Arizona Office
738 N. 5th Ave, Suite 206
Tucson, AZ 85705
fax: (208) 475-4702
email: arizona@westernwatersheds.org
web site: www.westernwatersheds.org

Western Watersheds Project

Working to protect and restore Western Watersheds and Wildlife

August 22, 2023

Director Martha Williams
U.S. Fish and Wildlife Service
Department of the Interior
1849 C Street NW – MIB Room 3148
Washington, D.C. 20240
Martha_Williams@fws.gov

Regional Director Amy Lueders
U.S. Fish & Wildlife Service
Southwest Region
P.O. Box 1306
Albuquerque, NM 87103-1306
RDLueders@fws.gov

Brady McGee, Mexican Wolf Recovery Coordinator
U.S. Fish and Wildlife Services
2015 Osuna Road, N.E.
Albuquerque, New Mexico 87113
Brady_mcgee@fws.gov

Re: Mexico population of Mexican gray wolves

Dear Director Williams, Regional Director Lueders, and Dr. McGee,

Our organizations strongly support the recovery of endangered Mexican gray wolves (*Canis lupus baileyi*) in the United States and Mexico. Distressingly, their recovery in Mexico is badly faltering. Earlier this year, you indicated that there were approximately 20 wolves in Mexico, six with radio collars at the end of 2022, less the two collared wolves that had already died in 2023. At most, this indicated that Mexico had four collared wolves and, presuming (very optimistically) no new deceased uncollared wolves since then, a total of 18 wolves in the wild. This demonstrates that, 12 years after reintroduction begin in Mexico, the population there is not on track to timely reach the criteria of the Mexican Wolf Recovery Plan for delisting under the Endangered Species Act.

As most recently stated in the Mexican wolf 5-year review, the nonessentiality determination for the Mexican wolf 10j population is based, in part, "on the existence of a second wild population of Mexican wolves in Mexico."[1] Below, we present evidence that the review's conclusion that "No change is needed" for the species' classification is based in part on the flawed premise that the second wild population is stable.[2]

Additionally, as you know, the recovery plan's delisting criteria depend upon a strategy of the establishment of two resilient, genetically diverse Mexican wolf populations distributed in the U.S. and Mexico.[3] The FWS is relying on two wild populations of Mexican wolves to meet the concepts of resiliency, redundancy, and representation as measures of recovery. The recovery plan depends upon population growth in Mexico, "stimulated by the continued release of a substantial number of Mexican wolves from captivity to the wild, translocations, and population grown from natural reproduction increasing over time," to achieve resiliency. USFWS 2022 at 14. It depends on low levels of dispersal between U.S. and Mexico populations and translocations to achieve representation in the population. Ibid at 15. And the recovery plan explicitly states that two populations are necessary to meet the conservation principle of redundancy. Ibid at 12, 25.

Using the 2022 Mexican Wolf International Studbook, our analysis suggests that the average wild lifespan of wolves in Mexico (for whom death dates exist, as opposed to "lost to follow up") is 214 days (just shy of 7 months), but the median is only 78 days (2.5 months). Only 6 of the approximately 30 collared wolves for whom there is a "death date" have lived longer than one year.[4]

Based upon our review of the information, the only collared wolves that remained in the wild at the end of 2022 in Mexico[5] were affiliated with the X Anniversary Pack, the North Terraceño Pack, the Rose Pack, and La Avena. Collared animals from the Las Güeras Pack and the Poker Pack were subsequently killed by gunshot and poisoning, respectively. See Table 1.

[1] U.S. Fish and Wildlife Service. 2023. Mexican Wolf 5-year status review: Summary and Evaluation. Region 2, Albuquerque, New Mexico.

[2] The other part of the justification for retaining the "nonessential" classification relies on the capacity of the captive population to replace the US wild population should it fail. The captive population has supported recovery in the US and Mexico for the past 25 years, and achieving current recovery criteria remains a distant vision. The genetic integrity of the captive population continues to diminish over time as expected. The incoming genetic contribution of the initial 7 founders has eroded to a current founder equivalent of ~3 founders. The FWS admits that genetic improvement of the wild population becomes increasingly difficult as the population increases. The claim that the captive population is sufficient to replace the wild population, if necessary, is pure wishful thinking. The FWS has presented no scientific inquiry regarding the feasibility of replacing the entire US population from the existing captive population. Thus, the decision to retain the "nonessential" classification is unsupported by facts on the ground and credible science-based analyses.

[3] U.S. Fish and Wildlife Service. 2022. Mexican Wolf Recovery Plan, Second Revision. Region 2, Albuquerque, New Mexico, USA.

[4] We note that some of the wolves that are listed in the studbook as "Lost to Follow Up" are more likely deceased than alive. For example, M1336 is listed as LTF in the studbook, but his bloodied collar was found on December 3, 2021. He was in the wild in Mexico for less than two months.

[5] In this analysis, we excluded F1828, female of the Manada del Oro pack (a.k.a. the Arroyo Pack), because she has spent the majority of her time in the United States outside of Mexico for the past two years. Her mate, M1582 was killed in the U.S. in spring of 2023.

Table 1. Current collared individuals in the Mexican wolf population in Mexico.

Pack name	Collared Wolves	Associated wolves	Recent mortalities
Poker Pack	~~F1674.~~ ~~M1394, f2553~~[6]	Possible individuals without collars reported in 2023	F1674 and M1394 found dead March 3, 2023 (poisoning)
North Terraceño	F1633		Alive as of June 2023
Las Güeras	~~F1841~~		F1841 found dead March 14, 2023 (gunshot)
La Avena	M1215	Seen in April 2023 with an uncollared wolf	
Rose	M1695	Individuals without collars reported in 2023	1695 with documented movement until April 2023
X anniversary	F1323		No recent information

In addition, wolf pups were heard on several occasions on May 17, 2023 on the El Terraceño property near Casas Grandes but it is unclear which pack these were associated with.

Presumed to be still alive as of our sending of this letter are collared wolves F1633, M1215, M1695, and F1323. Each of these wolves is, at present, the sole collared representative of their pack.

- F1633 was born in May 2017 (6 years old);
- M1215 was born in May 2011 (12 years old);
- M1695 was born in April 2018 (5 years old); and
- F1323 was born in April 2013 (10 years old).

Of relevant concern is that M1215 has sired multiple packs with multiple females over the years; in fact, the only wild born wolves in the 2022 studbook are descended from him (F1448, F1449, and M1403). He sired pups with one of his daughters, F1448 in 2020 and 2021, and potentially in the preceding years as he was reported to have begun pairing with her in 2018. Any surviving pups in this pack from these years would have an inbreeding coefficient of 25 percent, a degree of relatedness that bodes poorly for the genetic diversity of this lineage.

The Service intends to complete a 5-year Status Review of the Recovery Plan and assess the status of each population's contribution to recovery. For Mexico, the interim abundance target by the end of 2022 was 100 wolves, and 25 released and translocated wolves surviving to breeding age. Ibid at 27. It is clearly not on track to meet these metrics.

Our current understanding of the Mexican wolf program in Mexico suggests that the Service's reliance upon it for recovery is misplaced and, again, we urge the Service to establish additional populations of

[6] F2553 may be being reported as 2533 in the Mexico reports. If so, a mortality signal on this wolf was received on April 23, 2022 but only the cut and bloodied collar was located, so she's listed in the studbook as "lost to follow up."

Mexican gray wolves elsewhere in the United States. The Service should revise the recovery plan to enable establishment of new populations in the Grand Canyon ecosystem and in the southern Rocky Mountains, where scientists have determined that wolves would thrive.

Again, we support Mexico's recovery of Mexican wolves, but it is not contributing to the legally-required U.S. recovery of the species at this time.

Sincerely,

Greta Anderson, Deputy Director
Western Watersheds Project
738 N 5th Ave, Suite 206
Tucson, Arizona 85705
greta@westernwatersheds.org

José C. Treviño
Environmental and Wildlife Consultant
01152 614 488 0087
Arquitectura 919
Universidad Magisterial 31200
Chihuahua, Chih. México
josectrevino@gmail.com

Michael J. Robinson, Senior Conservation Advocate
Center for Biological Diversity
P.O. Box 1727
Silver City, NM 88062
michaelr@biologicaldiversity.org

Erin Hunt, Managing Director
Lobos of the Southwest
c/o Wildlands Network
329 W. Pierpoint Ave, Suite 300
Salt Lake City, Utah 84101
erin@mexicanwolves.org

Maggie Howell, Executive Director
Wolf Conservation Center
7 Buck Run
South Salem, NY 10590
Maggie@nywolf.org

Renee Seacor, J.D., Carnivore Conservation Advocate
Project Coyote and The Rewilding Institute
PO Box 5007

Larkspur, CA 94977
rseacor@projectcoyote.org

Mary Katherine Ray, Wildlife Chair
Rio Grande Chapter Sierra Club
HC 30 Box 244
Winston, NM 87943
mkrscrim@gmail.com

Kirk C Robinson, Executive Director
Western Wildlife Conservancy
1021 Downington Ave.
Salt Lake City, Utah 84105
lynx@mission.com

Bryan Bird, Director Southwest Program
Defenders of Wildlife
210 Montezuma Ave., Suite 210
Santa Fe, NM 87501
BBird@defenders.org

Peter M. Ossorio & Jean C. Ossorio
5525 Lost Padre Mine Rd.
Las Cruces, NM 88011
peterossorio@centurylink.net

David Parsons, M.S., Carnivore Conservation Biologist
The Rewilding Institute
2723 Decker Ave NW
Albuquerque, NM 87107
ellobodave@gmail.com

Chris Smith, Southwest Wildlife Advocate
WildEarth Guardians
301 N. Guadalupe St, Suite 201
Santa Fe, NM 87501
csmith@wildearthguardians.org

Claire Musser, Executive Director
Grand Canyon Wolf Recovery Project
PO Box 233
Flagstaff, Arizona 86002
claire@gcwolfrecovery.org