

Brady McGee, Mexican Wolf Recovery Coordinator
Amy Lueders, Southwest Regional Director
U.S. Fish and Wildlife Service

March 20, 2019

Via email: Brady_Mcgee@fws.gov and Amy_Lueders@fws.gov

Dear Recovery Coordinator McGee and Regional Director Lueders,

The undersigned 37 organizations request immediate cessation of efforts to remove alive or kill wolves of the Prieto Pack or other wolves in or near the Rainy Mesa area of the Gila National Forest, rescission of the March 6, 2019 wolf removal order, and the expeditious freeing of the two young female wolves who were recently captured and are being held in pens at Sevilleta National Wildlife Refuge.

There are many reasons that the remaining wolves in the Rainy Mesa area should be left unmolested and the captured wolves freed. As a matter of equity, we note that the Fish and Wildlife Service's resistance to enacting basic measures to ensure that wolves do not scavenge on livestock carcasses – measures repeatedly recommended by independent scientists – may be the root of the ongoing conflict on Rainy Mesa. Over and over in past years, overstocked cattle on Rainy Mesa died of non-wolf causes. Wolves then scavenged on the carcasses, stayed near vulnerable cattle, and began hunting them. The Service should change course and require that owners of livestock that die of non-wolf causes remove or render inedible such carrion (for example through lime) before wolves scavenge and then depredate. In the meantime, you should not make the Prieto Pack and the two young captured wolves the scapegoats for a problem that the Service had the means to correct but chose to disregard.

Furthermore, following the unprecedented and heart-breaking deaths of 21 wild wolves in 2018 (a 50% increase over the next-highest year of wolf mortality in 2016), the Service should seek more than ever to keep wolves alive in the wild, not trap or shoot them out of the wild.

In addition, past wolf-removal operations on Rainy Mesa as well as elsewhere have pushed the Mexican wolf further from eventual recovery, and that will almost certainly be the case if you persist in removing wolves now. Over the course of two decades, the Fish and Wildlife Service's wolf-removal orders have resulted in the U.S. reintroduced population not reaching the Service's predictions for demographic growth. For example, the Service's 1996 final environmental impact statement on the reintroduction program projected 18 breeding pairs in the wild by 2005.¹ Now, over 13 years later and with the definition of a "breeding pair" watered down by the Service in its 2015 revision to the 10(j) management rule in order to mask its own shortfalls – there are still not 18 breeding pairs in the wild.

The Service's removals of wolves from the wild have also resulted in ominous losses of genetic diversity that are considerably harder to restore. "Mean kinship" is a numeric fraction that measures the average relatedness of animals in a population; the higher that fraction, the more closely related are the animals. In 2009, the mean kinship in the reintroduced Mexican

¹ Reintroduction of the Mexican Wolf Within Its Historic Range in the Southwestern U.S., Final Environmental Impact Statement, Nov. 1996, Table 2-2, p. 2-8.

wolf population was 0.2196.² Today, it has increased significantly to 0.25,³ to the point at which almost every wolf in the population is related to every other wolf as if they were siblings.

Close relatedness among Mexican wolves is correlated with reductions in the numbers of pups born and reductions in the number that are born that end up surviving.⁴ The Service's reckless wolf removals including trapping and shooting of genetically valuable wolves prior to 2009, played a major role in the calamitous increase in inbreeding over the past ten years.

Halting attempts to remove additional wolves and freeing those recently caught is the best course of action to avoid further exacerbating the genetic crisis. In the past, 16 captured wolves died inadvertently due to capture. Many other captured wolves were never bred in captivity. Whether dying within minutes or weeks of capture, or surviving another decade but without progeny, these wolves' potential genetic contributions were entirely lost due to removal actions that, at the time, the Service characterized as of little consequence.

Moreover, wolves taken from the wild occupy pens that otherwise could have housed members of the next captive-born generation. This tradeoff means that placement of wild-born wolves in captivity curtails opportunities for the breeding of captive-born wolves with underrepresented genetic heritages. The repeated captures of wolves from the wild and the resulting paucity of pen spaces hasten the erosion of genetic diversity from the captive population, a worrisome long-term trend.

We are aware that the Service may seek to kill one or more wolves on Rainy Mesa. Of course, such an action would greatly increase the possibility of loss of genetic diversity from the wild population, particularly since targeted wolves without radio collars may unknowingly harbor rare genes. The Service and USDA Wildlife Services have shot 15 wolves thus far since reintroduction. These slain animals represent not just governmental callousness but also foreclosed genetic opportunities.

In sum, any course of action now except allowing wolves to stay in the wild and releasing the recently-caught wolves, is likely to further worsen the Mexican wolf's already-dire genetic status and undermine recovery. The life of one of the first wolves to be released at the outset of reintroduction in 1998, AF511 or "Brunhilda," the alpha female of the Francisco Pack, illustrates the peril of continuing the status quo approach to management. For many years, Brunhilda was the poster-wolf of the entire recovery effort; her oversized image may still grace the Washington, D.C. offices of the Service, and we reproduce it here:



² Siminski, D. P. and E. M. Spevak. 2009. Population Analysis and Breeding Plan Mexican Wolf (*Canis lupus bailey*) Species Survival Plan, p. 8.

³ Mexican Wolf Experimental Population Area Initial Release and Translocation Proposal for 2019 (Sept. 30, 2018), p. 2.

⁴ 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.

The Service reported that in early August 2003, she was observed “feeding on a cow carcass in the Rainy Mesa area. WS determined it was not killed by a predator.”⁵ Subsequently, the Francisco Pack depredated on cattle in the same area and was destroyed less than two years later. Brunhilda’s mate lost a leg to a trap, and Brunhilda died of capture myopathy (panicked overheating and stress) less than a month after her capture in June 2005.

The Fish and Wildlife Service ignores scientific expertise in resisting common-sense management changes to prevent the conditions that led members of two wolf families in the past (Francisco and Saddle) to lose their freedoms and lives on Rainy Mesa and that recently may have played a role threatening the Prieto Pack and other nearby wolves. The 2001 Mexican Wolf Three-Year Review recommended “Requir[ing] livestock operators on public land to take some responsibility for carcass management/disposal to reduce the likelihood that wolves become habituated to feeding on livestock.”⁶ Likewise, in 2007 the American Society of Mammalogists advised the Service “to protect wolves from the consequences of scavenging on livestock carcasses.”⁷ But the Service has not done so. While mandatory carcass disposal is just one of several policy changes that will be necessary to reduce wolf/human conflict and increase genetic diversity, without this change other efforts may not suffice.

Please require that livestock owners remove or render inedible the carcasses of their domestic animals that die of non-wolf causes before they attract wolves to scavenge and then persist in proximity to vulnerable cattle.

In the meantime, pending the much-needed development of requirements for livestock carcass removal, please immediately cease all actions to remove Mexican gray wolves from the wild through trapping, aerial capture, or shooting. And please expeditiously release the two wolves already captured.

Thank you.

Sincerely endorsed by,

Karen Michael, Board Member
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⁵ Blue Range Wolf Reintroduction Area (BRWRA) Monthly Project Updates, Sept. 8, 2003.

⁶ Paquet, P. C., Vucetich, J., Phillips, M. L., and L. Vucetich. 2001. Mexican wolf recovery: three year program review and assessment. Prepared by the Conservation Breeding Specialist Group for the United States Fish and Wildlife Service, p. 67.

⁷ Reintroduction and conservation of the Mexican gray wolf, Eighty-seventh annual meeting of the American Society of Mammalogists. 2007. *Journal of Mammalogy*, 88(6):1574.

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