

Regional Director Amy Lueders
U.S. Fish & Wildlife Service
Via email: RDLueders@fws.gov

July 12, 2018

RE: Release of family packs of endangered Mexican gray wolves to address inbreeding

Dear Director Lueders,

The undersigned 25 organizations and two individuals request that the U.S. Fish and Wildlife Service resume releasing into the wild pair-bonded adult male and female Mexican gray wolves with pups – the means by which reintroduction was initiated in 1998 and successfully undertaken until abandoned under political pressure in 2007. We specifically request the release of three packs this summer into the Gila Wilderness in New Mexico, timed for presence of elk calves which would facilitate such packs learning to hunt. Absent such family pack releases the Service will not follow even the insufficient measures pledged in the Mexican Wolf Recovery Plan that was published just last year. More consequentially, the crisis of inbreeding that is imperiling the Mexican wolf would continue to worsen.

The November 2017 *Mexican Wolf Recovery Plan, First Revision* and the accompanying Recovery Implementation Schedule and Biological Report, the latter of which includes a population viability analysis, comprise the Service’s road-map for recovering the Mexican wolf – a road-map which we believe to be misguided, and which some of the signatories below are currently litigating over. Nonetheless it is imperative that, at a bare minimum, the Service adhere to the inadequate schedule for wolf releases outlined therein

The Recovery Implementation Schedule calls for “Cross-foster[ing] 12 wolf pups/year” for sixteen years and for “Releas[ing] pairs with pups if cross-fostering is deemed unsuccessful,” and projects that need to occur every four years over the course of sixteen years.¹ Success is defined by the Biological Report as “pups surviving and breeding, such that their genetic material is integrated into the wild population.”²

Leaving for the future quantification of eventual breeding by wolves who were released as pups – since it is still early but so far pups cross-fostered from captivity into the wild have not reproduced – the success of pups known to survive to date can still be measured. And their rate of known survival is much lower than the biological report’s population viability assessment predicted in arriving at the conclusion that wolf releases would shore up genetic health and contribute to eventual recovery. The population viability assessment predicted average annual pup mortality at 28.2%,³ and on that basis (as well as on the basis of projected yearling and adult mortality rates) the recovery plan calls for releases of approximately 70 wolves over 16 years in

¹ [Recovery Implementation Schedule](#), Table 1 Implementation Schedule for Mexican Wolf Recovery, Activity Numbers 2.1.2 and 2.1.3, p. 6 (p. 21 of PDF pagination).

² [Biological Report](#), p. 29 (p. 37 of PDF pagination).

³ [Biological Report](#), Population Viability Analysis, p. 6 (p. 70 of PDF pagination).

order to ensure that 22 wolves survive to age two if they are released as pups or survive one year following release if they are released as adults.⁴ Yet, among the ten pups that were released in 2016 (six) and 2017 (four), just one pup each year was known to be alive at the end of the year – for an apparent mortality rate of 83.3% in 2016 and 75% in 2017 or a two-year average annual apparent-failure rate of 80%. Any of those metrics is much higher than the projected 28.2% mortality rate, so even if (as we hope) additional subadult or adult wolves will be identified as animals that were cross-fostered from captivity, the pup-mortality rate is still likely too high.

Not only does the pup-mortality rate suggest lack of success, and thus argues for releases of family groups but, even more conclusively, the rate of wolf-pup releases compared to the intended rate of releases demonstrates a lack of success – and thus should trigger additional family releases on top of those prompted by high pup-mortality.

Whereas the Service intended to release through cross-fostering twelve pups per year, over the past three seasons (i.e. 2016 – 2018 in the spring when wolf pups are born) it released just half that many: six in 2016, four in 2017 and eight in 2018 – totaling eighteen, which represents a shortfall of eighteen pups from the 36 that the implementation plan calls for releasing from 2016 through 2018. That shortfall alone suffices to trigger the need for releases of adult pairs with pups, according to the Service’s own recovery documents.

Please understand that even adhering to the recovery plan would mean very dicey prospects for actual recovery, so its wolf-release standards that we cite should not be considered merely aspirational targets. Comments on the draft recovery plan submitted to the Service pointed out that the planned releases are not enough because the biological report underestimates the deleterious effects on reproduction of inbreeding and thus is too optimistic about the probability of these wolves successfully mating and gestating and rearing pups.⁵ According to newly-published research on the wild U.S. Mexican wolf population, “genetic variation continues to deteriorate . . . possibly . . . due to inbreeding and drift.”⁶ This is particularly alarming because as far back as eleven years ago, research demonstrated that lack of genetic variation among the wild Mexican wolves caused inbreeding depression as observed in reductions in reproduction and pup-survival rates.⁷ The fact that inbreeding now is further lowering genetic variation – which will then further affect reproduction – illustrates accelerating risk to the population and to the entire Mexican gray wolf subspecies.

We implore you to take the necessary steps to arrest the inbreeding, genetically-rescue the wild U.S. population, and keep alive the possibility of recovery of this beautiful, intelligent and social mammal that is much beloved by the people of the Southwest and that is critical to the

⁴ [Recovery Plan](#), p. ES2 (p. 11 of PDF pagination)

⁵ See for example Peter and Jean Ossorio’s letter of Aug. 26, 2017, pp. 12-13; Dr. C. Carroll’s letter of Aug. 28, 2017, pp. 4-8, 16-20; Dr. R. Fredrickson’s letter of Aug. 29, 2017, pp. 2-4; Turner Endangered Species Fund’s letter of Aug. 29, 2017, pp. 2, 4; WildEarth Guardians’s letter of Aug. 29, 2017, pp. 10-11; and Center for Biological Diversity’s letter of Aug. 29, 2017, pp. 29-30.

⁶ Fitak, R. R., S. E. Rinkevich and M. Culver, 2018. Genome-wide analysis of SNPs is consistent with no domestic dog ancestry in the endangered Mexican wolf (*Canis lupus baileyi*), *Journal of Heredity*, 109(4):372-383, p. 378.

⁷ Fredrickson, R. J., P. Siminski, M. Woolf and P. W. Hedrick, 2007, Genetic rescue and inbreeding depression in Mexican wolves, *Proc. R. Soc. B*, 274:2365–2371.

conservation of its ecosystems. Those necessary next steps are the release into the Gila Wilderness, without further delay, of at least three pair-bonded adult Mexican wolves with their pups.

Thank you for your consideration.

Sincerely endorsed by,

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