RE: Suspension of SOP 13 in Light of Loss of Mexican Gray Wolf Breeding Pairs and Failure to Achieve Reintroduction Goals

Dear Dr. Tuggle,

The undersigned 29 conservation, animal protection and educational organizations hereby request that the U.S. Fish and Wildlife Service and the other five agencies constituting the Mexican Wolf Adaptive Management Oversight Committee suspend application of SOP 13, the Mexican gray wolf predator-control protocol. Given the critical demographic and genetic plight of the reintroduced Mexican wolf population, it is reasonable and necessary to refrain, at least temporarily, from further removals of endangered Mexican wolves from the wild until reintroduction objectives for this population have been met.

SOP 13 is antithetical to the recovery goals of Section 10(j) of the Endangered Species Act, under which the reintroduced population of Mexican wolves has been designated. Section 10(j) requires that all management strategies further the “conservation of the species.” Instead of promoting conservation, SOP 13 prescribes a mechanistic, inflexible policy for capturing or killing Mexican wolves. SOP 13 affords no weight to the genetic value of the targeted animal, the social relationship of the implicated wolf to other pack members, the reproductive status of a wolf (including pregnant wolves), the temporal nature of the alleged infractions committed by a wolf (including the likelihood that depredations might cease), the number of wolves on the ground, the range or husbandry conditions – or lack thereof – attending loss of livestock, nor a host of other factors relevant to both recovery and adaptive management of the Mexican gray wolf.

The inherently punitive nature of SOP 13 has been aggravated by its application. For example, SOP 13, even before it was formally approved on April 7, 2005, served as the basis for the government shooting the alpha male of the Saddle Pack on July 11, 2004. This shooting proceeded under SOP 13 despite the fact that the Saddle Pack alpha male was known to be genetically irreplaceable, and had not preyed on cattle in almost three months prior to his death. The Saddle Pack alpha male had, in fact, been observed feeding on an elk in the interim.

On February 16, 2007, the alpha male of the San Mateo Pack was shot from the air due to three depredations, one of which, on March 15, 2006, pertained to a calf on a national forest area temporarily closed to livestock. In this instance, SOP 13’s requirement that depredations against only “lawfully present” stock be counted against a wolf was ignored in the interests of killing this wild-born wolf. Today, SOP 13 threatens to eliminate the remainder of the Saddle Pack, as well as the Durango Pack, and might...
even require the destruction of every extant breeding pair of Mexican wolves in the
course of this spring and summer.

SOP 13 is undermining Mexican gray wolf recovery and leading to irreversible
losses in the genetic heritage of a species that was reduced by a previous U.S. Fish and
Wildlife Service “control” program to just seven founding animals. We therefore request
that the Fish and Wildlife Service and other agencies immediately suspend enforcement
of SOP 13 until it achieves the reintroduction goal of at least 102 animals, including 18
breeding pairs. Although this goal was projected to be reached by the end of 2006, it
seems increasingly unlikely to ever be achieved under current management.

Thank you for your consideration.

Sincerely endorsed by:

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cc. John Morgart, U.S. Fish and Wildlife Service Mexican Wolf Recovery Coordinator; Terry B. Johnson, Arizona Game and Fish Department; Lisa Kirkpatrick, New Mexico Department of Game and Fish.