tucson, Ariz. 85721
- Saturday, Dec. 8: Phoenix, Ariz., Garnet, Emerald, and Sapphire Rms., Glendale Civic Center, 5750 West Glenn Dr., Glendale, Ariz. 85301

Those requiring assistance under the Americans with Disabilities Act must contact Charna Lefton, 505-248-6911 or by electronic mail to [Charna\\_Lefton@fws.gov](mailto:Charna_Lefton@fws.gov) at least three days prior to the meeting they plan to attend. Persons who use a telecommunications service for the deaf (TDD) may call the Federal Information Relay Service (FIRS) at (800) 877-8339, 24 hours a day, seven days a week.

The Service published a Notice of Intent to Prepare an Environmental Impact Statement and Socio-Economic Assessment for the Proposed Amendment of the Rule Establishing a Nonessential Experimental Population of the Mexican Wolf in Arizona and New Mexico on August 7 in the *Federal Register*. All comments received from then until the end of year will be used to prepare a draft proposed rule, a draft Environmental Impact Statement (EIS) and a Socio-Economic Assessment. Once drafted, those documents will go through a public review process. A second set of public meetings will then be held in a meeting format where members of the public may stand and deliver their opinions and views.

“Modifying a federal rule starts with finding out what the community thinks,” said Millsap. “This part of the process is called ‘scoping.’ From here we consolidate the comments and advice and come up with different alternatives which will be publicly vetted.”

Through this notice and the public scoping meetings, comments or suggestions are sought from the public, concerned government agencies, tribes, the scientific community, industry, ranchers, landowners and any other interested parties concerning pertinent issues that should be addressed and alternatives that should be analyzed. The Service will take into consideration all comments and any additional information received while developing a draft Environmental Impact Statement. All written comments, including names and addresses, become part of the supporting record and will be made public.

The notice can be found on the web at <http://www.fws.gov/southwest/es/mexicanwolf/>. Submit written comments directly to the Service’s New Mexico Ecological Services Field Office on or before Dec. 31, 2007 or at any of the 12 scoping meetings listed above. Send comments to U.S. Fish

and Wildlife Service, Attn: Wolf Program, New Mexico Ecological Service Field Office, 2105 Osuna NE, Albuquerque, NM, 87113. Written comments may be faxed to (505) 346-2542 or e-mailed to R2FWE\_AL@fws.gov. Guidance on sending comments is in the notice.

The information provided at the scoping meetings, as well as an opportunity to provide written comments, will be available on the Mexican Wolf EIS website, [www.mexicanwolfeis.org](http://www.mexicanwolfeis.org).

Questions regarding the scoping process or development of a proposed rule amending the 1998 10(j) Final Rule should be directed to John Slown at (505) 761-4782.

The U.S. Fish and Wildlife Service is the principal federal agency responsible for conserving, protecting and enhancing fish, wildlife and plants and their habitats for the continuing benefit of the American people. The Service manages the 97-million-acre National Wildlife Refuge System, which encompasses 547 national wildlife refuges, thousands of small wetlands and other special management areas. It also operates 69 national fish hatcheries, 63 fish, wildlife management offices, and 81 ecological services field stations. The agency enforces federal wildlife laws, administers the Endangered Species Act, manages migratory bird populations, restores nationally significant fisheries, conserves and restores wildlife habitat such as wetlands, and helps foreign governments with their conservation efforts. It also oversees the Federal Assistance program, which distributes hundreds of millions of dollars in excise taxes on fishing and hunting equipment to state fish and wildlife agencies.

-FWS-

For more information about the U.S. Fish and Wildlife Service, visit <http://www.fws.gov/southwest/>

## Appendix B: Representative Comments

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These comments represent the range of comments, thoughts and ideas expressed in the written comments submitted during the scoping comment period. The comments are arranged by category. In some cases the categories are similar, for example “compensation” and “depredation,” and comments could be placed in either one. Every effort was made to place comments in the most relevant category, as well as to avoid inclusion of duplicate comments. *Note: the comments are reported as written by the author(s). No attempt was made to correct grammar and spelling.*

## ALTERNATIVES

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Many letter writers made different types of suggestions on ways to improve the wolf reintroduction program.

- Finally, greater efforts must be made in resolving conflicts from both sides. Proactive education, training, and options to reduce conflicts are paramount.
- Use some professional mediators to help ranchers and environmentalists to come to some solutions to increasing the wolf population.
- Publish results of reintroduction efforts so as to educate the public on successes and to gain support for the program.
- The wolves and cattle must now live together so we must come up with a learned behavior that will teach the wolves to teach their offspring to avoid cattle and man in a manner that will hopefully carry on for an acceptable balance between man and beast. The use of automatically stimulated sounds that are repulsive to the wolves as they approach the cattle and or a strong “SHOCK” to solidly teach the wolf to run like hellfire!
- We also support the use of the following non-lethal measures examined by the Bailey Wildlife Foundation Proactive Carnivore Conservation Fund:
  - » multiple guard dogs
  - » electric night pens
  - » fladry fencing
  - » task specific range riders
- Use of fladry, rubber bullets and other non-lethal methods should be developed and employed to minimize wolf conflicts.
- Allow for maximum harassment of wolves by rangers and farmers including the use of rubber bullets. Furnish citizens with telemetry equipment as needed to help track problem wolves. Train county official to use harassment tools and telemetry to protect citizens on public property.
- Paintballs should be considered for use on private lands as a legal method of harassment when warranted.
- An alternative would be to buy a large ranch, fence it above and below ground and release all the wolves inside. A slight change in the endangered species act would allow this. It would preserve the wolf in natural habitat, remove the danger to the communities in and around the recovery area.
- Enlist the help of qualified and sympathetic individuals to assist with recovery efforts (like any federal agency the USFWS budget is strained).
- I believe the key to the success of the wolf reintroduction program is to educate and convince the ranchers opposed to the program that the cattle industry can thrive and prosper at the same time as a successful population of wolves in the wild.

## BOUNDARIES

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Many writers commented about the boundaries of the current program. Many wanted to expand the area, and some gave suggestions of possible expansion areas. Others stated that the current area is either inappropriate wolf territory or should not be expanded. Some writers wanted wolves to disperse and establish home ranges outside the current boundaries, while others do not. Several people also commented about the White Sands Missile Recovery Area.

- This expansion of territory would only be successful if the number of wolves in the population did not exceed your desired condition of 100 wolves.
- While boundary extension will undoubtedly save some wolves from premature removal from the population due to boundary infractions, it will do little to lessen conflicts with livestock.
- In the northern Rocky Mountains, wolves roam in areas where they are designated as experimental, non-essential and in areas where they are not so designated — and the Service has no rule requiring removal of wolves that cross any jurisdictional boundaries.
- We do not believe the entire proposed reintroduction areas were at any time wolf habitat. Secondly we do not believe you have done due diligence here to propose areas within land masses which are not conducive to this species specifically within municipalities as well as other sensitive military areas where the wolf population might be detrimental to the security of our nation as well as its threatening ongoing missions by the armed force in Otero County.
- Wolves from the Blue Range Wolf Recovery Area might naturally migrate here, rules permitting, but certainly the efforts for wolf recovery would be greatly improved by intentionally relocating wolves into the Grand Canyon eco-region and National Park.
- Please let wolves disperse outside the containment areas.
- Rules should be altered to allow the wolves to expand their territory naturally instead of politically.
- The geographic area where wolves are going to be released should also be expanded to include NM and other areas of the SW — the current area is too limiting.
- I would like the wolves to be directly released in New Mexico. I believe direct release in New Mexico will improve the chance of reintroduction of healthy wolves that will stay out of trouble.
- I favor an expanded area of initial release and allowing wolves to expand their territory so that their numbers can increase beyond the 100 minimum objective of the BRWRA.
- I believe that the wolves should have a safe route to cross roadways. Not only should the wolves have an expanded area in their territory, but they should also have a safe passage across roadways!
- It is important to expand the habitat - the area listed as “secondary recovery” should become primary territory open to wolf dispersal.
- Expand the current territory of the BRWRA and expand the area for initial releases to anywhere within the BRWRA.
- The last time I checked, wolves can not read maps or signs, so how are we to put boundaries on their territories and punish them for leaving them!
- I would also like to see the primary recovery zone & recovery area expanded. Perhaps we could have several dispersed recovery zones/areas.



- The current criteria that are required to be met before an attack or predation filing can be documented entirely too stringent and burdensome to be of any use for anyone to protect their property or personal safety. This is the reason I believe the wolf should only be in the central Gila Wilderness where there are no livestock or people. Outside this area, any wolves that are a threat to people, pets or livestock should be eliminated or taken by lethal means if necessary.
- Historically Mexican Gray Wolves were wildlife of Texas and the country of Mexico as well as the State of Arizona and New Mexico. Thus Texas areas should be included in the U.S. program: the Guadalupe Mtns, the Sierra Diablo Mtns, the Cornudas Mtns and the Hueco Mtns (both TX and NM).
- As managers of the Apache-Sitgreaves National Forests, we support allowing wolves to establish home ranges outside of the Blue Range Wolf Recovery. As wolves disperse to the western portion of the Forests, the western portion of the Lakeside Ranger District and most of the Black Mesa District have very low densities of people. Native prey such as elk are quite abundant in those areas and would provide sufficient food resources. Most of the range allotments in that area are six-month allotments, reducing the exposure of the wolves to livestock and the opportunities for livestock depredation.
- Wolves dispersing west of the current Blue Range Recovery Area may cause more nuisance problems in the more populated areas around Pintop-Lakeside and Show Low (PTS). Wolves will encounter more pets and stray domestic animals, interactions that will likely be detrimental for both wolves and pets. It would be critical that the White Mountain Apache Tribe (WMAT) continue to allow wolves on the Fort Apache Indian Reservation (FAIR), which would allow wolves to move to the west through the more isolated forests of the reservation.
- Project boundaries should encompass all of New Mexico and Arizona — no artificial boundaries.
- Shouldn't be primary and secondary release zones. Release zones should be scattered throughout both states and established where federal allotments are vacant and ample prey exists.
- Expand area for initial releases to anywhere within BRRA.
- Map all possible release sites in both states as part of the final EIS.
- Concern that expanding the area will increase Wildlife Services workload without any budget offset. And will detract from other predation damage management throughout the state.
- Mexican wolves should be allowed to naturally disperse to and move among suitable habitat throughout the MWEPA, with appropriate conservation and management actions applied, and with the MWEPA extended to include all of New Mexico south of I-40.
- Wolves over a larger landscape will limit WS and private applicator use of M-44s and the Livestock Protection Collar [creating] increased coyote predation.
- Mandate that the 200 sq. mile per wolf need be met before releasing the wolves into our state (NM).
- There are large areas of the Gila ecosystem that are not being used for the reintroduction, especially the interior area of the West Fork Gila and White Creek, where there are many elk and large distances from human activities.
- No restrictions on the movement, dispersal or establishment of territories by Mexican wolves outside the boundaries of the BRWRA.
- No provisions in a new rule should preclude or impede any conceivable proposal or action to achieve future recovery goals/objectives in any geographic area outside the current boundaries of the BRWRA.
- If no prey base exists within WSWRA, then no releases should be done.

- Certainly, we can sustain a larger (100 or more) in the presently defined areas. In addition, other areas near the north Rim (possibly), or the non-essential areas of Arizona, should definitely be included.
- Thus, “range” must mean “currently-occupied range” and not “historical range.” Therefore, by the agency’s own definition, geographical expansion of the Mexican wolf program is not warranted.
- The USFWS is now blatantly moving towards expanding wolves into non-historic range under the guise of “Mexican wolves” are now “Mexican gray wolves” which are really “gray wolves” and must have been interbreeding with wolves to the north.
- A decision to dissolve the existing boundary and allow wolves to disperse should be made upon the best available conservation biology and scientific data speaking to the vital role that dispersal behavior plays in establishing and maintaining genetically healthy wolf populations, and ecologically meaningful and ecologically effective wolf packs at landscape scales.
- Many ranchers I interviewed expressed an interest in expanding or dissolving the boundary because, from their perspective, doing so would increase support for their “side” as the wolf conflicts spread out over greater areas.
- The first and most important need in a new restoration plan is to eliminate ALL restrictions on movements and dispersal of individual wolves and wolf social units.
- The elevated trend in boundary-related removals (36% of all removals) remains a concern. The IFT then forthrightly adds its agreement to the position of noted experts that removal of wolves simply for being outside the BRWRA wastes resources, misleads the public, adversely affects recovery, artificially restricts the dispersal vital to long-term population viability — and is also in direct conflict with the FWS’ own “management philosophies” used on other projects.
- Therefore it is essential that agency actions are responsive and not idle when it comes to resolving livestock-wolf conflicts, thus enabling a program that allows this population to expand beyond its marginal subsection of the Blue Range Wolf Recovery area.
- As a result, because the amendment proposed for EIS analysis here — expansion of the areas into which the Service may release its captive-bred, alleged Mexican wolves — raises substantial questions of irreversible environmental harm by its very real potential to compromise the genetic integrity of the entire gray wolf recovery program
- If the wolves are not allowed to expand their territory, at least over into New Mexico’s Gila and Apache National Forests, then they will have a high likelihood of a population debacle.
- Expanding a reintroduction goal that can and should be met within the BRWRA to the much larger MWEPA is inappropriate and not supported by the ESA or any authorized project document.
- Natural dispersal may be the most effective means of establishing Mexican wolves in new areas and will be critical for wolf movements among core populations.
- An expansion of direct release areas and a generally broader geographical management area could drive that cost up exponentially.
- Livestock producers outside the current reintroduction area are strongly opposed to boundary expansion fearing the carnage they have seen their fellow producers suffer within that area.
- So, please explain to me how the two main agencies entrusted with the responsibility of reintroducing the Mexican Wolf into Blue Range Wolf Recovery Area and managing the program to mitigate the

impacts on livestock producers and rural communities here in New Mexico, can justify the expansion of the program by allowing wolves to establish themselves in areas outside existing recovery area without adequate funding and manpower to properly manage the program.

- The Grand Canyon Wolf Recovery Project is working with other conservation groups to eliminate and/or reduce roads in the Grand Canyon region and foresees that this will help facilitate the safe dispersal of wolves to this region.
- Allowing Mexican wolves to disperse and the population to expand into habitat deemed suitable by the wolves themselves is more appropriate for this population than the Northern Rocky Mountains wolf population where unlimited dispersal outside the nonessential experimental area is allowed.
- EIS should address other game species development programs, i.e., bighorn sheep, pronghorn antelope if it expands the boundary
- The original EIS of 100 has created the situation to force the boundaries to be expanded beyond the BRWRA.
- The Carroll et al study makes clear that wolves in other parts of New Mexico or Arizona will have lower densities, and thus expanded home range requirements, than those in the Blue Range Wolf Recovery Area, while at the same time road densities are higher in other parts of these two states.
- In subheading C, the recommendation also calls for allowing “wolves to disperse throughout the MWEPA, subject to management consistent with current Blue Range Reintroduction Project SOPs.” Yet, expanding the MWEPA and establishing a metapopulation conflict cannot be reconciled.
- The recommendation in the Five Year Review to possibly expand the experimental population area is phrased dishonestly and is designed to accomplish the opposite of what it explicitly states is its intent.
- Second, expansion of the introduction zone for captive-bred, alleged “Mexican gray wolves” south of Interstate 10, as the Service proposes, will have substantial international implications, both socio-economically and environmentally, on the citizens and environment of northern Mexico.
- Surveys show that more than 80% of Arizonans favor expanding the wolves territory in this state and protecting them from human predators.
- My understanding of the proposed expansion is that, by my living a short distance outside the “experimental recovery area” boundaries, any wolves that eventually wander onto my private land and start to kill my dogs, horses, poultry or cattle would enjoy the full protection of the Endangered Species Act.
- If wolves are not allowed to expand to their full natural potential then the coyote population will remain unchecked.
- Indeed, the case could be made that the current boundaries concentrate conflict in a small area, and that livestock producers would feel some relief if wolves were allowed to disperse over a wider area and into regions with lower livestock density (for example the Grand Canyon and Sky Island ecoregions).
- Wolf Boundaries and “Naïve” Releases. The FWS is well aware of how essential it is to the success of the Mexican wolf recovery program to allow wolf populations to expand and disperse into suitable habitats outside the boundaries of the current BRWRA, and of the necessity to allow “naïve” releases in New Mexico.
- The expansion of habitat without complete and adequate data, relevant information and analysis and with the due consideration uncertainties and adverse impacts is irresponsible and unauthorized.
- Please expand the area for initial releases to the Blue Range in New Mexico so managers have the necessary tools to assure the sustainability and viability of the packs.

- Under the existing rule, wolves that leave the BRWRA boundary are captured and relocated back into the Blue Range, which severely disrupts pack social structure and attempts at establishment, thwarts expansion and dispersal of the population, and sometimes causes serious injury to individual wolves, on whom the future of the subspecies directly depends.
- Mexican wolves can inhabit New Mexico through natural dispersal from Arizona or via relocation of captured wolves because of nuisance issues.
- Evaluate expansion of the reintroduction onto other public land.
- Specifically, expand the Blue Range Wolf Recovery Area to the north and west into the Grand Canyon ecoregion, to include the Grand Canyon National Parks a protected area for initial releases and relocations of Mexican gray wolves.
- While we are just immediately to the north of the proposed expanded boundaries (just north of I-40), we are very concerned about the eventual impact that wolves may have on not just our operation but on those of other southwestern livestock producers and rural communities as well.
- The introduction of such major predators as wolves onto privately owned, non-wilderness, non-wild working range landscapes, such as much of the proposed expanded recovery area (that which is not already settled or inhabited), especially in areas without a requisite prey base (excluding domestic livestock and pets), would be, in our opinion, ecologically unnecessary, economically harmful, and socially disruptive.
- While we understand and appreciate the argument that wolves have a place as “keystone predators” in “native ecosystems” (such as are still largely extant in Alaska or Africa’s Serengeti), we believe it can be demonstrated that most of the proposed expanded range is no longer a sparsely inhabited “wilderness” suffering from the lack of a keystone predator (human beings, and their ever improving management systems are functionally filling this niche) and that the costs of introducing wolves to our living spaces and working landscapes will far exceed their presumed and yet undemonstrated (in our geographic and ecological context) benefits to society, both at large and especially for the many “front-line” communities directly involved.
- If allowed to disperse from the BRWRA population, wolves would be attracted to suitable habitats with abundant prey along the Mogollon Rim.
- I would like to expand the recovery area boundaries to include all federal and state land in New Mexico and Arizona.
- Expanding our wolf population offers no threat to humans, as there has never been a documented case in the history of the United States of death by a wolf attack.
- Any large predator must be allowed to roam and disperse and hunt if that predator is expected to be self-sustaining.
- Allow the wolves to disperse beyond the recovery area, and to be released where biologists say is best, not where ranchers think they have god-given rights to bait and kill wildlife.
- Despite the fact that a vast expanse of public land could be open to Mexican wolves, the US Fish & Wildlife Service has been limited the reintroduction effort to a small area that is not only inadequate for a successful reintroduction, but does not conform to the standards set by the Endangered Species Act.
- There is absolutely no biological or scientific rationale for the current boundary or the current rule that requires the capture of wolves that disperse outside the arbitrary boundary.

- I'm writing to add my voice to those asking for the Final Rule to be as broad as possible in its provision for the gray wolf to expand into new habitats in the wild lands of New Mexico.
- Follow advice of biologists, not politically motivated bureaucrats, in determining appropriate release sites and allow wolf populations to disperse beyond initial recovery areas.
- The expansion of the wolves terrifies me because I live in a part of Cibola county that isn't heavily populated and I have a 2-year old daughter that loves to be outdoors.
- If this expansion is passed I know one little girl that will be broken hearted because I will have to tell her that it is no longer safe for her to play outside like she normally does.
- This expansion will not only affect my family negatively but every person I know living in the area.
- Almost everyone I've ever met has a beloved family pet and they would be in grave danger with the wolf expansion.
- The expansion of the reintroduction of the Mexican Gray wolves is unfair to the people living in Cibola and McKinley counties.
- I think it would only be fair if the people of Cibola and McKinley counties were able to vote on the expansion of the release.
- A brief review of monthly project updates from the Recovery Program make it clear that wildlife officials are already finding it difficult, if not impossible, to monitor and control even the small number of wolves for which they currently assume responsibility and expansion in size or number of recovery areas would only exacerbate those difficulties.
- To expand this program based on results to date would not be in the best interests of the citizens of the State of New Mexico.
- In fact, Carroll et al rate most of the region south of the current MWEPA as too arid, and therefore insufficiently productive of wolf prey animals, to allow for wolf breeding within a standardized wolf territory size of 504 square kilometers.
- For example, the San Mateos Mountains look fine to the wolf because of their high elk population and there is no major highway to stop them, and, it would seem they look fine to FWS as well because it is sparsely populated by humans.
- A second possible introduction site is the Carson National Forest, where a large and well-established elk population currently exists.

## WHITE SANDS

- If the White Sands Missile Range is unsuitable as habitat for the Mexican gray wolf, it should be removed as a recovery area, but an area of equal size should be provided for recovery in its place.
- White Sands has only been found "unsuitable" if wolves are required to stay within its boundaries, but as part of a population that interacts with wolves in Gila, it would serve an important role.
- Unless and until wolves are systemically monitored interacting with Oryx we believe that it would be premature to totally eliminate the White Sands reintroduction option.
- It is difficult to provide substantive comments and comment on the White Sands Wolf Recovery Area without knowing which BLM lands might be affected.

- White Sands Missile Range eliminated as “reintroduction” zone, but remains potential dispersal habitat White Sands Missile Range may not contain appropriate habitat for reintroduction or provide prime Mexican gray wolf habitat. However, when recovery boundaries are eliminated White Sands Missile Range could provide a “stepping-stone” dispersal route for wolves moving to other suitable habitat.

## COMPENSATION

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Many responses indicated that the current compensation was not enough to cover the “true” costs associated with depredated livestock. Some people thought the compensation amount was fair. Others thought the government should pay the costs. Several people suggested alternatives for the current system of compensation.

- A depredation compensation program should be established for domestic pets and “companion animals.” Compensation should take into account the emotional impacts of such losses.
- Consider an incentive program that would pay an upfront fee to ranchers based on the number of wolves using the allotment.
- Reimburse for emotional costs, including therapy if necessary due to the threat of wolves and loss of pets.
- Pay for fences around schools and shelters for kids waiting for the bus.
- Pay for additional fencing or other structures to protect livestock and animals not considered livestock.
- Implementation a federally funded pilot program aimed at compensation and interdiction to be run by ranching interests who are the experts in the field of livestock depredation causes and interdictions.
- The calculation of “depredation values” for livestock should consider not just the sale barn “market value” of a particular animal, but also the opportunity and replacement costs (replacement cost is more appropriate than the market cost of a “cull animal”), special genetics (especially in the case of expensive breeding stock), the value of having an animal acclimatized and habituated to a particular environment and pasture layout, and the value of any previous training or handling/conditioning that they may have received.
- Subsidized ranchers should not be treated differently from the public who use public lands and they should not receive any special allowances for their carcass disposals.
- Nor do the payments made by the NGO’s take into consideration the value of lost genetics or lost production of livestock. Nor do they take into account the loss of weight gain of livestock that are being harassed by wolves.
- If ranchers are being asked to change their practices to accommodate the reintroduction effort, then perhaps a compensation program to support them in making those changes would be in order to soften the effect of requiring they change their practices if one does not exist already.
- Allow an annual compensation for livestock owners whose concern for threat by livestock-wolf conflicts inhibits the progress of the reintroduction objectives.
- I also think ranchers could be compensated for picking up the cow carcasses which seem to cause so much trouble for the wolves.
- I have done some investigating and it appears the Arizona/New Mexico wolf project may be the only US wolf program where the owners of working/hunting dogs depredated by wolves are not compensated.
- I find it offensive that you expect the owners of working dogs to stand by and allow wolves to kill valuable animals without compensation that is provided to dog owners elsewhere.

- Working together seems like it could be the key to success. As I understand it, if a calf, etc. is killed by a wolf or other predator there is a tedious process to get compensated for the loss. Can you eliminate that process, provide a monthly or annual payout to ranchers and have them become part of the protection — protect the wolves and protect their compensation and prevent the problems at the end.
- The Wildcat Photo-Survey Contest offers incentives to conserve area wildlife and provides indirect compensation for cattle losses due to jaguar and puma predation.
- Any depredation compensation programs should not be dependent upon private NGOs who may or may not be reliable in terms of indefinite and open ended commitments or possess the potentially unlimited resources to answer future wolf depredations on property (domestic livestock, horses, and pets) and possibly persons.
- Perhaps some form of “no fault” calf loss insurance could be developed, based on actuarial and statistical methods that compare a range of historic livestock loss probabilities for given causes and given locations; any losses in excess of such expectations might be eligible for compensation.
- A depredation compensation program should be established for domestic pets and “companion animals.” Compensation should take into account the emotional impacts of such losses.
- If a wolf is feeding on a livestock carcass the owner should be compensated for it no matter what caused the death of the animal.
- I think a system using calf crop records before the introduction of the wolf compared to current calf crop numbers after wolf introduction should be instituted to reimburse livestock owners.
- Implement a federally funded pilot program aimed at compensation and interdiction to be run by ranching interests who are the experts in the field of livestock depredation causes and interdictions.
- Takings implications assessments must be planned for and implemented in scoping rulemaking and management planning in order to determine the scope of compensation necessary to private property owners for depredation and losses caused by the program.
- Finally, where ranchers can document that the presence of wolves has caused economic loss such as inhibited weight gain or impaired fertility, ranchers ought to be reasonably compensated for this type of loss as well.
- Instead of focusing on determining exactly which wolf killed exactly which cow, when and how, the program needs to switch focus to working with groups external to the government and establish compensation for ranchers — not on a per-kill basis, with no positive incentives for modifying ranching practices to deter predators — but towards a positive incentives based program that pays ranchers to protect wolves.
- Rather than framing incentives negatively for wolves — like reducing grazing fees where wolves are present, which presents it as a negative that wolves are present by reducing the value of the fee — the incentives need to be framed in the positive, such as paying ranchers for the density of wolves in their area.
- Whenever a property is impacted adversely by the wolf introduction program, the government should offer to buy the property at market rate and attach it to the wild area in perpetuity.
- Penalties should be exacted for non-compliance, including refusal of compensation for preyed-upon cattle.
- Not only has this program not provided for full compensation for financially impacted entities, but it ignores the responsibility of the federal and state government to compensate their citizens for actions that result in take of private property.

## Appendices

- It has proven impossible to confirm all losses associated with the program to the satisfaction of NGO's responsible for compensation and to private property owners largely because of the size of the country the program is taking place in.
- Reliable scat data on what wolves in the wild are actually eating is essential not only to science-based policy and management decisions, but to any programs proposed for providing additional compensation for depredations.
- The official Catron County 16 non-negotiable demands (a seventeenth was added on the spot) issued in July 2005, combined with the reintroduction opponents' preemptory rejection of almost open-wallet, county-administered depredation compensation as "socialist" should have been an epiphany for the FWS official in attendance.
- Even if the loss was 350 livestock, almost all are compensated for and the number comes to only 35 livestock killed per year for the past 10 years of wolf reintroduction; that number also represents, at most, 1% of all the livestock on public land in the primary and secondary recovery zones — hardly enough to halt the wolf recovery effort in spite of the individually relatively high reported losses to a few marginal livestock operations, one manager of which openly admits to enticing wolves to predate on the ranch owner's livestock.
- For purposes of reimbursement, abandonment of the practice of specific identification of wolf kills should be encouraged.
- One has a greater chance of getting fair market value out of a mansion surrounded by crack houses than he does from selling a cattle ranch with a resident pack of habituated wolves; at least the crack houses are not protected by the full force of the federal government!
- In that case, I'd like to see an ability to study how much a rancher within the study area might lose to wolf predation, and a method to pay them that 10-15% off the top, so they may feel supported and could be encouraged to use it to help the recovery project and also protect their livelihood.
- I would most happily contribute both my taxes and private contributions to one type of incentive — fair compensation for permanent retirement of grazing allotments in the BRWRA.
- One possible model for an incentive program is the Swedish program of compensation for the presence of carnivores in areas grazed by reindeer herds belonging to the Sami people.
- The use of the term "conservation incentives" in this recommendation is welcome and long overdue, particularly in the light of the total rejection by ranchers and country officials of a proposed compensation scheme that would not require confirmation of every kill put forward by the New Mexico Department of Agriculture at a meeting of Governor Richardson's Catron County wolf task force (of which I was a conservation member).
- Further, any compensation program which would drain money from the already well-documented under funding of staff actually engaged in the work of reintroduction and recovery would simply be a back-door stratagem to reduce or eliminate the reintroduction program; it also would directly impede the statutory mandate to recover *Canis lupus baileyi*.
- There is growing evidence, both in the literature and in the non-negotiable demands of the Catron County Commission, that compensation programs will not erase opposition to wolf reintroduction.
- Perhaps it would be more acceptable to ranchers for the administration of the reimbursement to be taken over by a citizen committee of their peers, or some form that is more acceptable to them.
- If they are released I would require compensation enough to be able to retire from the ranching business or build a fence that will keep the wolves out.



- Why not pay Defenders of Wildlife (through a contract) to pay livestock owners for more than the value of stock that is killed by wolves. Twice as much as the value of the livestock, with periodic adjustments of the “depredation payments?” This would give livestock owners an incentive to protect the wolves.
- But if you insist on putting the wolves there and you guarantee that the rural people are safe, why not make a cooperative arrangement with the ranchers? Pay them in advance for livestock losses and their cooperation.
- Any new analysis to further the wolf program should require the government to pay all the damages caused by wolf predation since the inception of the program. Defenders of Wildlife (DF) are pro wolf and should be taken out of the picture. There is no guarantee that DF has the funds or will continue to fund the loss of livestock since they are anti livestock and pro wolf.
- Perhaps some form of “no fault” calf loss insurance could be developed, based on actuarial and statistical methods that compare a range of historic livestock loss probabilities for given causes and given locations; any losses in excess of such expectations might be eligible for compensation.
- Another way funding could be beneficial is to help with fence repair costs, particularly when permittees are given the option to use a pasture on another allotment if wolves are denning or being released particularly where young calves would be.
- There is no evidence that the lack of a federally funded livestock compensation program “remains a huge impediment” to acceptance of reintroduction.

## DEPREDATION

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Discussion of wolf depredation of livestock was a common theme in many of the letters sent to the FWS. Writers were divided about how best to handle depredation.

- Please refine the definition of one “depredation incident” to mean one domestic animal having been bitten by one wolf within a one-hour time period.
- DNA analysis makes it possible not only to determine whether wolves were in the area of depredations, but in many instances would disclose the identity of the particular wolf who fed on the carcass.
- Accounting for missing calves needs to recognize that a carcass will not always be available for inspection (a knowledgeable observer will recognize a tight-bagged cow as having lost a calf), and consider the revenue that the calf would have likely realized at weaning.
- There are many professional wolf managers who do not favor a carcass removal requirement and do not agree that it will do anything positive towards eliminating or minimizing depredation.
- This should come in the form of a federally funded pilot program aimed at compensation and interdiction to be run by ranching interests who are the experts in the field of livestock depredation causes and interdictions.
- Biologically, wolves scavenge, so wolves that scavenge on livestock carcasses (that died of reasons other than their own depredation) **MUST** not be considered “nuisance” or “problem” wolves.
- Pletscher found no relationship between depredations and carcass disposal methods, calving locations, calving times, breed of cattle or the distance cattle were grazed from the forest edge.
- More likely causes of depredations, they felt, were forests or places with a high percentage of vegetative cover, within a wolf den area and where there was native prey use in the same pasture or locale.

- I and many others have been contributing to Defender's depredation compensation fund for as long as there's been one because we want to help ranchers stay in business and stay on the land.
- But the bad news is that removals for livestock depredations are rising steeply, accounting for the permanent removal of 24 wolves from 2003-2006-nearly 90 percent of all removals.
- Livestock carcasses should not be buried on public lands and definitely not incinerated because of potential wildfires.
- I oppose the use of lime to render a carcass inedible to wolves and other scavengers.
- Subsidized ranchers should not be treated differently from the public who use public lands and they should not receive any special allowances for their carcass disposals.
- Livestock carcasses are not comparable to native wildlife carcasses and the non-native carcass litter must be removed at whatever financial cost to the owner and as soon as possible.
- I also think ranchers could be compensated for picking up the cow carcasses which seem to cause so much trouble for the wolves.
- ... wolves that scavenge livestock carcasses should not be defined as nuisance or problem animals.
- Wolves are attracted to and often scavenge on these carcasses (livestock), and may begin to prey on live cattle or horses nearby.
- The coordinator of the program stated in Glenwood that there is no statistical evidence that wolves become habituated to cattle by feeding on dead carcasses, which is the main argument of the so called environmentalists (most of whom live in cities and have a preservationist rather than conservationist ethic) whose true agenda seems to be to get cattle off public land.
- It should be noted that the groups proposing a mandate for carcass removal are on record for having as their goal "putting ranchers out of business", and that this proposal may be as much to harass ranchers as it is to presumably prevent wolves from developing a taste for beef.
- Requiring ranchers to remove carcasses killed by wolves is indeed adding insult to injury.
- Livestock operators should be responsible for making their cattle less available to wolves, through such efforts as fencing, guard dogs, quick removal of carcasses and range riders.
- The burden of proof before eliminating or removing wolves from a given permittee's operation should be with the rancher, to prove that adequate measures were taken to prevent conflicts with wolves and prevent them becoming dependent on scavenged livestock carcasses.
- Not only should carcasses be thoroughly examined, the ranch practices of branding near wolf dens and baiting wolves with live cattle — leading to predation — should be considered in every case.
- These events and the possibility of other sabotage by ranchers clearly show the extreme importance of ending the ill-advised "three strikes rule" and making sure that the new rule and the proposed interdiction fund reward ranchers for the presence of live wolves and for responsible livestock husbandry.
- And no wolf should be removed by any means before the rancher has attempted to mitigate potential conflict with wolves through carcass removal and the use of livestock guardian dogs, or before the allotment itself has been properly evaluated as appropriate for stock grazing.

- Additionally, any change in the rule that would fail to classify those wolves who scavenge on livestock carcasses as problem wolves and that would place the blame for this bad behavior on the rancher himself, also flies in the face of common sense.
- Please make ranchers remove dead cows before a wolf finds it.
- Ranchers must be required to either remove dead cattle or make the carcass inedible.
- I have heard that some people use dead cattle carcasses to tempt wolves so that they can shoot them. I think that this type of behavior is unfair and should be stopped by having severe consequences for this type of behavior towards the wolves.
- Require ranchers to remove carcasses of dead cattle to reduce the possibility of wolves developing a taste for bovine meat.
- In particular, as a wildlife biologist, I feel that the wolves should be allowed to re-establish outside of the BRWRA, and either there should be more lenience toward wolf predation on livestock OR a core area where livestock are prohibited must be established.
- Ranchers lose more cattle to disease and other predators than to wolves.
- Wolves depredating on livestock not legally present should be granted amnesty from the “3 strikes” process.
- Make ranchers that use public lands, to carry insurance in case they loose any animals to wolves or any other predators; they can be compensated.
- Need to look at the Minnesota version of determining a depredation and follow this version.
- The Service already has the authority to revise the definition of “depredation incident” and shouldn’t be going through rule-making to do so
- The Service should be enforcing the plain language of the existing rule that defines depredation.
- By reducing meso-predators, especially coyotes, an increased number of wolves may actually reduce the net loss of livestock.
- Ranchers who persist in leaving cattle carcasses to rot on federal land must be fined and compelled to clean up their messes.
- The revised rule should provide for flexibility in actions associated with depredation incidents that is consistent with the circumstances, location, wolves involved, livestock management practices involved, people involved and other salient factors.
- One suggestion is coating carcasses with lime so wolves don’t become habituated to eating cattle.
- I volunteer at a wolf research center in NM. I have observed that these wolves work well as a pack if they are kept together and if the mother teaches the pups to eat wild game instead of cattle.
- Carcasses of all animals which die in the wild are valuable resources for all other animals and plants in the ecosystem. Removal of any type of carcass denies many other species including microorganisms, insects, rodents, birds, etc. food and other important carcass by-products.
- Have you ever tried to reintroduce wolves to elk/deer meat? I think if a wolf group is preying on cattle you should try to leave wild meat carcasses.

## DESIGNATION

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Many writers wanted to reclassify the Mexican Wolf either as endangered or as an “experimental, essential” population. Others suggested dropping the program altogether, or not reclassifying anything.

- A Conservation Alternative to the existing rule should include a reclassification of the BRWRA population of Mexican gray wolves as either endangered or as “experimental, essential.”
- If reclassified as “experimental, essential”, an absolute limitation on taking of Mexican wolves from all causes (legal, illegal and agency management actions) — except for the immediate defense of humans — such that the BRWRA population increases annually by at least 15 percent numerically and by at least two breeding pairs (per existing Fed Reg definition) based on the official end-of-year population count until the 100+ wolf objective has been met. Provisions should be included to allow and require the FWS to immediately reduce authorized take for all subsequent years following years when this conservation goal has not been met.
- The current designation of ENE is wholly inappropriate and should be immediately abandoned. The ESA authorizes and requires FWS to list *Canis lupus baileyi* as separate and distinct from *Canis lupus*, thereby affording this subspecies with the full protections of the Act.
- The termination of the introduction effort should be a legal and reasonable option for a new EIS.
- Experimental status may be useful and necessary at this time but essential status is desirable as soon as possible.
- If they are truly endangered, they should be kept in captivity.
- Please change the classification from “experimental, non-essential” to “experimental-essential”
- I am in favor of changing the classification to experimental, essential or endangered.
- Mexican Gray Wolf should be re-designated as an endangered species and their recovery should be priority for FWS.
- Reclassify the population to “experimental, essential” — they are the most genetically distinct subspecies of gray wolf in North American — needs this additional protection.
- Fourth, fundamentally, the FWS needs to reclassify the Mexican wolf as a separate DPS (distinct population segment) because at this time they only are a nonessential experimental population.
- A primary overriding goal of achieving the current, but partial, recovery objective of establishing a viable, self-sustaining population of at least 100 Mexican gray wolves within the current geographic scope of the BRWRA with no upper limit on the future number of Mexican wolves within the BRWRA or any larger geographic area.

## DISEASE

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Some people were concerned about the problems with disease and wolves.

- There is a growing rabies problem, mostly spread by raccoons, and it seems that raccoons are the number two choice of food for Red Wolves.
- Through research I have found that wolves spread many diseases especially in their feces.
- It is our understanding that there are no licensed vaccines approved for use in wolves, so it is not legal to vaccinate wolves with rabies vaccine in New Mexico.
- The effects of wolves on watershed spread of disease on domestic and wild animal populations need to be addressed.

- An analysis of problems associated with epizootic disease carried by wolves and potentially carried in wolf feces needs to be done.
- There are several zoonotic diseases of concern, especially those that are shed in feces and urine. Some of these zoonotics passed in feces that can cause disease in both humans and livestock.

## DOMESTIC ANIMALS

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Interaction between wolves and people's pets — house dogs, working cattle dogs, and other pets — was a subject that received many comments. Many people discussed whether “take” of a wolf should be allowed when it kills a pet.

- Under the language of Recommendation 10, in the context of the language of Recommendations 5 & 6, the AMOC and FWS could permit wolves in the wild to be re-extirpated for killing fewer than 100 domestic dogs on private land or 100 livestock on public land.
- The recommendation to delegate to private parties the ability to use non-lethal but highly disruptive means, such as explosions and supposedly non-lethal rubber bullets, against wolves attacking domestic dogs on public lands would be a blank check for reintroduction opponents to induce miscarriage, the abandoning of den sites and pups, and generally totally disrupt the complex pack structure of wolves — resulting in AMOC and FWS permitted decreased reproductive success and increased mortality among wolf pups.
- The recommendation to delegate to private parties the ability to kill wolves allegedly attacking domestic dogs on private lands would immediately result in baiting of wolves by reintroduction opponents who would, of course, deny access to their land and operate in complete obscurity and with complete impunity.
- Absent extremely careful oversight and difficult investigations by law enforcement (already overstretched, to judge by their track record in solving cases of illegal take so far), there is little to prevent an unscrupulous wolf opponent from obtaining a stray dog, chaining it in his yard near a couple of beefsteaks, and dispatching any hapless wolf that comes to investigate and attacks the dog.
- We cannot support, nor does the 5-year technical review and subsequent project data support, the issuance of permits to kill Mexican wolves in the act of attacking dogs.
- TRI can support the issuance of permits for the non-lethal and non-injurious harassment of Mexican wolves engaged in nuisance behavior or attacking livestock or pets.
- Of special concern are “working ranch dogs” which are valuable ranch assets not easily replaced.
- Being able to defend your dog would not lead to overt killing of wolves.
- My dogs are my service animals, and my dogs and cats also are like my children, and if something is injuring them, especially in my own backyard, I should have every legal right to protect my animal, be it from a Wolf, Javalina, or what have you.
- Private citizens also have broad authority to harass Mexican wolves for purposes of scaring them away from people, buildings, facilities, pets and livestock Specific language is needed to state [they may kill or injure them if threatened by them or in defense of another who is threatened], and may, [kill a wolf that is not responding to harassment and is consistently in populated areas frequented by people and showing signs of being desensitized to human encounters.] It has become apparent that these are necessary changes as shown by the increase of human encounters listed in the 5-Year Review and those that have been documented beyond that review.
- Never relocate, translocated or re-release any wolf to the wild which has exhibited any habituation behavior or has killed any domestic animals.

- Pets should be kept on leash while they are in the National Forest or on Public Lands.
- Domestic pet owners should not be allowed to shoot a wolf on public lands.
- I wholeheartedly support the right of pet owners to use any lethal means to protect their pets, within the limitations of existing Arizona or New Mexico statutes.
- Even a well-trained stock, guard or hunting dog, which are valued literally in tens of thousands of dollars, would have no protection under the proposed rule.
- Advising people that they should take precautions and be aware of the potential for conflict with their pets is tantamount to saying that you shouldn't take pets into the recovery area because you can't do anything to protect your animals if they are attacked.
- I hate to surprise and disappoint hard-working government bureaucrats but I wholeheartedly object to any proposal that increases the number of wolves my pets, livestock, family, neighbors or I will have to encounter in our lifetimes assuming I choose not to sell the property, especially not in a market artificially depressed by the imposition of this rule.
- Pet owners can take fairly simple precautions to keep their pets safe.
- Almost everyone I've ever met has a beloved family pet and they would be in grave danger with the wolf expansion.
- Amend rule 10(j) to include the authority to harass Mexican wolves for purposes of scaring them away from people, buildings, facilities, pets and livestock.
- They should be able to kill wolves that are harassing livestock, pets or poultry on private property, without having to wait until something is killed, or badly crippled.
- It is a fundamental American right to be able to defend one's property, which includes one's pets from danger.
- My only area of disagreement is the legal stipulation, posted on signs all over the White Mountains, that states that you may not legally "Kill or injure a Wolf that attacks your pet (including working and hunting dogs), regardless of land ownership (private, tribal, or public)." As the owner of valuable working dogs, I find this stipulation patently offensive and believe that it potentially alienates large numbers of people who would otherwise support your efforts.
- In addition, any changes should also reflect the need for responsibility on the pet owners part; if the owner is camping and the pet is allowed to run loose, that is not responsible behavior on the part of the owner, whereas a pet that is kenneled or staked within a campsite and then attacked should be deemed a more serious situation.
- I have done some investigating and it appears the Arizona/New Mexico wolf project may be the only U.S. wolf program where the owners of working/hunting dogs depredated by wolves are not compensated.
- It is the responsibility of people to protect their domestic animals.
- Domestic dogs are not just "pets" to a ranching community although the psychological importance of pets should not be discounted. Domestic dogs are also used in the management of cattle and therefore have a significant economic benefit to the small scale rancher who may find human labor prohibitively expensive.
- One possible solution to addressing this issue would be to state that once the wild wolf population reaches a certain level (250 or 500 for example), or once there are X-many breeding pairs, then a protocol would kick in that would allow for the protection of pets on private and TT lands when they are in imminent danger of a wolf attack.

- People should be allowed to protect pets from wolves using any humane non-lethal means (like pepper spray), but discouraged from taking pets into wolf recovery areas.
- Changes that would allow private property owners to kill wolves that are within three hundred yards of a residence threatening people, pets, fowl, and livestock.
- I'm in favor of hazing wolves that hang around domesticated areas and may be attracted to those areas because of domesticated dogs-but I am not in favor of killing wolves to protect a pet; not at this point in time, when there are approximately 60 wolves in the wild.
- But again, the mere presence of a wolf within the vicinity of a pet should never be grounds to kill the wolf-and should this rule change be made, the criteria should be spelled out very carefully and very clearly as to what constitutes a direct threat by a wolf to a domestic pet. (I would also like to state that I do not think that the rule should ever allow the taking of a wolf to protect a pet while on public land-exposing a pet to the risk of wild nature on public lands is a responsibility the pet owner needs to assume.)
- Pet owners need to be educated of the risk wolves pose to domestic animals and be encouraged to leave their pet at home, or to carry pepper spray, a large staff or an air horn to ward off a wolf attack.
- Lethal control methods must always be available to manage depredating wolves that attack livestock, pets, and working dogs; threaten human safety; and negatively impact other wildlife.
- Just an idea if you haven't tried it...put a taxidermied cow or steer in with the wolves before release and use the solar panel dog wire shocker.
- Allow people non-lethal retaliation on private land when pets are threatened or the wolves are within x distance from human habitation.
- Our dogs are our pets but we count on them to work our cattle as well. We definitely need to be able to defend them.
- I don't think that owners of domestic pets have a right to shoot wolves if they eat a pet.
- I support the right of a dog owner to protect their dog, however pulling a gun could likely result in injury to the dog or another human. Avoiding contact between dogs and wolves by restraining the dogs seems a better solution.
- More intensive non-lethal harassment should be permitted in all cases to protect domestic animals & livestock.
- I believe that some sort of defense of pets, i.e., pepper spray, should be allowed if pets are on leash while hiking.
- Do not broaden circumstances for regulated take. For example, the proposed allowance for the public to kill wolves attacking pets should never have been seriously considered ... It is easy to see how wolf reintroduction opponents could use dogs for baiting, and opening this possibility would greatly frustrate law enforcement efforts to distinguish between legal and illegal take.
- Pets killed on public land shouldn't be the responsibility of the state.
- Service should not allow the killing of Mexican wolves to protect domestic dogs – this has no place in a rule that is legally required to promote the recovery of critically imperiled sub-species. Otherwise, the Service would be promoting an invitation to illegal killings.

## **EDUCATION/INFORMATION**

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Some people wrote with suggestions for education and training for the public, as it relates to the program or how to deal with interactions with wolves.

- It is essential to direct the public relations members on the project, both at the IFT and within the broader agencies involved, towards a more educational approach aimed at dispelling myths about the Mexican gray wolf and teaching all ages about the wolf's biology and importance in the landscape. This approach must be applied in the rural communities closest to and potentially most affected by wolf recovery.
- When requesting an area closure, I think it's important to sign the closed area.
- Guidelines need to be developed and workshops conducted so the public is aware of potential liabilities and rights in protecting private property, assets, and pet.
- FWS reasoning and science behind FWS definitions such as "Breeding pair" and "depredation incident" should be shared with the public and professionals at Land Grant universities in states that bound the recovery area to improve communication and education
- A wildlife biologist needs to be designated as the spokesperson for the wolf — so the wolf will have a voice.
- Improvements of wolf monitoring need to occur so residents in release and recovery areas are informed.
- Better suggestions might be to provide additional training for the public (e.g. public service announcements, etc.) and to post additional warning signs throughout the BRWRA, where the majority of conflicts arise.
- No expansion should be considered or implemented without full consultation and cooperation of the local jurisdictions concerned, including proper training and full contingent funding for the health and safety authorities, who would necessarily become involved.
- Launch an aggressive education program to help people in areas with wolves to deal with perceived problems (ex. paintball guns, bright lights...)
- Educational outreach regarding wolf behavior is one of the significant achievements of the reintroduction program and all of the IFT should be complimented on augmenting the efforts of the designated team member responsible for public outreach.
- If public outreach from the project is not available in the larger, two-state area, it is likely that the gap in public education on wolves will be filled by individuals and groups who may be less objective and less well informed than project personnel.
- As long as private citizens have been educated and warned about the potential conflicts the Mexican Gray Wolves pose, it is their responsibility to avoid engaging in behavior that might attract these animals to encroach on their private land.
- All residents within the wolf recovery area need up-to-date common sense wolf education programs.
- Clarification will help wolf release educators provide a unified message more clearly and effectively.

## **GAME & PREDATION**

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Hunters and other people were divided about whether hunting opportunities would improve or decrease with the presence of Mexican Wolves in the area.



- Why did the USFWS service put out the misinformation that wolves make for healthy deer and elk herds? When reading studies I find that wolves can completely wipe out deer, rabbits and musk oxen and reduce moose to such low numbers hunting has to be closed?
- If the numbers of elk are too great, the solution is simple. Just give out more hunting permits. My friends who are hunters have waited up to 14 years for a permit!
- The presence of wolves can also improve the hunting experience (makes elk/deer more wary).
- Wolves aren't dangerous and are necessary to the health of our ecosystem. For example, could prevent wasting disease in mule deer.
- There are sufficient land and elk to support the number of wolves stated in the goals.
- The rules for ranchers who graze livestock on public lands must be changed to give the wolves a fair chance to thrive on elk, their preferred prey, rather than cattle.
- As someone who has had a near-attack on my children by a cougar in Arizona (one conditioned to hunt in an area protected from hunting), I see wolves, as a missing part in the ecosystem, may help reduce cougar density and keep these predators in a more proper balance.
- Because of no game management, drought, etc., most of the game has moved onto the grazing allotments and private land where, salt, water and more palatable vegetation is readily available.
- Is there a way to have a sort of wolf training area at Sevilleta where wolf packs, one at a time, are put into a large well-fenced acreage with some elk and left on their own?
- Since wolves hunt to survive, could the hunting in those areas be limited?
- Deer and elk populations don't offer enough sustenance to feed populations of more predators than we already have.
- On a five-day fishing trip on the East Fork of the Gila River, along Diamond Creek, I watched a wolf run down a cow elk and her calf. The desperate vignette reminded me of the hard existence of both the wolf and the elk — both facing different forms of death.
- It is a wilderness with no in holdings, they are keeping the elk and moose from trashing the stream beds and culling animals.
- The reasons behind this are that the current number of deer and elk population is not accurately portrayed.
- Use of elk is 85% of confirmed kills.
- Too many predators and the wolf reintroduction program will cause an unbalance of the natural predator-prey percentages which will cause other animals to be adversely affected.
- More intensive and widespread data should be collected on wolf diet using scat studies from throughout the recovery area rather than one point and time date that leads to an incorrect conclusion that wolves are eating 75% elk as noted on a pie chart in the scoping and educational posters.
- Their influence on the behavior of elk helps to restore the riparian areas which are critical to many other species of birds and wildlife.
- Hunting is a purely optional pastime.
- Their maintenance and that of their habitat is more important than short-term goals such as livestock preservation (cows are raised everywhere!) or hunting pleasures.

- Fish and Wildlife Service, You all must read Aldo Leopold's book which has a chapter toward the end on how proud he was to kill a wolf to protect game so that HE could hunt them — and how ashamed he was later when he realized how important predators are to the preservation and health of their prey.
- Wolves in Yellow Stone National Park are doing much better than the Mexican Grey Wolf because of the restrictions on hunting in a National Park.
- Mule deer are declining throughout Arizona, no doubt in part to competition with elk.
- As you aware, wolves in the Northern Rockies have caused resurgence in deer populations, as elk are their preferred prey, not deer.
- Recently, Rocky Mountain National Park (RMNP) was opened to “sharp shooters” in order to cull the over abundant Elk population, had wolves never been eradicated from Colorado we wouldn't need to send in hunters.
- Having a functional wolf pack in the area would help to re-establish an appropriate predator-prey balance.
- Our elk population is strong and I think having wolves in the area would begin to bring things back into a more natural “balance.”
- As a hunter, its sad to see what may happen to all these excess elk who may have to be eliminated by government hunters when hunters would be willing to reduce the population in a controlled way as has been done by restricted hunts at the US Air Force Academy near Colorado Springs. When there are no natural predators, we leave ourselves open to all kinds of problems.
- If there are too many elk, there are probably not enough wolves!
- This is important because the trophic cascade is not dependent on direct predation of the elk; even if elk numbers are not significantly affected by wolves, the positive ecological effects can still be realized.
- As has been fully established in Wyoming and Montana, the stream habitat and strength of elk and similar species is actually improved in the presence of wolves.
- At this time, the wolves in the Mexican wolf program kill elk calves and domestic animals for the sport of it, not for food; in years to come if this is allowed to continue, there will be no elk or deer herds left.
- It is true that a healthy wolf population would keep elk and deer herds healthy and balanced; however, healthy wolves are never habituated wolves.
- When there are predators, the elk may not be as easy a target for hunters and those who make their living from always guiding hunters to a kill but the rest of the natural system will benefit greatly.
- When natural predators are present, elk and other game would be naturally fearful and less prone to hanging around grazing so hunters might have to actually track and hunt rather than waiting for one to appear at a designated spot.
- When wolves were introduced to the Yellowstone area, it was also observed that resident elk become more wary and stopped congregating near water, and in large groups, which damaged their environment.
- I think there is enough for all, and this need to limit wolf populations to make deer and elk more available to human hunters becomes an unfounded, and sometimes irrational argument.
- Deer carrying whirling disease, rabbits carrying tularemia, and other species carrying diseases would be the easiest prey for wolves.
- Maybe you should be thinking about reducing human hunting in wolf areas so that more deer and elk are available to the wolves.

- To try and use the excuse that the wolves predation of elk and caribou is too great but the fact is the northern Rockies states and Alaska are reporting 17-20% above the projected numbers for elk and caribou and their numbers are at record high levels according to the FWS.
- Other than the obvious impact of wolves depredating on livestock, how are wolves impacting elk herds and what impacts are those herds having on agricultural lands within and outside the boundary areas?
- In fact deer densities may be quite similar to prey availability in other Chihuahuan desert environments in which Mexican wolves evolved; wolves survived in such locales by roaming vast home ranges to find sufficient prey.
- Wolf populations may have comparatively higher densities in alpine coniferous forests that support larger populations of elk and deer than in dryer lower elevation areas.
- On the Kaibab Plateau, a high prey density of mule deer, ranging from eight to thirteen per kilometer is present.
- Those areas below the Mogollon Rim where the Pipestem Pack and the Mule Pack were released had so little prey base that livestock and pets were the only animals, the biologists said, were killed by the wolves.
- In addition, nobody can know for sure whether Mexican wolves may be able to prey on vulnerable oryx that have been introduced to White Sands.
- Wolves in Unit 27 of Arizona have had enough impact on the elk herd that permit numbers have been lowered.
- Without wolves, deer and elk populations have been artificially inflated and in some cases, like on the Kaibab Plateau in the early 1900s, populations increase far beyond carrying capacity and severe damage to the ecosystem results.
- How has the introduction of the wolf impacted the migration of elk within the recovery area?
- The data collected for this model is only one year's worth of data and by no means gives us enough information on elk/wolf interactions.
- It is suspected that Mexican wolf packs have impacted elk and deer populations in our area; study of actual ungulate population numbers is imperative.
- Theoretical analyses based on the estimated prey biomass of the existing BRWRA suggest that it, alone, could support 213-468 wolves.
- The New Mexico and Arizona Game and Fish Departments have a financial conflict of interest between managing for wolf success and placating permittees so that hunters can access their property.
- The Gila area has become one of the premier elk hunting destinations in the country, especially with the decimation of northern elk herds with the introduction of the Canadian gray wolf.
- New Mexico outfitters report that about 75 percent of their annual income comes from elk hunts.
- If wolves decimate Gila elk herds, the area will lose its attraction to hunters.
- The initial release sites in 1998 in Turkey Creek and Rousensock Creek demonstrated clearly the consequences of releasing wolves in areas with inadequate prey base and without adequate and reliable prey base information.
- an estimated 55 wolves out of the 100 projected in the FEIS, there has been no discernable impact on big game hunting; rather than being deterred, hunting activity increased in the BRWRA during the review period, and there was no lost income or adverse regional economic impact.
- Particularly important due to the advent of sarcocystosis in elk in wolf occupied regions between Reserve NM and Winston NM.

## HABITAT AND OTHER ENVIRONMENTAL IMPACTS

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Writers discussed the importance of having top predators in the ecosystem.

- Mexican gray wolves are an essential top predator in our ecosystem.
- I believe wild animals are part of our Earth's great ecosystems... For me, this balance is worth maintaining and fighting for. The Mexican grey wolf is part of this delicate ecosystem.
- Expand wolf reintroduction to the North Rim of Grand Canyon.
- The big picture is the survival of the planet & ecosystem. The wolves are part of that big picture.
- In Yellowstone National Park, where wolves have been introduced, a resurgence of diverse plant and animal life has been observed. Wolves prey on Elk and keep that population in check. Elk eat young willows and cottonwood which if left to grow to maturity are home to birds. Beaver have returned due to these trees.
- An effective Mexican wolf presence would likely improve and increase the biological diversity of its habitat.
- Wolves keep the ungulates moving and prevent degradation of the grasslands.
- Other elements in the ecosystem will also benefit (from reintroduction of wolves). More riparian areas will evolve, as the elk will tend to stay away from the higher grasses along the riverbeds. This will allow the cottonwoods and other streamside vegetation grow, as the elk and deer won't be eating the grasses and saplings. They will learn to fear predators hiding in the tall grass.

## MISCELLANEOUS

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Many people had varying comments about the program in general.

- By saving the wolf, we help preserve the creation God gave us.
- I would like to think that in my lifetime I might be able to hear or even see a Mexican Gray wolf in the wild and know that the years of injustice are over and they are allowed to simply exist.
- We need to protect our wilderness to keep our souls whole.
- No one would be eager for the wolf to be introduced into their office or backyard because it was identified as new habitat. Consequently, if you, the reader, do not want to have the wolf in your office or in your yard, consider this; the agricultural worker does not want to have the wolf in their office or yard either which are often times one and the same.
- My grandfather and father were both lifelong ranchers who came to the Sacramento Mountains in 1887. There were wolves here when they came to this area that were called "Lobos." The government put a \$50.00 bounty on wolves because of the severe damage they did to the livestock business. The crippling, harassing and killing of animals is well documented as well as the threat to human life. Therefore, I am against the government's managed wolf program with the proposed intention of releasing additional wolves in New Mexico or increasing the proposed area in which wolves are proposed to be released.
- The wolves being released are not true wolves and the Game and Fish Department has admitted they are hybrid animals, bred in captivity and therefore not capable either by genetics or by virtue of being raised in the wild of killing in the natural order of "wild" animals (which is to kill the sick or less able animals for food).
- In addition, we adopted Catron County Ordinance 002-93: An Ordinance Revising The Catron County Environmental Planning & Review Process & Repealing Ordinance No. 006-92, which requires cooperation and

consultation with Catron County Government and calls for mitigation of adverse impacts. This ordinance, in our view, is not being fully complied with.

- The Board of Commissioners (County of Otero, New Mexico) objects to the release of the Mexican Gray Wolf in Otero County. We enacted Ordinance 07-06 on October 18, 2007 prohibiting the import or release into the wild of this species and others into Otero County.
- This program violates a Lincoln County Ordinance already in place.
- I am sternly opposed to the planned reintroduction of wolves in New Mexico. These are not the native wolves of the past, but “zoo animals,” totally unequipped to survive in the wild of Arizona and New Mexico.
- Further regarding “scoping,” it also has become clear that the odd term “scoping” is being used obtusely as a tool to promote revisions of the original parameters of the program in a way that would cause the controls of the “experiment” to change so significantly that one would be creating a new experiment.

### **POLITICS/LEGAL/ENFORCEMENT**

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Many writers were concerned about the constitutionality of telling people where and when they can protect their property from wolves. Others were concerned about the penalties for poaching.

- Seriously prosecute wolf killers — right now it is considered a joke when a wolf is killed as the killer will generally receive only a ‘slap on the wrist.’
- At present no one is allowed to protect livestock and property on deeded land which is a travesty and unconstitutional and the investigative process is very hard on the people involved.
- Scrap the wolf program! It is endangering our communities and our local economies. It is illegal and unconstitutional and just plain wrong to do this sort of thing that has such a negative effect on our communities. It has become very obvious that this is a conspiracy to destroy rural communities.
- Establish a FWS Safe harbor program for any landowner who is willing to maintain wolves on their own land.
- USFWS needs to examine if they are violating NM animal abuse laws as it relates to their treatment of wolves — taking zoo or pen raised wolves and releasing them to the wild.
- Prosecution for illegal killing of wolves should be mandatory.
- The USFWS program has been politically hijacked — not about wolves but about cattle.
- There is a problematic issue of the Service’s repeated reluctance to enforce the ESA by educating local governments that they lack legal authority to pass local ordinances that purport to supersede or control the provisions of federal and state law.
- Any amended rule should require the Service to report — without divulging grand jury or on-going law enforcement investigative information — upon request of any congressman or senator information about problem permittees, numbers and types of incidents and cost to the Service of any investigation and response to that incident.
- Adding an effective enforcement provision to the new plan seems to me to be absolutely necessary for the program to work. One or two more rangers at minimum should be a priority.
- The FWS should provide better incentives for concerned citizen to cooperate with law enforcement agencies and better publicize those incentives.

## POPULATION MANAGEMENT

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Writers shared many comments about the recapture and relocation of wolves leaving the BRWRA. Others talked about genetic diversity and other issues associated with managing the population.

- Also please consider letting people trained how to handle the mix wolf-dog puppies when they are found, instead of killing them right away.
- Recapture, relocation, and removal of wolves disrupts packs and the important social structure that they have developed, skewing the pack demography towards younger animals that are more likely to take livestock.
- The alternative must comply with the conservation mandate of the Endangered Species Act and not allow regulated killing to keep the population from rapid growth and genetic rescue.
- Many of the translocated wolves were problematic elsewhere or members of packs involved in killings, frequenting homes, etc. and were removed from Arizona and then re-released into New Mexico.
- Even in circumstances in which wolves are not killed directly as a result of removal due to establishing territories outside of permitted areas, translocation of such wolves may precipitate events which result in their deaths or further removal from the wild.
- It is not the conflict itself that is the problem, but rather it is the management and policy responses by the USFWS — and the lack thereof from the Forest Service — that have resulted in unsustainable levels of lethal control and permanent removals of Mexican wolves.
- Translocated wolves had lower annual survival (0.60) than other radio-collared wolves (0.73), with government removal the primary source of mortality.
- The Mexican Grey Wolf, also known as the Mexican Lobo, used in the USFWS species recovery and introduction program is believed to be genetically impure, and as a domestically produced crossbreed, will taint and irreversibly alter the genetically pure breed that otherwise exists in the proposed subject area.
- All pups should be caught and tagged, in addition to being fitted with a shock collar, upon their first noticed emergence from their birth dens.
- Could be that the inbred, captive population of wolves is simply not genetically stable enough to survive in the wild.
- Revisions to the plan should include a cessation to killing of the current wolves, expansion of the wild population to new habitat, and a large increase in the minimum population under the plan.
- Capturing & relocating the wolves thwarts expansion of population, and can/does cause serious injury.
- Known livestock killers should never be re-released. We experienced one pair establishing territory on our ranch. They started surplus killing — eating only the udders etc. The pair killed 5 in a 24-hour period which was considered one incident. They confirmed 13 kills. One head of livestock should = one strike.
- The Durango pack has been subject to an unofficial but highly effective extermination effort. Many reintroduced wolves are subject to illegal destruction.
- The number of wolves in the Wild needs to reach a minimum of 100 wolves with 18 breeding pairs. There should be no maximums.
- Help the genetic pool by releasing wolves currently in captivity — let's keep our wolf packs healthy.
- There should be no upper limit on the number of wild wolves. 100 wolves is a minimum objective (which has not been achieved), and larger numbers will increase the long-term viability of the Mexican Gray Wolf.

- Tribal laws should be followed involving free running dogs. These dogs will compromise the wolf reintroduction since they will interbreed. Tribal land dogs should not be allowed in order to protect citizens & to protect the wolf packs.
- We believe that many (pups in the wild) have survived and a better accounting of these wolves needs to be addressed.
- ...plan for genetic exchange with a secondary recovery area (Kaibab).
- Expand the wolf holding facilities at Sevilleta National Wildlife Refuge to meet expanding needs.
- A problem of the Wolf Recovery Program is over-management. Numerous wolf pups have died due to stress of recapture or following the recapture of their parents.
- It is of utmost importance that the Service consider Mexican wolf genetics ... The first and more obvious point is to consider the genetic importance or value of individual wolves when making management decisions. Wolves with moderate to high genetic value have been lethally controlled with complete disregard of the resulting effects on recovery of the species.
- The recovery program is operating on the premise that the captive population can serve as a safeguard to prevent extinction of the subspecies and therefore could be tapped to bolster a failing wild population. Recently published research (Frankham 2007) on the genetic fitness of captive populations points to a possible reversal of that supposition because the genetic value of the captive population decreases as more generations are bred in captivity.
- The definition of breeding pair should be tightened to specify that the specific pair have actually mated and produced pups.
- Wolf Genetic diversity should be highlighted and maximized.
- The Services' management flexibility should be increased to permit direct releases — this is one of the most logical and biologically sound changes that can improve the programs' chances for success.
- Reduce the numbers of wolves killed or relocated due to livestock depredation — should only be killed when posing an immediate threat to human life.
- Define success as a self-sustaining population.
- Public needs a description of how FWS determine number of wolves within the MWEPA — collared wolves or all wolves?
- Translocations or releases of known problem wolves should not be allowed.
- If genetics is a reason for translocation, then all genetic information available should be included in the upcoming EIS.

## **PROGRAM ADMINISTRATION/SUGGESTIONS**

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Many people had suggestions about how to make the program work smoothly, or gave criticism about the direction the program has taken so far.

- I would suggest thinning the bureaucracy and allowing problems to be dealt with simply, according to a pre-set formula, by employees of different agencies.
- There needs to be explicit understanding in the rule that wolves should be expected to occupy private land as is the case with any other wildlife species.

- There is also lack of response to monitor wolf activity. These wolf agencies do not keep the San Carlos Apache aware of wolf movements, locations, predation, and updates about “problem” wolves, wolves that are habituated and could be a danger to our children. San Carlos Apaches expect early, real time notice of wolves that are close to the reservation boundaries. A “buffer zone” of several miles would help the Tribe.
- Defenders sees six very basic reasons that the reintroduction program is stalled or in retreat. These are (1) the requirement that wolves stay within the boundaries of the Blue Range Wolf Recovery Area (BRWRA); (2) the prohibition on “naïve” releases in New Mexico; (3) poaching; (4) failure to consider genetic issues; (5) the US Forest Service’s willful disregard of its obligations to protect endangered species; and (6) excessive removal of wolves from the wild.
- The US Fish and Wildlife Service should be required to hire sufficient manpower to track ALL wolf movements 24/7 and post guards 24/7 every mile or so surrounding the known pack ranges and be required to notify anyone entering a known wolf range that their pets and lives are at risk and that they should remain armed and alert at all times.
- I feel that the Recovery Plan, as it has been implemented for the past many years, has been badly skewed in favor of ranching and other special-interest groups who have an agenda of permanent removal of wolves from the ecosystem.
- Analyze and pursue the alternative of discontinuing the program, including the costs and benefits of the program thus far.
- These events and the possibility of other sabotage by ranchers clearly show the extreme importance of ending the ill-advised “three strikes rule” and making sure that the new rule and the proposed interdiction fund reward ranchers for the presence of live wolves and for responsible livestock husbandry.
- There is certainly no reason now to analyze alternatives that would increase take of wolves, set limits on wolf numbers, restrict their movements, or in any other way harm the potential of establishing additional Mexican wolf populations, one of which is already called for in the 1982 Mexican Wolf Recovery Plan and more of which may well be required in future plan revisions.
- The Gila National Forest’s recent proposal to increase the allotted AUMs on the T Bar Allotment (a depredation hotspot) by 148% is wrongheaded policy.
- Enlist the assistance of the El Mappais Group, ranchers in southwestern NM who recognize the validity of ecological principles in their operations. We need to use personal relationships among the ranching community — seems more effective.
- The Service providing telemetry equipment and/or frequencies to anyone but the IFT endangers wolves, should be eliminated, and is another example of why the Mexican wolf should be reclassified as fully endangered.
- Require AZ and NM to have approved state wolf management plans before the existing reintroduction project is expanded.
- The CWGA believes that federal wolf recovery programs should not expand; and should make a concerted effort to rectify the problems and pay for both the direct and indirect expenses caused by the federal recovery programs.
- The AMOC should limit its involvement to the current reintroduction project, and it is not the appropriate administrative body to issue prohibitions on releases outside the BRWRA or an expanded BRWRZ.
- However, we cannot agree to an expansion of the geographic scope of the BRWRA without a concomitant increase in the numerical objective, which as stated above is outside the purview of the AMOC.



- Permanent funding should be made directly available to USDA-APHIS-Wildlife Services; individuals that are impacted by the presence of wolves; and to state wildlife management agencies.
- FWS Should Earmark Project Funds for Voluntary Grazing Permit Buyout.
- It is unclear whether the AMOC recommendation that agencies and cooperators request FY 2007 funding by the end of April 2006 has been/can be met, but in any case it seems odd that such funding requests would include “landowner incentives” when there have been no specific proposals presented and the AMOC report on such incentives (see recommendation 12, above) is not even due until June 30, 2006.
- One technique which has long been suggested to FWS and has never been implemented is the use of trained volunteers to augment the IFT in a variety of ways ranging from protecting den sites to providing additional data points of locations to assisting with public education and outreach.
- The wildly disparate treatment of anti-reintroduction special interests, who had private meetings with top FWS officials, and eight pro-reintroduction organizations, who did not even receive an acknowledgement, strongly suggests that under Director Hall FWS abandoned any objective role in fulfilling its statutory and regulatory responsibility for Mexican Wolf reintroduction — and recovery.
- The purpose of involving other government entities (Catron County) is to reduce duplication of effort and gain “local” expertise for a more comprehensive assessment and full disclosure of environmental affects.
- According to the courts, an agency must consider alternatives, even if they are not within the agency’s jurisdiction or are not authorized by enabling legislation.
- At the outset, we first wish to point out to you that NEPA requires your consideration of *all* reasonable alternatives to this proposed action — including the analysis of termination of this program as an alternative to its expansion.
- Analyze information that has been issued as public education during scoping meetings including the power point presentation as well as the contents of posters that contain faulty or out of date information relating but not limited to wolf removals, livestock depredation and food sources for wolves and impacts to the human element.
- As such, the new listing rule should entail the prioritized management of public lands within the recovery area for the recovery of the Mexican gray wolf. [2] “Multiple uses,” including livestock grazing, should only be allowed insofar as they do not conflict with habitat management for wolf recovery or the restoration of ecological systems, including the predator/prey balance.
- Therefore, the Technical Component’s recommendation should be limited to the scientifically supportable “wolves with wild experience [should] continue to be translocated after their first removal event.” Whether there are overriding — or politically overwhelming — limitations on that recommendation should be left to those who approve policies and SOPs.
- This letter — which was in response to two private, invitation-only meetings high ranking FWS officials held with wolf reintroduction opponents in February 2005 and which preceded a moratorium on wolf releases and a more stringent removal and kill policy — placed FWS on notice that on-the-record public comment was necessary because of the “tremendous public concern” over FWS and AMOC policy shifts “[c]ontrary to the advice of independent biologists who have urged that fewer wolves be removed from the wild and more released.
- Requiring a consensus of members of the SWDPS Recovery Team, of which I am a stakeholder member, to achieve a consensus in favor of rule change before beginning the rule change process is totally unrealistic, given that several stakeholder members of the team represent groups that have twice sued the Service in an attempt to end the program and remove all wolves from the wild.

- We did appreciate the team loaning telemetry units to us, because it did influence some of our decisions whether we took the dogs to help gather cattle or moving cattle out of an area where the wolves were.

### PROGRAM COSTS

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A few letters discussed the cost of the reintroduction program.

- Since its inception, the Mexican gray wolf reentry program has spent more than \$14 million on the release of just 59 wolves — at a cost of over \$237,000 per wolf.
- No expansion should be considered or implemented without full consultation and cooperation of the local jurisdictions concerned, including proper training and full contingent funding for the health and safety authorities, who would necessarily become involved.
- Develop a program to commit funds to municipalities (the towns/counties or both) based on how many wolves or wolf pairs are living in that region.
- I do not agree with the release and encouragement of the wolf in the inhabited U.S. The experiment has cost the U.S. taxpayer enough.
- While the mortality rate for reintroduced wolves is not as high as that predicted in the EIS, the fact that during the first seven years of the program, at least 22 wolves died from illegal gunshots (and nine from vehicular collisions, some of which were probably not accidental), and only one of those crimes has been successfully prosecuted, suggests that law enforcement efforts should receive more emphasis and additional funding.
- If a private fund is established for an incentive program, it must have appropriate oversight and documentation requirements.
- The fact that they are not being fully funded to participate in the wolf program is causing hardship in other counties that are not in wolf country due to the fact that WS is pulling resources and staff to deal with wolf depredations when needed.
- Therefore, we support the inclusion of funds in the reintroduction program to buy out voluntarily relinquished grazing permits within the recovery area.
- On top of this, the taxpayer is paying the price for these efforts, and I can not see supporting the expenditures unless these Mexican Wolves are going to come under some effective protective efforts and vigorous prosecution for the offenders.

### RANCHING

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Ranching methods on and off public lands were discussed in many of the comments. Many people on both sides had suggestions about how to improve husbandry practices, ranching locations, and removal of carcasses. Many ranchers wrote that adding more rules — or more wolves — would unduly burden their businesses, while other writers expressed concerns about any grazing on public lands.

- Have ranchers use alpacas and llamas to provide more diversity in the herd, to help protect the “precious cows.”
- Needs to be a provision of exempting wolves that have fed on any carcass of livestock that died of a non-wolf cause from being killed or removed.
- Just as the release wolves are conditioned to avoid humans, create a program that will condition the animals to also avoid cattle or sheep.

- The Reintroduction Program cannot, without the support of the USDA Forest Service, force livestock operators to better manage their livestock.
- If the landscape unique to that allotment definitively tilts the balance against cattle, sheep or goats, the Forest Service, and/or BLM should retire that allotment and provide the affected rancher with as convenient as possible alternative grazing lease.
- moving cattle away from den sites, using extra herders, fencing and fladry, lowering stocking rates during particular times of the year or in particular areas, removal of attractants such as carcasses, community calving programs, etc.
- They already have a CFR pertaining to removal of private property (this includes such things as abandoned cars, trash, and yes, even livestock) from USFS administered lands. Another avenue, and this is not impossible, is to write “carcass removal” into the permittee’s Annual Operating Instructions (AOI).
- Also — important to have any calving or lambing done on private ranches — not on wild lands in wolf-reintroduction areas.
- There is no justification for permitting private individuals to injure wolves on public lands.
- Retire grazing permits at opportune times (permanently), especially in critical areas.
- Public land ranchers are making money grazing their animals at below market subsidies on our public lands.
- Buy ranchers out who want to retire or move to wolfless areas.
- Offer incentives to ranchers to help minimize predation — cash for proper guard dogs, calving pens, adequate fencing, etc. — and also increase the compensation amount for livestock taken.
- Keep looking for innovative ways to deal with wolf-livestock conflicts — More oversight by ranchers — a warning system to allow ranchers to be notified when wolves are in the occupied pastures. Is fladry working — is there an easy and economical way to make fladry.
- I have friends who have cattle over near Blythe/Parker. They use Great Pyrenees dogs as guard dogs. Wolves cannot bite through their thick fur and are quite large & strong. They have had no losses do to coyotes or lions.
- Most of our grasslands and their inherent capacity to support wildlife are in poor shape due to grazing and fire suppression. Sixty percent of the endangered species on our public lands are due in part to grazing. The cost in dollars from revenue loss from such activities as, recreation, watchable wildlife, hunting and fishing are enormous.
- Ranchers should be required to practice responsible husbandry, including disposal of livestock carcasses, penned calving areas and predator hazing tactics.
- There is a program that Game and Fish is using apparently with success, as I was told by Bill Van Pelt at the Phoenix public meeting, and is giving hay to the ranchers so they can feed their cattle in specific areas of their ranches, so that way they can keep a close watch on their livestock.
- Eliminate open-range calving by livestock. Public lands ranchers should be required to confine pregnant cows and calves until they are of sufficient size and health to fend for themselves in the backcountry that is prime wolf habitat. Expecting wolves not to be attracted to young, weak animals is to go against their natural instinct. Ranchers should not expect to defy the laws of nature by tempting wolves with unmonitored livestock births.
- Carcass disposal is not always reasonable or possible for the following reasons. 1) Frozen ground will keep ranchers from burying carcasses possibly for months. 2) Ranches with low incomes may not own or have access

to the equipment necessary to dispose of a carcass. 3) Remoteness and ruggedness of terrain may not lend to easy location nor access to possible carcasses.

- FWS should earmark project funds for voluntary grazing permit buyouts.
- Grazing privileges should be immediately suspended in reaction to malfeasance by public land users.
- I support complete withdrawal of all grazing permits on public lands, as I believe this will eliminate perceived conflicts by those who are completely intolerant of any other interests than they own
- Public lands belong to all of us, and they (ranchers grazing on federal land) are depriving future generations of knowing & seeing the Mexican grey wolf.
- Ensure adequate recognition of the importance of responsible livestock management as a factor in wolf conservation decisions.
- This does not even address the problem of wear and tear on humans and equipment to deal with the problems of wolves invading people's lives. Many hard-earned dollars being spent on hours of checking on animals trying to keep them safe. Many hours of non-productive time on horse back, vehicles or on foot, which could be spent on positive projects.
- Further imagine the task of digging a hole deep enough to cover a 1000-lb animal in an area where topsoil may be less than a foot deep. If the U.S. Fish & Wildlife Service believes carcass removal would benefit the Wolf Recovery Program then they should provide the labor and financial resources for carcass removal not the livestock operator.
- Catron County ranchers receive \$2.66 million in subsidies between 1995–2005; furthermore they receive discounted grazing fees of more than 80% on public lands.
- If ranchers feel uncomfortable receiving compensation money from “environmentalist” organizations, the money needs to come from a source that is not labeled “environmentalist. I will push for a pool of \$ from many sources but if it can have a return address that ranchers are more likely to accept, this a step towards appeasement on both “sides.”
- As I understand it, if a calf, etc. is killed by a wolf or other predator there is a tedious process to get compensated for the loss. Can you eliminate that process, provide a monthly or annual payout to ranchers and have them become part of the protection — protect the wolves and protect their compensation and prevent the problems at the end.
- Removal of cattle, contributing to heavy grass load (high fire danger) and brushed up, inaccessible rivers for the general public, as well as loss of income which has turned area ranches into subdivisions for the wealthy (high water use, septic tanks, domestic animals attacking wildlife, no maintenance of stock tanks and salt that wildlife also use) \* a lack of game management to restore the wilderness deer and elk herds that have been devastated by drought, and in the case of deer, over-the-counter deer licenses.
- Protect livestock by corralling them or guarding them more effectively. Livestock growers in the arid southwest need to realize that their leases are not rights.
- The extra cost burden on livestock operators for proscribed proactive predator management should be recognized, including the stress and anxiety that may sometimes take a personal toll Another area of potential loss that needs to be considered is loss of property and ranch business values in areas where wolf predation has (or is perceived to have) negatively impacted livestock production and thus ranch real estate and associated grazing permit (where applicable) value.

- The rule in the southwest should match the reintroduction rule for the northern Rocky Mountains- ranchers are required to remove attractants.
- Provide not only the financial incentives, but REQUIRE cattle ranch operators in the recovery area to return to active herded grazing, thus creating jobs, improving grasslands and protecting their herds.
- Care must be taken that losses not exceed certain sustainable thresholds so that livestock operators are not discouraged (through suffering unsustainable losses in the face of ineffective prevention measures) from investing in herd improvement and best management practices (such as costly health programs).
- Perhaps “denning pastures” could be leased from livestock operators; similarly certain pastures could be designated as “calving pastures” with extensive protective measures in place.
- Having lived rurally for most of my time in Arizona, often adjacent to federal lands leased to ranchers, I know that factually, predation is the least likely case of decimation of livestock.
- Rendering the carcass inedible or unattractive to wolves by environmentally safe chemical methods would be somewhat easier to implement and may be more effective in conditioning wolves to avoid cattle.
- Timely detection would be difficult and removal problematic especially with the USFS road closure program.
- Aid should be available to ranchers to remove carcasses of livestock that die of natural causes to lessen the attraction to wolves.
- Still, it certainly wouldn’t hurt to for the FWS to work with the Forest Service to develop a system of livestock carcass removal on public lands-whether it’s the responsibility of the ranchers or not.
- Evidence supports that wolves that have scavenged on livestock carcasses show a tendency to prey on livestock leading to the sometimes lethal removal of wolves from the wild.
- The failure of the USFS to address the BRWRA Mexican wolf population in its planning process combined with the USFWS aggressive removal of wolves in conflict with cattle regardless of circumstance has created an untenable management situation.
- In addition I think it is completely inhumane to authorize the removal of a female wolf with pups as happened this year.
- The FWS has permanently removed approximately 25% of the known wild population of Mexican wolves this year alone, and according to the five year review (undertaken when removal rates were lower than today), one Mexican wolf was killed or otherwise permanently removed for every 1.1 cattle depredations (the comparable ratio in the Northern Rockies is 3.8 depredations per wolf removed).
- Stop renewing grazing leases but compensate and manage depredation losses ranchers outside public trust lands suffer due to these returned animals.
- The only realistic way to accomplish the return of the wolf is create a secure core area in the US Southwest (this requires removal of livestock).
- I oppose a change in the present approach now being touted by misinformed arm-chair liberals who claim that cattle-killing wolves should not be removed from areas where it is proven they have killed cattle.
- Our public lands are for all people to enjoy and use, so if there are concerns from renters of grazing allotments about the wolf reintroduction program, they must realize that they are just one group among many who wish to use the public lands.

- Livestock that is properly rotated across grazing land, whether leased from the government or privately owned, is stock that is being properly watched over and land that is being properly conserved.
- Requiring ranchers to immediately remove dead livestock is the antithesis to normal grazing practice (as well as a detriment to other species which utilize carcasses as a food source such as foxes, coyotes, various raptors, ravens etc.).
- Reducing the depredation clock (three depredations in 365 days and the wolf is removed per SOP 13) to a two-month period should be considered.
- Fish and Wildlife Service should work closely with the United States Department of Agriculture Forest Service for limitations on the leases provided to private enterprise for the grazing of livestock.
- In any future rulemaking and management planning a provision to recognize the private water rights and rights of ways on federally administered grazing allotments should be integrated with wolf management just as private lands provisions are recognized.
- Buy out grazing leases in the Gila Wilderness and Apache-Sitgreave National Forest.
- At the very least, livestock operators on public land should be exclusively responsible for proper disposal of their livestock carcasses, and the terms “nuisance wolves” and “problem wolves” should be redefined so as to exclude wolves that scavenge on the carcasses of livestock that died of non-wolf [causes].
- Another partial solution to decrease the number of complaints might be to avoid devoting some government-owned land to ranching by leaseholders when the leases are for less than market value.
- Possible actions to address the problem of wolf-livestock conflicts might include, but not be limited to providing financial incentives for livestock management practices that minimize conflict, providing substantial payment to any permittee whose allotment or deeded land supports a successful wolf den in a given year, and even possibly voluntarily retiring certain grazing allotments with appropriate compensation.
- FWS should consider adapting and adopting the more imaginative programs found in other countries which emphasize rewarding results — providing incentives for private land owners and allotment grantees where wolves are successful.
- Operators who do not use non-lethal “harassing” solutions such as livestock protecting dogs or who persist in feeding livestock when calving in known wolf areas should have their grazing rights restricted or removed.
- Recommending “removal of carcasses,” “weekly riding,” and “single pasture calving,” are merely thinly veiled attacks on public lands ranching.
- The action required of state livestock inspectors under that section - that the inspector “shall seize and take possession of same” — would accomplish precisely the carcass removal essential to reducing wolf-livestock conflicts!
- If New Mexico livestock inspectors had the means and resources to enter Public Lands and seize and take away carcasses, the goal of carcass removal would be achieved.
- Remove from consideration suggestions to remove carcasses and implementing “single pasture calving.” It is highly unlikely that implementing either of these suggestions will produce a positive result for the wolf, but they most assuredly create additional hardship for the rancher.
- The final report contains the unsubstantiated assertions that federal agencies are powerless to require permittees — granted the privilege of using public lands — to remove, render unpalatable, or bury dead livestock to prevent attracting wolves.

- “Wolf free” zones to protect livestock operators should not be allowed.
- As a hunter and conservationist, I have seen first hand the destruction upon our public lands caused by cattle.
- I will support the introduction of Mexican Wolves when the following criteria is met. Land is available to raise cattle in humane conditions, chemicals and growth hormones won't be necessary to bring them to market, the cost of beef will remain in reach of the average family, the introduction of wildlife doesn't take precedent over ranching necessary in the production of beef cattle. Your statement that wolves preferred prey is wildlife is not true, their preferred prey now is cattle which are much weaker and therefore easier to catch than elk or deer.

## RECOVERY PLAN AND 10(j) RULE

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Writers talked about the age of the current recovery plan, gave suggestions for updating it, and weighed in on specific issues involved in the plan.

- First, the Mexican Wolf Recovery Plan does not contain “objective, measurable criteria which, when met, would result in a determination ... that the species be removed from the list.” 16 U.S.C.
- I would urge that the recovery team be reassembled ... in my opinion, politics has been driving decisions regarding the wolves in the field more than science has. It is time for the federal government to again take the lead in the program.
- I am begging you to reassemble the Mexican wolves recovery team and place a moratorium on the implementation of SOP 13 until the scientists' recommendations are incorporated into an updated wolf recovery plan.
- The current recovery plan is out of date — from 1982.
- Current recovery plan is 25 years old and therefore does not incorporate recent data and advances in conservation methods.
- The FWS needs to revise the recovery plan before or concurrent with this rule change so that rule changes do not preclude future recovery actions.
- At the outset, we (the Arizona Cattle Growers' Association) first wish to point out to you that NEPA requires your consideration of all reasonable alternatives to this proposed action — including the analysis of termination of this program as an alternative to its expansion.
- FWS should implement applied research that investigates and documents the consequences of SOP13. Peer scientific review need to be conducted and made public.
- FWS need to establish and maintain an adaptive management monitoring program to collect data and determine impacts.
- Objectives of harassment management should be stated.
- FWS should consider adding every encounter and take to a database that can be used for adaptive management purposes.
- The biggest hurdle to reintroduction has been the lack of firm recovery goals — firm numbers need to be established.
- Do not change 10j rules until the recovery objectives are set. Recommendation for 100 total wolves for AZ and NM combined.
- Don't change 10j rule until a working interdiction and depredation payment program is in place and functioning.

- Needs to be a provision on the Forest Service to execute its ESA §7(a)(1) duties for the Mexican gray wolf by adopting and implementing conservation programs or policies that serve to better avoid wolf-livestock conflicts, and thus promote the conservation and recovery of the BRWRA population.
- FWS should be required to complete recovery planning for the Mexican gray wolf as expeditiously as possible if such a plan has not been approved and implemented prior to promulgation of a revised “experimental, essential” population rule or reclassification of the BRWRA population as endangered with full ESA protection.
- A new rule should include a provision that would allow future recovery objectives to override any provisions in a revised rule authorizing the take of Mexican wolves (other than for immediate defense of humans) both within and outside the BRWRA, but within the experimental population area.
- The Apache-Gila wolf population is obviously essential to recovery and should be so designated.
- Without first identifying objective, measurable criteria of benchmarks for recovery, as well as detailed strategies for achieving those criteria and benchmarks FWS has no framework within which to create a new management scheme for the Mexican gray wolf.
- FWS under NEPA must seriously consider all reasonable and feasible alternatives for fulfilling the project purpose.
- Describe a specific wolf population objective in the rule — such an objective should be described in terms of overall numbers, breeding pairs, packs, distribution, allowable densities, duration and other meaningful biological, ecological, and demographic features. Such a description should not focus on single numbers but on reasonable ranges of values within biologically meaningful time frames that are consistent with the abilities of wildlife managers.
- Implement the recommendations given in the Paquet Report.
- An attempt to clarify “breeding pair” is an attempt to minimize the deleterious effects of abdicating its authority and mismanaging the reintroduction program.
- Include provisions in the amended rule that would limit future options for recovery.
- The Service has failed to use the management authority entrusted to it under the present rule to promote recovery; it has failed to provide a legally sufficient recovery plan before considering rule changes, which could have a significant impact on recovery.
- Place no cap on the number of wolves in the wild population. A viable, self-sustaining population of at least 100 wolves is a minimum objective for the BRWRA population of wolves. Recovery has yet to be defined through revision of the recovery plan. No maximum should be set for the number of wolves in the wild through this rule change.
- What you are trying to do is re-create the past. You cite specimens from 1916 and earlier. The habitat of 2007 is much different; the prey species is different.
- Current recovery plan is 25 years old and therefore does not incorporate recent data and advances in conservation methods.
- I would urge that the recovery team be reassembled... in my opinion, politics has been driving decisions regarding the wolves in the field more than science has. It is time for the federal government to again take the lead in the program.
- Defenders sees six very basic reasons that the reintroduction program is stalled or in retreat. These are (1) the requirement that wolves stay within the boundaries of the Blue Range Wolf Recovery Area (BRWRA); (2) the



prohibition on “naïve” releases in New Mexico; (3) poaching; (4) failure to consider genetic issues; (5) the US Forest Service’s willful disregard of its obligations to protect endangered species; and (6) excessive removal of wolves from the wild.

- In my opinion this is one more step intended to destroy the cattle industry, just as the environmental extremists have successfully destroyed the lumber industry in Arizona and are seeking to shut down mining and cattle ranching also.
- Objectives of harassment management should be stated.
- A primary overriding goal of achieving the current, but partial, recovery objective of establishing a viable, self-sustaining population of at least 100 Mexican gray wolves within the current geographic scope of the BRWRA with no upper limit on the future number of Mexican wolves within the BRWRA or any larger geographic area.

## RESEARCH

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Some writers suggested completing further research about different areas of the wolf reintroduction program.

- FWS should implement applied research that investigates and document the consequences of SOP13. Peer scientific review need to be conducted and made public.
- Research needs to be done on wolves by land grant universities that are unbiased and have the resources to do so.
- FWS need to establish and maintain an adaptive management monitoring program to collect data and determine impacts.
- More intensive and widespread data should be collected on wolf diet using scat studies from throughout the recovery area rather than one point and time date that leads to an incorrect conclusion that wolves are eating 75% elk as noted on a pie chart in the scoping and educational posters. This study is out of date and far too small to legitimately make that claim. There is also reason to believe the study is biased as scat from areas where livestock were present was not used in the analysis. Any NEPA analysis should provide for better information compilation in a new rule.
- It would be helpful if Congressman Steve Pearce would sponsor a bill to fund forensics research to help ranchers show evidence of wolf predation of livestock
- It has been argued that American wolf behavior is categorically “different” from that of their Russian cousins, and that recently recorded North American instances of stalking, “prey-testing” behavior are merely displays of “curiosity.” Peer-reviewed research to verify this contention should certainly be conducted prior to any further release or program expansion to assure the public that their lives and property are not being negligently endangered.
- Credible peer-reviewed studies should be conducted on the potential for livestock depredations prior to further program expansion.
- An analysis of wolf occupancy of lands where domestic livestock are present, homes where children reside, and where domestic animals may contract a parasite or disease and spread it to humans or where wolves may directly deposit infectious material near residences needs to be conducted.
- Research is necessary to document the suitability of the White Sands Missile Range as a recovery area.

## **SOCIO-ECONOMIC IMPACTS**

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Many comments focused on the social and economic implications of expanding the release boundary area.

- There should be disclosure of the full social, cultural, and economic impacts on rural residents and local governments; recognize and mitigate impacts to pastoral communities and individuals affected by introduced wolves.
- PROVIDE A FAIR SOCIO-ECONOMIC ANALYSIS. The socio-economic analysis that will be completed as part of this new EIS should not overly emphasize the “hardships” to livestock operators.
- The socio-economic analysis that will be completed as part of this new EIS should not overly emphasize the “hardships” to livestock operators. Livestock operations on public lands are heavily subsidized by federal and state money, and the handful of ranchers who are affected by wolf depredations are already compensated fairly for their loss from a private organization.
- They could help the poor New Mexico economy — my research w/Yellowstone wolf recovery indicates wolves attract humans & dollars to wolf country — to the tune of \$300 million a year in Yellowstone country. This could boost the lousy New Mexico economy much more than trophy hunts led by failing ranchers who run their cattle on public lands.
- Develop a program to commit funds to municipalities (the towns/counties or both) based on how many wolves or wolf pairs are living in that region.
- I live on the Blue River in New Mexico. My wife and I operate a hospitality lodging business on the Blue River and we strongly support the wolf project.
- Why should the citizens here in the target zones be asked to bear the brunt of this onerous program? We are already in the highest un-employment area in New Mexico as well as one of the lowest household income areas in the entire United States. Economic opportunity or being able to make a living in this area is very, very hard. There is virtually no industry except a small service industry and the Endangered Species Mexican Spotted Owl has almost entirely ruined our logging industry.
- This policy will be ultimately beneficial to the prey population by strengthening the genetic pool and the human population by potential future hunting possibilities (wolf) and economic benefits from enhanced tourist visitation and scientific research done in the area.
- I view this animal as a potential source of tourism revenue for our state.
- Also there needs to be a study done on the social impact that the MWRP has on children in the MWEPA — psychological testimonies of local children needing protection from the wolves.
- I have recommended that the socio-economic assessment take into consideration the proven financial benefits from the influx of tourists and wildlife watchers to areas such as northern Minnesota and Yellowstone because of the presence of wolves.
- The analysis of the socioeconomic impacts of the Mexican gray wolf in any future NEPA analysis should recognize the non-market benefits of wolf reintroduction and recovery and go beyond merely looking at the local and regional benefits. The Environmental Impact Statement relating to the reintroduction of gray wolves in Yellowstone National Park and Central Idaho included an estimate non-market benefits which resulted in a net economic value of the reintroduction of between 6.6 and 9.9 million dollars each year.

- Disclose the full social, cultural and economic impacts on rural residents and local governments to include the loss of tax revenue and increase government operation costs due to presence of introduced wolves. (All the people howling for introduction of these animals are urban people and are unaffected on a daily basis.)
- Ensure the economic impact analysis addresses the total impact to all citizens of each state.
- Needs to be full disclosure of social, cultural and economic impacts on rural residents and local governments to include the loss of tax revenue and increased government operation costs due to presence of introduced wolves- needs to be specific economic analysis on ranches that are being harmed.
- Wildlife draws tourists to New Mexico, resulting in eco-tourism dollars.
- Wolves' value is hard to quantify in economic terms but they have immense value.
- This program is having a disproportionately high and adverse impact on minority's and low-income populations within the MWRA.
- Rural communities and villages continue to demonstrate the surviveability of the extended family structure within land based economies. A part of that structure is the matanza (slaughter event). The frequency and scale of various Matanzas during the year depend on numerous family and/or religious celebrations or gatherings. This cultural behavior will continue and eventually collide with the wolf program.
- In the context of global warming, peak oil supplies, runaway energy costs, skyrocketing populations, diminished aquifers, and uncertain agricultural production outlooks, our national food supply may come to demand more production of animal protein from native rangelands than ever before ... this may necessarily take precedence over other resource management considerations such as providing habitat for non-essential experimental populations of species...
- For example, Catron County livestock producers have lost cattle, horse, etc. valued at \$500,000.
- Due to the social costs of the program, it is imperative that the Environmental Impact Statement be conducted at a scale and rigor that provides full disclosure to the public about the rate and magnitude of social, economic, cultural and distributional impacts.
- Based on what I saw in Alaska and in Yellowstone it seems that it would be possible to increase eco-tourism to boost the local economy in that part of New Mexico.
- The socio-economic analysis should attempt to quantify the priceless experience of hearing a wolf howl in the wild and the value of reintroduction and recovery on the ecosystem to the broader American public.
- In other words, every dollar of livestock revenue generates 3.5 dollars of other revenues in the economy, such as revenues for equipment companies, plumbing suppliers, trailer sales, feed sales, etc.
- The economic future of this area is in sustainable tourism and in preserving the area for the enjoyment of those people who are moving here precisely because the area is wild enough to support a viable population of Mexican Gray Wolves.
- The potential loss of revenue will severely damage outfitters and Gila-area communities.
- Any animal routinely contributing to the ability of a small businessman to earn a livelihood including but not limited to cattle, horses, goats, burros, llamas, chickens, stock dogs, guard dogs, hunting dogs and other domestic animal to which value is attached and the loss of which would prove to be a financial hardship and result in the takings of private property (pursuant to the Fifth Amendment of the U.S.

- Yet the Socioeconomic Component devotes 25 pages to impacts (presumably mostly negative) on hunting, and only approximately 10 pages to the combined beneficial impacts of wolf reintroduction on regional tourism, lodging expenditures, expenditures in the National Forests, and the like.
- Disclosure of the full social, cultural and economic impacts on rural residents and local governments to include the loss of tax revenue and increased government operation costs due to presence of introduced wolves.
- The FWS should undertake appropriate social survey if it expects the socio-economic analysis to be fair and unbiased, and scoping meetings and materials should also strive to limit the emotional pandering to special interest groups.

### TAKE

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The notion of “take”—the non-lethal or lethal harassment of a wolf—was a very popular topic among letter writers. Some said that take opportunities should be made narrower; others wanted to broaden them. Some people discussed different types of potential non-lethal methods of take.

- I want every wolf to be protected from poachers. Please END SOP 13 and raise and publicize a bounty. Raise involvement of the FBI in investigating and catching poachers.
- The public should have the right to taser wolves or harass them by any other non-lethal means, on public, private and State School Trust lands if the wolves are threatening or stalking pets, humans or livestock.
- We recommend that people be encouraged to carry bear spray when in wolf country, and that they be permitted to use it to harass an approaching wolf or to defend a pet.
- Wolves should only be killed when posing an immediate threat to human life, which is an extremely rare occurrence. [3] Under no circumstances should wolves be killed or removed for attacking pets, which should be kept under control by their owners.
- The threshold for permanent removal should be reduced and modified so that any wolf that has eaten any part of one domestic livestock animal or pet must be euthanized or relocated to National Park Service land (coincidentally where livestock are banned) and at least 25 miles away from the depredation crime scene.
- I urge you to revise SOP 13 so that only wolves who exhibit repeated, confirmed depredatory behavior are removed from the population, and to require that ranchers take all reasonable precautions to protect their livestock - and to tolerate a limited number of cattle losses to the wolf population.
- In the documentation provided me, there is a section that states, “the proposed rule provision that restricted public land grazing allottees from waiting for wolves in order to harass them has been deleted.” I am not a lawyer, but in reading this statement, it appears that it says, in essence, that it is okay for someone using public land for grazing his/her animals to wait for and knowingly harass a wolf(ves).
- Based on the USFSW request for exploration of all possible alternatives and remedies to deter problem wolves, we support non-lethal and non-injurious harassment of Mexican wolves engaged in nuisance behavior or attacking livestock or pets, but do not support any permission to kill wolves that are not posing an immediate physical threat to an individual or livestock at this time.
- It is a fundamental American right to be able to defend one’s property, which includes one’s pets from danger.
- If you remove a needed member of a pack, the pack may be detrimentally affected, and this reduces the sustainability of that pack.

- An overly broad definition of “problem wolves” unreasonable stigmatizes pups and yearlings and sets the stage for undesirable levels of removal.
- Use high tech surveillance equipment that exists, consider requiring such equipment to alarm or scare away wolves from cattle enclaves.
- Nobody should be allowed to shoot wolves.
- There should be very limited “take” of wolves as this hinders the reintroduction process.
- I’d allow those dealing with habituated wolves, rubber buckshot on a permit basis and with instruction, the idea being a non-lethal aversion technique that will remove most of the fear element from the debate.
- I also think that the definition of “harassment” be further defined, in order to give a clearer definition as to what behavior people can engage in with the wolves.
- 10-years’ freedom in the Gila Wilderness area or one like to it, with a “no bait law” in effect to prevent luring the wolves outside the wilderness are(s).
- The practice of utilizing helicopters and planes to dispense with depredating wolves must not be eliminated.
- However, allowing more serious harassment actions, or take by the public without simultaneously increasing wolf release number and decreasing removal frequency will likely impede wolf recovery and anger may people.
- Lethal control decisions must also be made based upon wolf population structure: wolves are social animals and the viability of their populations (s) depends not just on the number of wolves. One therefore cannot treat all wolves as equal. If those killed are alpha males or disproportionally of one sex or age cohort, etc. the agency must first consider what removal will do to wolf viability, behavior and recovery.
- A reward should be offered to help control the deliberate killing of a wolf.
- In 2006, nearly 90 percent of all management removals and lethal control were in response to livestock depredation and were carried out under the terms of SOP 13. It is important to note that SOP 13 is discretionary management measure, which is allowed but not mandated by the existing rule. Any rule revisions should include the repeal of SOP 13.
- I feel that the three strikes rule is too inflexible. This should be changed to add a little flexibility that even if a wolf has attacked livestock three times, the events leading up to the attacks shall be studied and evaluated on a case-by-case basis to ascertain that maybe extenuating circumstances of some kind do not support having a wolf killed or removed into captivity.
- The Service should incorporate in the amended rule that any illegal take will be investigated and prosecuted, and that additional releases of wolves will occur to replace and increase the effective population in the wild.
- Any revised rule should state that unless necessary to prevent imminent danger to human life, wolves will not be taken for any acts for which the complaining party 1) refused to cooperate with the Service or any other governmental or non-governmental agency that offered proactive, preventative measure or 2) refused to apply for compensation — at market value and from any available source — for confirmed depredations.
- Local county law enforcement personnel should be allowed to lethally take a wolf for immediate protection of human safety.
- Once that conditioning is lost, the wolves no longer fear humans so all the “harassment” that is allowed would have little effect on the behavior of wolves.
- Rubber bullets paint balls are of no use if the wolf or wolves are not conditioned to avoid human habitation.

- In light of the AMOC's continued application of SOP 13.0, with lethal controls and permanent removals, and disruptive translocations not even required under the present Rule — and directly contributing to the shortfall in projected population and breeding pairs — the public can have no confidence in the results of Recommendation 10.
- There is also no known way to turn “bad wolves” into “good wolves.” Another alternative would be to use these animals to research rabies vaccination programs that are much needed within the program.
- Ranchers should have **NO** harassment privileges on public lands over what any other member of the public has; Special privileges to ranchers is the root of much of the wolf reintroduction problems, i.e., special considerations and catering to public land ranchers has fostered a belief, on their part, that their desires trump that of every other member of the American public.
- Provisions for increased injurious or lethal take would further depress wolf numbers, make it difficult for law enforcement to distinguish between legal and illegal take (which may only be identified through the unknowable intentions of a person that takes a wolf), and create significant additional hurdles for successful prosecution of illegal take.

## **WOLF BEHAVIOR & HUMAN INTERACTIONS**

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Several comments were received regarding wolf behavior, and the safety of humans around wolves. People had concerns about “habituation” of wolves, as well as the safety of children. Other people cited statistics saying there's no documented case in North America of a human killed by a wolf.

- The continued feeding of wolves by FWS and Game & Fish personnel should not be allowed to persist.
- Many of these wolves may be partially habituated to humans and through captivity come to associate humans with safe food sources. Re-conditioning wolves to avoid humans and their domesticated animals will benefit both the wolves and the ranchers.
- Efforts to reduce wolf habituation to humans and cattle should be strenuously enforced.
- Based on my interviews with rural livestock producers in the wolf recovery area, government agency personnel (ex- and current) and wolf conservationists, I fully support empowering local people (non-agency personnel) to engage in less-than-lethal hazing of wolves when and if wolves are exhibiting habituated behavior or are threatening pets or livestock on public land.
- Having spent a lot of time in the woods around, and in close proximity to, bears, wolves, cougars, badgers, coyotes and other “dangerous” animals, I can truthfully say I've never had a problem.
- The thought of raising these dangerous predators in captivity and then thinking there will be no habituation is ludicrous.
- There has been at most only one confirmed human fatality caused by a healthy wolf in North America in last century. Never has there been a human physically harmed by a Mexican wolf.
- Most of the native population (human) in the introduction areas is very much against the reintroduction for some very good reasons. Mainly because the wolves become habituated to humans and there have already been documented attacks on humans.
- It has been highly publicized that wolves do not prey on, attack, or kill humans. There have been documented accounts of human deaths from wolves. Russia and Germany have had hundreds of humans killed by wolves. Wolves became habituated in these countries and preyed on humans.

- My biggest fear is that an innocent child will be mauled and killed. What is the price of a human life?
- The continued feeding of wolves by U.S. Fish and Wildlife Service and Game and Fish personnel should not be allowed to persist. Although it may alleviate a short-term problem, it in turn only creates a longer term problem with habituation.
- Safety for me & hunters that pack into the Gila wilderness 20 miles from nearest road. What do we do when we encounter wolves?
- The people that live on ranches near the wolves are in constant danger, and their children can not even go outside and play without a bodyguard or a gun.
- I backpack the trails in New Mexico and support the wolf reintroduction process.
- It is only a matter of time before one of these wolves kills a human.
- There have also been accounts in the Gila of wolves stalking children & their pets — wolves coming into peoples yards & killing dogs — how long before it is a child.
- FWS should be concerned with safety of humans, domestic animals, and livestock.
- If the wolf is not afraid of being in your yard, it's not afraid of your children.
- USFWS needs to stop misleading public that wolves have never been documented killing anyone in North America — this is not true.
- Do not allow continued human wolf contact. Do not feed wolves. Remove wolves that hang around or follow people.
- I suggest that with the success of the captive breeding program, it would be better to sacrifice a few released wolves through broadening the permission for private landowners to take wolves, with the expectation that wolves remaining in the population will learn to avoid mankind and become as elusive as coyotes are now.
- Children have to wait for the bus in metal cages now. They are not wild animals.
- Also, I believe a clear statement about wolf behavior and the likelihood of wolves following children to and from school should be published and the wild stories denied. At the meeting I was dismayed to hear a biologist spreading the stories.
- I am a resident of Catron County and I am in favor of the S.W. Wolf Recovery program. I am sick of publicity stunts by Catron county officials such as wolf-proof shelters for school children. I have not yet seen a rural family drop off their children in a remote spot to wait for a school bus alone and unprotected. I know as I, along with other parents, did just that even before the wolf became an issue at Horse Springs.
- Protocols should be developed for “wolf tourism” to insure that such activities do not inadvertently contribute to habituation that may lead to future depredation behavior.
- This is the policy blindness that infuriates those of us who live in the area and are greatly inconvenienced by the damage wolves cause to US, our children and livestock.
- What diseases can these children catch from the wolves?
- Wolves are also watching children walking home from school and I think this is very dangerous.
- I don't believe that those of you that are working with the wolves can realize how these wolves are affecting the children.
- Fearful adults may be frightening children through their own misinformation.

- The wolf has been an important part of our heritage and should continue to live in the wilds for our children and grandchildren to experience.
- Catron County has investigated and confirmed direct wolf-human conflicts and habituated wolf sightings near children and families (see exhibit D).
- Mexican gray wolves are increasingly showing themselves to be habituated to human environments as demonstrated by reports of wolves near schools, ranches, hunting camps and following children.
- Children may “naturally” be cautious of wild animals and other things they have no personal experience with, but they are not as a rule terrified unless they pick it up from another human.
- You aren’t doing the wolf justice by making him accustom to people and handling him so much. Let’s turn them out and what survives will survive. They are not endangered any more. I heard there is at least 400 or more wolves in captivity right now.





## Appendix C: Presentation of Known Issues



No narrative with this slide

## Mexican Gray Wolf

### Mexican Gray Wolf Recovery

- Began releases in 1998
- Reviews in 2001 and 2005
- Reintroduction will continue




The U. S. Fish and Wildlife Service and its partners have been introducing Mexican gray wolves into the wild since 1998. Based on recent reviews, we have made the decision to continue the wolf reintroduction.

## Mexican Gray Wolf

### “Scoping”


- First steps to determine any changes
- Information-gathering stage
- Want your recommendations

A silhouette of a person wearing a cowboy hat, standing in a field with a fence in the background. The sky is a mix of orange, pink, and purple, suggesting a sunset or sunrise.

This series of scoping meetings and comment period are the first steps in the process of determining how the reintroduction will continue – whether or not there will be changes, and what the changes, if any, might be.

## Mexican Gray Wolf

### Seeking your Input



3 and 5 year reviews

- Six issues identified for input
- Ideas for improvement sought

The [2001](#) and 2005 program reviews identified a number of issues that are limiting the success of the reintroduction, both in terms of the wolf population and in adequately addressing concerns of residents and visitors to the Blue Range Wolf Recovery Area. We are seeking your input on six issues identified in the review process. We also want to hear any other thoughts you may have about improving the reintroduction process.

## Mexican Gray Wolf

### Blue Range Wolf Recovery Area boundary

Wolves moving beyond  
boundary are trapped/re-  
released

- Affects ability to form  
packs/establish home  
ranges
- Return to captivity
- Takes staff time from  
essential monitoring  
activities




Under the current program, wolves that establish home ranges beyond the boundaries of the Blue Range Wolf Recovery Area must be trapped and re-released. Wolves are long-range dispersers; by nature they will move beyond the boundary. This challenges reintroduction in several ways. First, trapping and re-releasing wolves may interfere with their ability to form packs and establish and maintain home ranges. In addition, trapped wolves are placed back into captivity until a new release site is available to them. This takes them out of the wild, and may keep them out for some time. Trapping wolves moving out of the Recovery Area also takes a lot of time, time that field team members could be using to monitor the wolves in the Recovery Area, including tracking wolf movements and addressing depredations.

## Mexican Gray Wolf

### Primary and Secondary Release Zones

New releases in Primary Recovery Zone only

- Limited release sites
- Genetic diversity



Right now, initial Mexican Wolf releases can only occur in the primary recovery zone within the Blue Range Wolf Recovery Area in Arizona. This stipulation poses several obstacles to successful reintroduction. Because of the amount of space a pack needs and the limited size of the primary recovery zone, there are fewer release sites available to successfully add released wolves to the population. Another challenge posed by this requirement is maintaining and enhancing the genetic diversity of the population. We carefully consider the genetic makeup of each wolf, to limit inbreeding among mated pairs. Requiring initial releases only in the primary recovery zone prevents us from pairing a newly released wolf with a lone adult wolf in the secondary recovery zone.

## Mexican Gray Wolf

### Misconceptions about secondary release zone

- From outside BRWRA
- Captured for veterinary care
- Natural movement



An unintended result of having primary and secondary zones is the misconception that the secondary zone is for problem animals relocated only after depredation incidents. In reality, wolves are re-released for other reasons, including those that have left the Recovery Area or wolves captured for veterinary care. Wolves also disperse from the primary to the secondary recovery zone. While we do translocate wolves that engaged in nuisance behavior in other areas into the primary and secondary recovery zones, they are only one component of the population in the area.

## Mexican Gray Wolf

### Harassment Options

- Some provisions for “harassment” of wolves
- Options are limited
- Help needed to identify alternatives



The current program includes some provisions for people to “harass” wolves engaged in nuisance behavior or livestock depredations, but harassment options are limited. A wider variety of harassment methods could provide an effective deterrent to problem Mexican wolf behavior. We need your input in helping us identify all possible alternatives and remedies.



## Mexican Gray Wolf

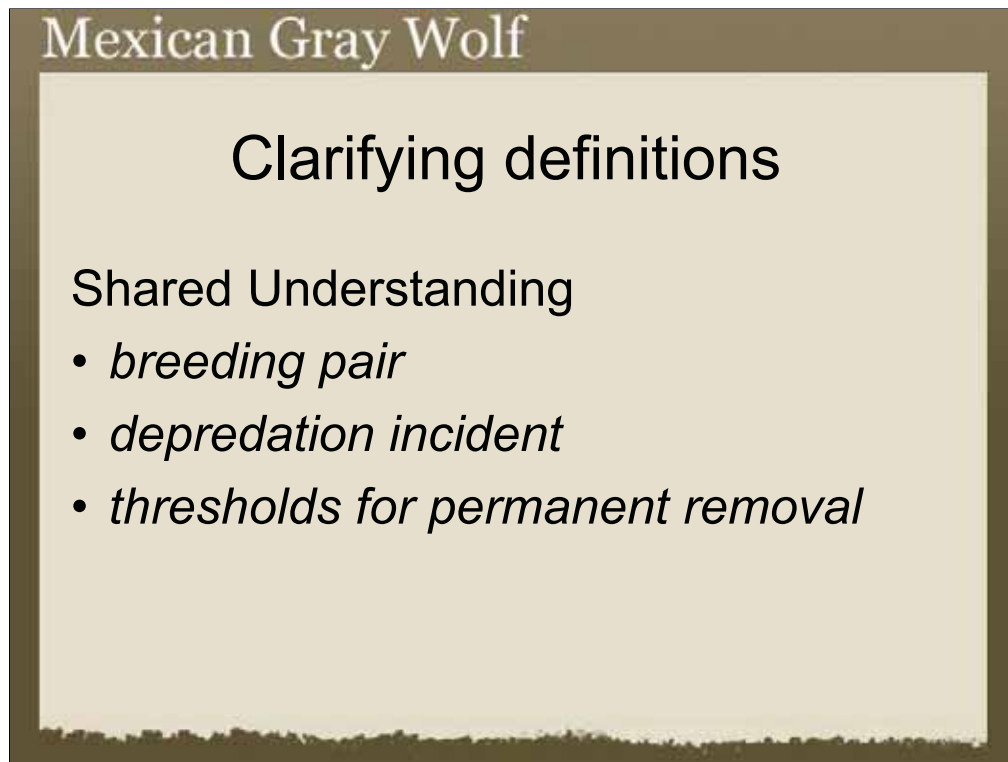
### Protecting Property

- Wolves attacking livestock on private/tribal lands may be shot
- Domestic pets not afforded same protection



Should pet owners  
have same ability?

Wolves in the process of attacking livestock can be shot on private land, but domestic pet owners do not have the same authority under the 1998 Rule to protect their pets. Wolves have injured and killed domestic dogs within the Blue Range Wolf Recovery Area. The current provisions do not allow for “take” of wolves attacking domestic dogs on private or tribal lands. Should pet owners have the same ability to protect their pets as livestock owners do to protect their livestock?




The review process identified the need to clarify several definitions including “breeding pair,” “depredation incident” and “thresholds for permanent removal.” Biologists, residents and other stakeholders may have different understandings of the terminology and we need to develop shared understanding of these and other terms.

## Mexican Gray Wolf

### White Sands Missile Range

Unsuitable as recovery area

- Too small
- Not enough prey



The map shows the state of New Mexico with two recovery areas highlighted in green: the Blue Range Wolf Recovery Area in the west and the White Sands Wolf Recovery Area in the east. A pink arrow points to the White Sands area, which is also highlighted in red. The map includes labels for Phoenix, Tucson, and Albuquerque, and shows major highways like I-10 and I-25.

Finally, The White Sands Missile Range in New Mexico was initially listed as a potential recovery area for Mexican wolves. However, it is not large enough nor is there enough prey for it to function as an independent recovery area.

## Mexican Gray Wolf

### Today's Meeting

- Ask questions
- Tell us your ideas/experiences
- Write comments for public record



We are here to discuss these and other issues with you. We want to hear your ideas and benefit from your experiences. We encourage you to make written comments as well. Written comments will become part of the public record and we want to make sure your input is documented in your own words.



You may submit formal written comments to John Slown, U. S. Fish and Wildlife Service, New Mexico Ecological Services Field Office, 2105 Osuna Road, Northeast, Albuquerque, New Mexico, 87113.



Mexican Gray Wolf

E-mail or fax comments

[www.mexicanwolfeis.org](http://www.mexicanwolfeis.org)

[R2FWE\\_AL@fws.gov](mailto:R2FWE_AL@fws.gov)

Fax: (505) 346-2542

*Comment period ends December 31*

The graphic is a rectangular box with a dark brown border. The top section has a dark brown background with the text 'Mexican Gray Wolf' in a light beige serif font. The main body of the box has a light beige background with black text. The text is centered and includes a website URL, an email address, a fax number, and a comment period end date. The bottom of the box features a dark silhouette of a forest line.

You may also e-mail or fax comments. The comment period ends December 31, 2007.



Thank you for coming and for helping us to improve the Mexican gray wolf reintroduction program.

## Appendix D: Mexican Wolf Display Panel

### The Mexican Gray Wolf

All the wolves initially released into the Blue Range Wolf Recovery Area (not including translocations) are captive-bred. Since they have not lived in the wild, it may take them awhile to learn to hunt for their own food. The current population includes both released wolves and their wild-born offspring.

*Mexican wolf pairs are most likely monogamous. Females give birth to up to four to six pups in April or early May.*



*Mexican wolves are about the size of a German shepherd.*

The Mexican gray wolf is the smallest, rarest, and southern-most occurring wolf in the United States. Once numbering in the thousands, Mexican wolves were eliminated from the U.S. landscape by 1970. Many factors contributed to their demise, including habitat alteration and eradication efforts aimed at protecting livestock and game species. The Mexican gray wolf was reintroduced into the eastern Arizona portion of the Blue Range Wolf Recovery Area (BRWRA) beginning in 1998.



*Disinterest in humans is one of the criteria for selecting wolves for initial release.*



*Mexican wolves live in packs of two to eight animals, consisting of a mated pair and their offspring.*

A wolf pack has a home range of up to several hundred square miles, enough space to meet their needs for food and cover. As a pack, the wolves hunt prey including elk, mule deer, white-tailed deer, javelina, rabbits and other small mammals. They also scavenge dead animals, and can kill livestock.



# Appendix E: Mexican Wolf Display Panel

## Strategizing a Comeback



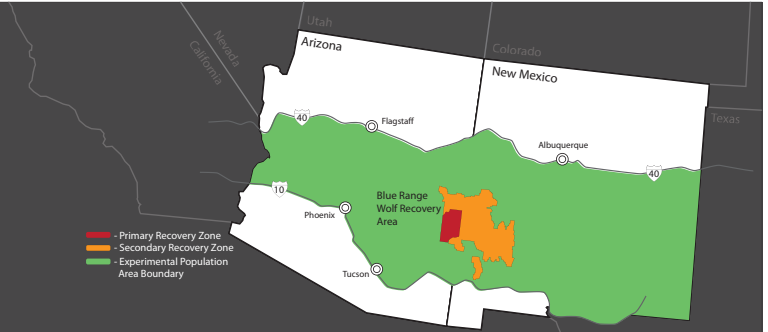
The re-introduced population of wolves in the Mexican wolf experimental population area is designated as "nonessential, experimental." This means that the federal protection these wolves receive is less restrictive than protection of species with "endangered" status. Therefore, wolves may be harassed, injured or killed (called "take") in circumstances as defined in the 1998 10(j) Rule governing the reintroduction.

Six state, federal and tribal agencies, as well as five signatory cooperators manage the Mexican wolf reintroduction process. These entities make up the Adaptive Management Oversight Committee (AMOC). An Interagency Field Team works under the guidance of AMOC, using a series of 28 Standard Operating Procedures to guide daily management of wolves. Citizens are also involved -- the Adaptive Management Working Group is comprised of members of the public who identify local issues and citizen concerns.



All the wolves initially released into the Blue Range Wolf Recovery Area (not including translocations) are captive-bred. Since they have not lived in the wild, it may take them awhile to learn to hunt for their own food. The current population includes both released wolves and their wild-born offspring.

All wolves in the program are descendants of seven wolves. Five of the seven were wild-caught in Mexico before 1980, and two were selected from captive populations. Today's captive breeding program includes more than 300 wolves in 47 zoos and sanctuaries across the United States and Mexico.



The Blue Range Wolf Recovery Area encompasses the Apache-Sitgreaves National Forest and the Gila National Forest, and is divided into primary and secondary recovery zones. This is the area where the re-established Mexican wolf population is managed and maintained.

In 1982, U.S. and Mexican wildlife agencies adopted the Mexican Wolf Recovery Plan, which called for maintaining a captive breeding program and re-establishing a population of at least 100 Mexican wolves within a small portion of their historic range.

- Experimental Population Area Boundary**

This is part of Arizona and New Mexico south of Interstate 40 and north of Interstate 10, as shown. Wolves that move outside of the Blue Range Wolf Recovery Area are considered part of the "nonessential, experimental" population as long as they stay within the Experimental Population Area boundary. If a wolf is captured in this area but outside of the BRWRA, it will be re-released within the recovery area or put into the captive population. The Service will NOT release wolves outside of the designated Blue Range Wolf Recovery Area into this larger Experimental Population Area. Wolves found outside of the Experimental Population Area Boundary are afforded full protection under the Endangered Species Act.
- Blue Range Wolf Recovery Area (BRWRA)**

The re-established Mexican wolf population is managed and maintained within this boundary. Wolves moving outside this boundary are captured and released back into it. The Blue Range Wolf Recovery Area is divided into Primary and Secondary Recovery Zones.
- Primary Recovery Zone**

This area, in Arizona, is the only part of the Blue Range Wolf Recovery Area where captive-bred wolves (with no experience in the wild) may be released. Captive-bred wolves with wild experience can be translocated into the Secondary Recovery Zone.
- Secondary Recovery Zone**

This national forest land next to the Primary Recovery Zone is an area where wolves are allowed to disperse. Wolves with experience in the wild, as well as those born in the wild, may also be moved to and released in this zone.



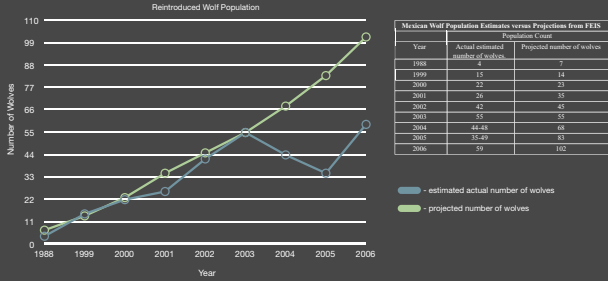
**Signatory Cooperators:**  
 Graham County, AZ  
 Greenlee County, AZ  
 Navajo County, AZ  
 New Mexico Department of Agriculture  
 Sierra County, NM

# Appendix F: Mexican Wolf Display Panel

## Roadmap to Recovery

At the beginning of 2007, there were a minimum of 59 Mexican wolves, including seven breeding pairs, confirmed in the wild. Biologists arrived at this figure by using a helicopter in January to locate and count members of all groups containing radio-collared wolves (biologists counted all collared and visible non-collared members). In addition, field teams utilize howling surveys, observations, and snow-tracking "counts" every December and January to estimate the number of groups without collars. Although 59 is a minimum number, biologists are confident that this is close to the actual number.

The Mexican wolf reintroduction program has undergone reviews in 2001 and 2005, and the U.S. Fish and Wildlife Service determined the reintroduction project would continue. Your input is needed to help determine what changes, if any, need to be implemented as the reintroduction continues.



Population projections were based on an average litter size of four to six pups. However, data show an average of 2.1 pups per litter in the reintroduced population. Scientists speculate that some pups might die in the den, since pups aren't counted until leaving it at four to six weeks. Biologists don't count the pups in the den, because female wolves may relocate or abandon them as a result of the disruption.



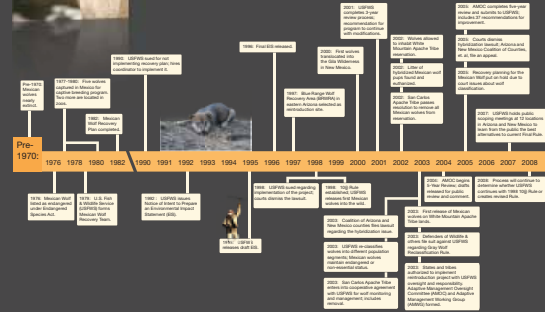
Adult wolves are fitted with radio collars before release. Biologists closely monitor the population and produce monthly reports about the wolves and wolf packs, recording information such as pack location, denning sites, and possible depredations.



The Mexican Wolf Recovery Plan population proposal of 100 wolves for the Blue Range Wolf Recovery Area was based on research from other North American wolf recovery areas. However, the terrain is different in the Blue Range Wolf Recovery Area. Year-round grazing means that wolves encounter livestock more frequently, leading wolves to kill more livestock than in other parts of the country. Because of the increased number of depredations, a higher proportion of Mexican wolves are removed from the wild than are gray wolves living in northern climates.



Some of the captive-bred wolves are introduced using a "modified soft release" approach. They are placed in pens of one-quarter acre or smaller. Because they have been raised in captivity, this approach allows the wolves to orient to the wild.



# Appendix G: Mexican Wolf Display Panel

## Food for survival

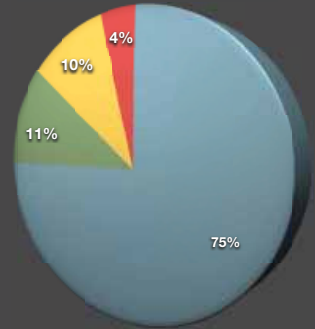
Mexican wolves have been released into some of the mountainous forests and woodlands within their known historic range. They eat large and small mammals, and depend on a healthy population of large ungulates (elk, deer) to survive. They obtain most of their liquids through their food.

While wolves can impact prey populations, it's usually because there are other factors involved that also stress the prey – deep snow, drought, or disease. Wolf-predator studies show that most wolves rarely eliminate their prey, but may influence the size of prey populations. For instance, a prey population that was increasing without wolves would still increase with the presence of wolves, but more slowly. Also, if the prey population was already declining, the presence of wolves could accelerate the decline.

## Mexican Wolf Diet

*Estimated diet of wolves in the Blue Range Wolf Recovery Area based on diet analysis. Intensive monitoring shows that elk are the most common prey.*

- Elk
- Small Mammals / Unknown
- Deer
- Livestock



Pack hunting revolves around the chase, as wolves are able to run for long periods before relenting. It takes careful cooperation for a pack to take down large prey, and the rate of success is low. As a result, Mexican wolves usually feed only a couple of times a week, eating up to 20 pounds of meat at a time.



Several paved roads cross the Blue Range Wolf Recovery Area. Some established wolf home ranges include segments of paved roads; wolves use roadways as travel corridors and do not hesitate to cross roads. Roads may, however, impact the wolves' reintroduction success due to collisions and increased interactions with humans.

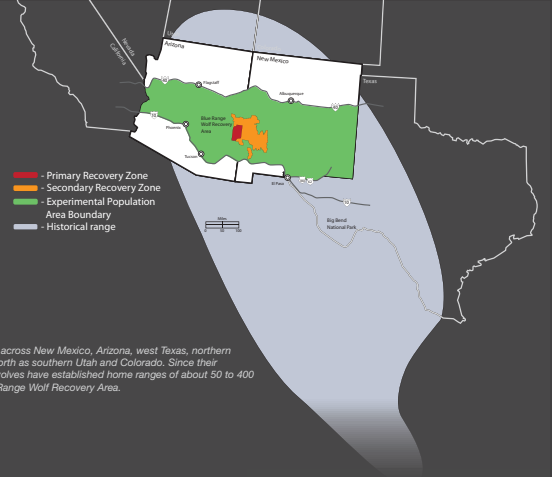


A biologist, above, looks at a cow elk killed by wolves. People hunt the same game that wolves prey upon.

# Appendix H: Mexican Wolf Display Panel

## The Mexican Wolf Range

Most wolf packs consist of two to eight wolves. Studies on wolf populations in other parts of the country have shown that some wolves will establish a territory (a defendable area within their home range) close to their release site, while others will move hundreds of miles away.



Mexican wolves once ranged across New Mexico, Arizona, west Texas, northern Mexico, and possibly as far north as southern Utah and Colorado. Since their reintroduction, the released wolves have established home ranges of about 50 to 400 square miles within the Blue Range Wolf Recovery Area.



About 25 wolves wear radio telemetry collars. Biologists locate them about once a week to learn about their movements, home range, prey selection and other behavioral information.



Distribution of wolves is limited by the 1988 10(j) Rule, which does not allow wolves to establish territories outside of the Apache-Sitgreaves National Forest, the Gila National Forest and the Fort Apache Indian Reservation. Currently, wolves that leave the recovery area must be trapped and placed into captivity or re-released back into the recovery area.



The Luna Pack, shown here, is one of about 11 distinct packs of Mexican wolves distributed across the Apache-Sitgreaves National Forests and Fort Apache Indian Reservation in Arizona, and the Gila National Forest in New Mexico.



Human-related causes, such as gunshot wounds or vehicle collisions, are the leading causes of death of Mexican wolves (56 percent). Despite these hazards, however, wolves are not necessarily deterred from establishing home ranges near roads and other developments.

# Appendix I: Mexican Wolf Display Panel

## Working Together

In most of the Blue Range Wolf Recovery Area, cattle graze all year on public lands. Year-round grazing gives wolves more opportunities to encounter livestock. Wildlife services personnel have documented about 70 probable or confirmed depredations or livestock injuries since 1998. Reports are investigated by the USDA Wildlife Services as soon as possible, usually within 24 hours of the incident. Occasionally, suspected wolf depredations are the result of lion, bear, domestic dog or coyote kills, or other causes of death. When petitioned by livestock owners, an organization, Defenders of Wildlife, reimburses owners for the cost of livestock lost to confirmed wolf depredations.



*The rate of wolf interactions with livestock and people is higher in most of the Blue Range Wolf Recovery Area than it is in other areas of the country where wolves have been reintroduced.*



Wolves are adaptable. They don't require habitat management or manipulation to succeed. Rather, their interactions with humans make successful reintroduction a challenge. Agencies work together to manage interactions among wolves, livestock, and people, and have specific Standard Operating Procedures in place to guide them.



*Biologists and agency officials review all cases of possible depredation. They proved that this calf was killed and eaten by wolves.*



*Released wolves are conditioned to avoid humans. However, they can become habituated to humans if fed - as can bears, foxes and coyotes.*

Wolves defend their areas against coyotes and dogs, so people who walk with dogs in the Blue Range Wolf Recovery Area should take precautions and be aware of the potential for conflict. If a wolf is seen near livestock, owners can scare it off by yelling, chasing, and throwing objects near but not at it. Owners also can discharge firearms, but not in the direction of the wolves. Agencies are continuing to research methods to minimize damage caused by wolves.

## Appendix J: Mexican Wolf Display Panel

### Current Regulations

Under the current Rule, you **MAY**:

- Harass a wolf without injuring it, and report this within 7 days.
- Kill or injure a wolf in the act of killing your livestock on private or tribal lands, and report it within 24 hours.
- Kill, injure or harass a wolf in the defense of human life, and report it within 24 hours.

You may **NOT**:

- Kill a wolf in the act of injuring livestock on public lands
- Kill a wolf feeding on dead livestock
- Kill a wolf just because it is near your property
- Kill a wolf in the act of injuring your pet
- Enter official enclosures or rendezvous sites (where there is denning behavior)
- Shoot a wolf just because you thought it was a coyote or something else



Wolves can contract rabies and then pass the disease to other animals and humans just like any species of mammal, but this has only rarely been documented. Still, people should always be cautious when traveling in wolf range. If you encounter a wolf, remain calm, stand tall, make a loud noise, and slowly back away.



Photographed from an airplane, two Mexican wolves feed on a cow.



A wolf in the Hawk's Nest pack approaches a stream in the Blue Range Wolf Recovery Area in Arizona.



Agency biologists investigate the possible depredation of a cow.

## Appendix K: Mexican Wolf Display Panel

### Balancing Act

Wolves deemed eligible are released in the Primary Recovery Zone within the Blue Range Wolf Recovery Area. After release, biologists continue to closely monitor the wolves. All adult-sized wolves are fitted with radio collars before they are released. In addition, biologists place radio collars on some wild-born wolves that are captured after reaching adulthood. Biologists use radio signals emitted from the collars to track and record the wolves' movements. This helps biologists monitor the wolves, including identifying denning locations to monitor reproduction, monitoring the movements of packs, and tracking locations of specific wolves when suspected depredation occurs.

Managing reintroduced Mexican wolves is a continual balancing act between increasing the number of wolves and protecting the interests of people.

There were no wild Mexican wolves in the United States when the Species Survival Plan was implemented in 1977. To begin the breeding program, five wild wolves were captured in Mexico and two genetically suitable wolves were located in captivity. All seven were taken into the captive breeding program and are the "founders" of the current Mexican gray wolf population.

Program biologists use mules to transport wolves to release sites in roadless areas.



Wolves that injure or kill livestock three times within a 365-day period are removed from the wild. Removal methods are guided by Standard Operating Procedures and include either relocation to another part of the Blue Range Wolf Recovery Area or permanent removal (permanently returned to captivity or euthanized). Since the reintroduction of wolves in 1998 through March 2007, 82 wolves have been removed after killing livestock.



Other than contact to monitor health, human contact with wolves is limited at the pre-release facilities. Wolves are evaluated and selected for release based on genetic makeup, reproductive performance, behavior, health, and overall response to the adaptation process. The genetic makeup of each Mexican gray wolf is documented in a "stud book" to ensure the population represents a healthy genetic mix.



The captive breeding program consists of more than 300 wolves in 47 facilities across the U.S. and Mexico. The program is the only source of Mexican wolves available to re-establish the population in the United States. Wolves identified for potential release are first sent to one of three pre-release sites: Sevilleta (shown above) and Ladder Ranch Wolf Management Facilities in New Mexico and Wolf Haven International in Washington state.

# Appendix L: Mexican Wolf Display Panel

## Involving the Public

Today's "scoping" meeting is the first step in the National Environmental Policy Act (NEPA) process. You will learn about the wolves and the process, and you can ask questions of and talk with the people who actually run the program. This is an information-gathering step, needed to identify all the factors that need to be taken into account in developing alternatives to the 1998 10(j) Rule. You will be given the opportunity to provide written comments as well.

- Information from the scoping meetings will be reviewed by all agencies and governments involved in the program.
- A socioeconomic analysis will be conducted to identify the consequences of amending the 1998 10(j) Rule.
- A draft Environmental Impact Statement (EIS) will be written.
- The draft EIS will be presented to the public for further review, including another round of public meetings where you can express your opinions on options offered in the draft EIS.

Sevilleta Wolf Management Facility in New Mexico



Fences mark grazing borders in Arizona. The flagging on the fence is fladry, which has been shown to discourage wolves from crossing the fence.



After this round of public meetings:

- Your comments will be considered, along with current knowledge of Mexican wolf habitat use and needs, to make any changes to the 1998 10(j) Rule.
- A draft EIS will be developed, incorporating and analyzing a range of alternative strategies for Mexican wolf reintroduction.
- A proposed new 10(j) Rule will be published in the Federal Register to solicit further comments.
- Afterwards, the draft EIS will be finalized and, depending on the outcome of the process, officials either will continue with the 1998 10(j) Rule, or publish a new 10(j) Rule incorporating changes based on input from all the above steps.

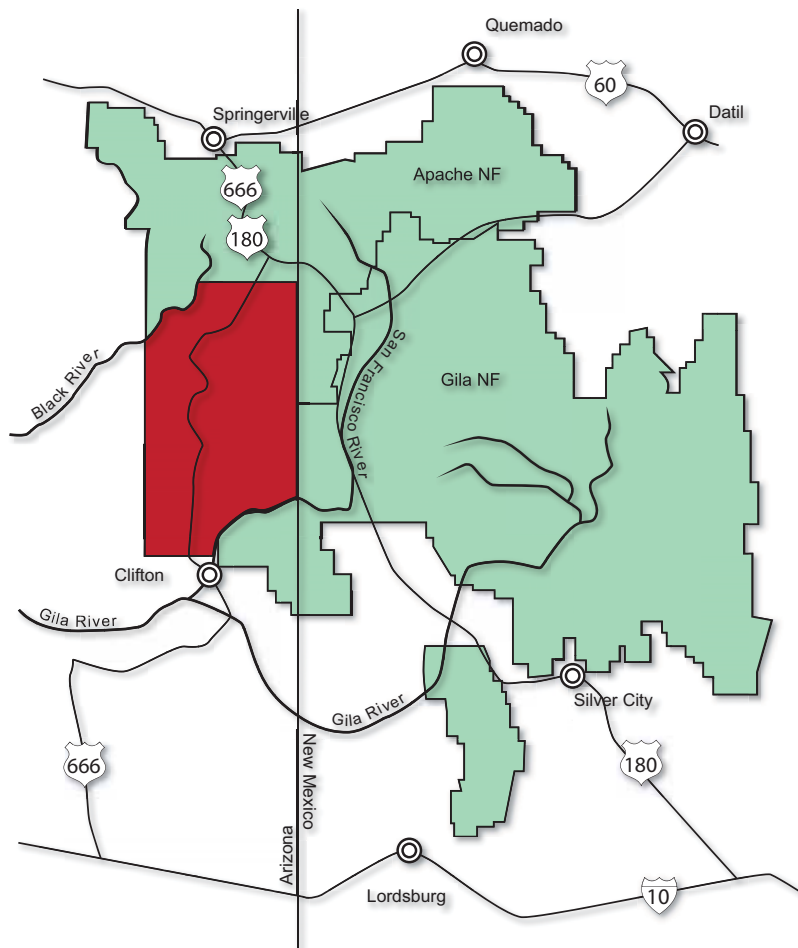
Your opinions, suggestions and concerns are important. As a result of the five-year review in 2005, agency officials have decided to continue the Mexican wolf reintroduction. Ending the reintroduction of wolves to the Blue Range Wolf Recovery Area is not being considered. Rather, agency officials are looking for your help to improve the program, and to discuss potential changes to the reintroduction and management process.



## Appendix M: Mexican Wolf Display Panel

### Blue Range Wolf Recovery Area (BRWRA)

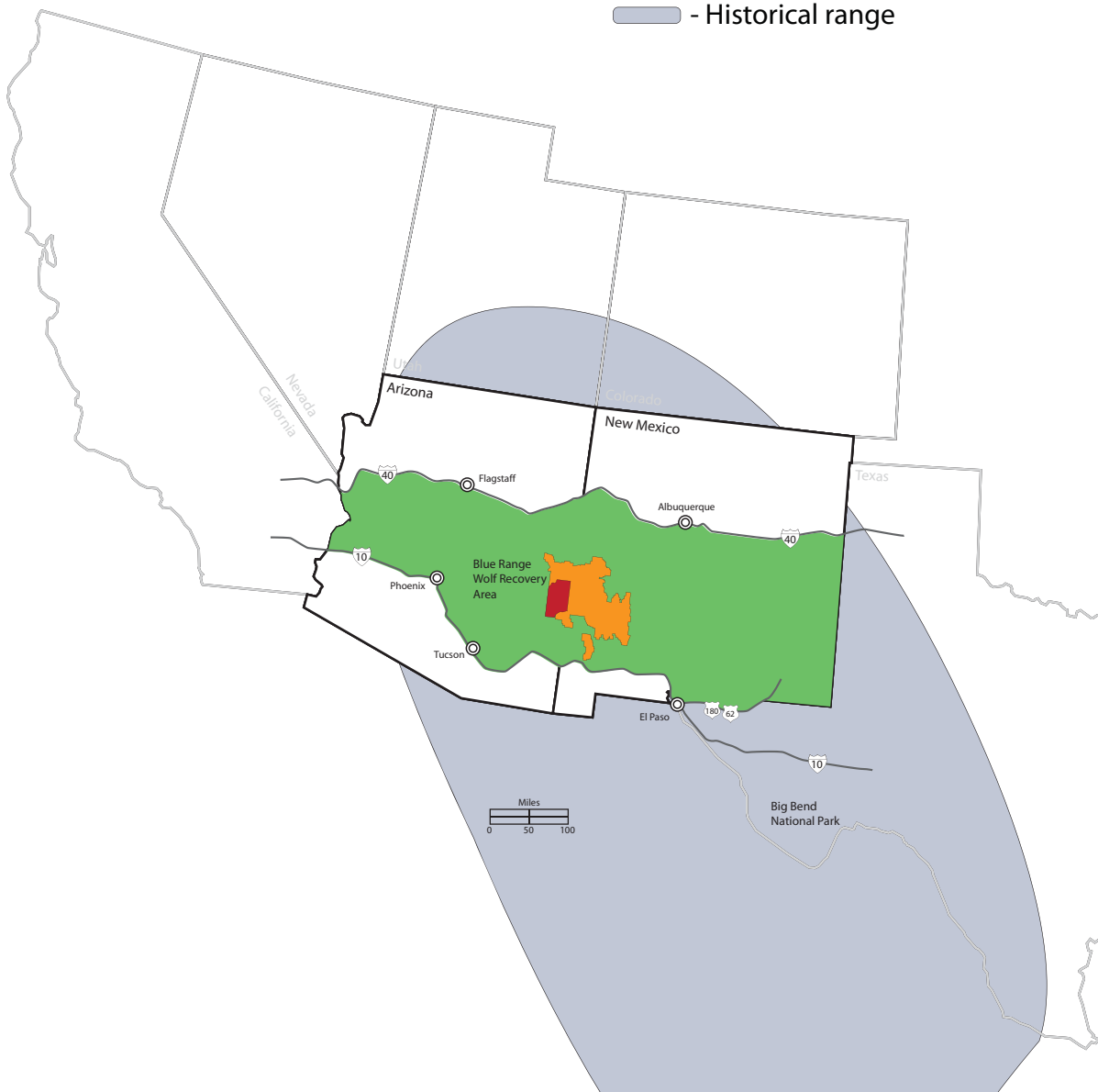
-  - Primary Recovery Zone
-  - Secondary Recovery Zone



## Appendix N: Mexican Wolf Display Panel

### Historic Range

- █ - Primary Recovery Zone
- █ - Secondary Recovery Zone
- █ - Experimental Population Area Boundary
- █ - Historical range



# Appendix O: Comment Card



### Mexican Gray Wolf Your Input Requested

The U. S. Fish and Wildlife Service and its partners have been reintroducing Mexican gray wolves into the wild since 1998. Based on recent reviews, we have made the decision to continue the wolf reintroduction.

This scoping meeting is the first step in the process of determining how the reintroduction will continue – whether or not there will be changes, and what the changes, if any, might be. There will be additional opportunities for involvement over the next year as the process moves forward.

The scoping step is the information-gathering stage. We want to hear from you about what you have learned during this time. We want your recommendations for recovering the Mexican wolf.

John Storn  
 U. S. Fish and Wildlife Service  
 New Mexico Ecological Services Field Office  
 2105 Osuna NE  
 Albuquerque, NM 87113



### AT TODAY'S MEETING you have the opportunity to:

- Review information about Mexican gray wolves and the current reintroduction process
- View a 5-minute presentation describing why we are considering changes to the reintroduction process. This presentation will be made every 15 minutes with the last showing 15 minutes before the end of the meeting.
- Talk one-on-one with agency representatives; ask questions and provide information
- Submit your formal written comments
- Sign up to receive updates on the process

All of the information presented at this meeting is at [www.mexicanwolfeis.org](http://www.mexicanwolfeis.org).



### How to Submit Comments

Written comments accompanied by name and address will become part of the formal record of the scoping process. While you may provide your ideas verbally during the meeting, we want to make sure your input is formally captured in your own words. You may submit written comments in three ways:

- Fill out the comment portion of this brochure and leave it in the drop box
- Take the brochure with you and return it by mail
- Provide comments via e-mail. For your convenience, you can do that here at the computer station, or visit [www.mexicanwolfeis.org](http://www.mexicanwolfeis.org)
- Faxed comments may be sent to (505) 346-2542

Please note: In order to be considered part of the formal record, your comments must include your name and address. Comments may be submitted through December 31, 2007.

Before including your address, phone number, e-mail address, or other personal information in your comment, you should be aware that your entire comment--including your personal information--may be made publicly available at any time. While you can ask us in your comment to withhold your personal information from public review, we cannot guarantee that we will be able to do so.

### Comments:

Name: \_\_\_\_\_

Street: \_\_\_\_\_

City, State, Zip : \_\_\_\_\_

Tape closed with address on outside, and add a stamp.

DO NOT STAPLE  
Thank you for your input!

## Appendix P: Meeting Attendance

Agency representatives, facilitators, participants and comments received at each public scoping meeting

DATE	LOCATION	AGENCY REPRESENTATIVES *	FACILITATORS	PARTICIPANTS	COMMENTS RECEIVED
11/26	Flagstaff, AZ	John Slown, FWS John Morgart, FWS Cathy Taylor, USDA-FS Dave Cagle, AGFD Cynthia Dale, WMAT David Bergman, USDA-APHIS David Hayes, USDA-APHIS	Ginny Wallace Dan Witter (DJ Case)	117	62
11/27	Hon-dah, AZ	John Slown, FWS John Morgart, FWS Cathy Taylor, USDA-FS Dave Cagle, AGFD Cynthia Dale, WMAT David Bergman, USDA-APHIS David Hayes, USDA-APHIS Jeff Humphrey, FWS Bruce Sitko, AGFD	Ginny Wallace Dan Witter	27	6
11/28	Alpine, AZ	John Slown, FWS John Morgart, FWS Cathy Taylor, USDA-FS Dave Cagle, AGFD Cynthia Dale, WMAT David Bergman, USDA-APHIS David Hayes, USDA-APHIS Matt Wunder, NMDGF Jeff Humphrey, FWS	Ginny Wallace Dan Witter	39	6
11/29	Grants, NM	John Slown, FWS John Morgart, FWS David Bergman, USDA-APHIS David Hayes, USDA-APHIS Alan May, USDA-APHIS Matt Wunder, NMDGF Renaë Held, NMDGF Charna Lefton, FWS	Ginny Wallace Dan Witter	66	5

DATE	LOCATION	AGENCY REPRESENTATIVES *	FACILITATORS	PARTICIPANTS	COMMENTS RECEIVED
11/30	Albuquerque, NM	John Slown, FWS John Morgart, FWS Cynthia Dale, WMAT David Bergman, USDA-APHIS David Hayes, USDA-APHIS Alan May, USDA-APHIS Matt Wunder, NMDGF Renaë Held, NMDGF Bobbie Barrera, USDA-FS Charna Lefton, FWS	Ginny Wallace Dan Witter	267	93
12/1	Socorro, NM	John Slown, FWS John Morgart, FWS Alan May, USDA-APHIS Bobbi Barrerra, USDA-FS Matt Wunder, NMDGF Renaë Held, NMDGF Luis Rios, NMDGF Marty Frenzel, NMDGF	Ginny Wallace Dan Witter	65	9
12/3	Alamogordo, NM	John Slown, FWS John Morgart, FWS David Bergman, USDA-APHIS Alan May, USDA-APHIS Matt Wunder, NMDGF Renaë Held, NMDGF Marty Frenzel, NMDGF	Dave Case Phil Seng (DJ Case)	197	12
12/4	Las Cruces, NM	John Slown, FWS John Morgart, FWS David Bergman, USDA-APHIS Alan May, USDA-APHIS Matt Wunder, NMDGF Renaë Held, NMDGF Luis Rios, NMDGF Jose Viramontes, FWS	Dave Case Phil Seng	135	16
12/5	Glenwood, NM	John Slown, FWS John Morgart, FWS Alan May, USDA-APHIS Matt Wunder, NMDGF Renaë Held, NMDGF Luis Rios, NMDGF Luke Shelby, NMDGF Charna Lefton, FWS	Dave Case Phil Seng	134	21

DATE	LOCATION	AGENCY REPRESENTATIVES *	FACILITATORS	PARTICIPANTS	COMMENTS RECEIVED
12/ 6	Safford,AZ	John Slown, FWS John Morgart, FWS Cathy Taylor, USDA-FS Cynthia Dale,WMAT David Bergman, USDA-APHIS Ryan Gordon, FWS Dave Cagle, AGFD Frank Hayes, USDA-APHIS	Dave Case Phil Seng	12	4
12/7	Tucson,AZ	John Slown, FWS John Morgart, FWS Cathy Taylor, USDA-FS David Bergman, USDA-APHIS Dave Cagle, AGFD Sarah Rinkevich, FWS Jon Cooley, AGFD	Dave Case Phil Seng	139	35
12/8	Phoenix,AZ	John Slown, FWS John Morgart, FWS Cathy Taylor, USDA-FS David Bergman, USDA-APHIS Ryan Gordon, FWS Sarah Rinkevich, FWS Jeff Humphrey, FWS Bill Van Pelt, AGFD	Dave Case Phil Seng	88	48
<b>totals</b>				<b>1286</b>	<b>317</b>

\* White Mountain Apache Tribe  
 US Department of Agriculture-APHIS Wildlife Services  
 US Department of Agriculture-Forest Service  
 Fish and Wildlife Service  
 New Mexico Department of Game and Fish  
 Arizona Game and Fish Department

