

December 27, 2007

Brian Millsap
State Administrator
U.S. Fish and Wildlife Service
Ecological Services Field Office
2105 Osuna NE
Albuquerque, NM 87133

Fax (505)346-2542
Email: R2FWE_AL@fws.gov

RE: Notice of Scoping Meetings and intent to prepare an Environmental Impact Statement (EIS) and Socio-Economic Assessment for the Proposed Amendment of the Rule Experimental population of the Arizona and New Mexico Population of Gray Wolf, ("Mexican Gray Wolf").

Dear Mr. Millsap:

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- The current method of determining depredation does not adequately capture the true amount of harm and cost being done.
- Depredation on domestic pets on private, public or Tribal lands needs to be adequately addressed and effective remedies need to be available to protect private individuals.
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- A compensation and interdiction program managed by livestock producers themselves needs to be created to address the real cost of the losses individuals are experiencing.

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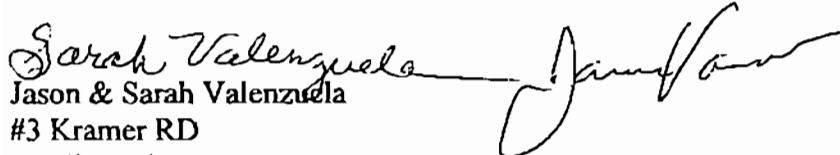
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USFWS-NMESFO

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- Research needs to be done on wolves by land grant universities that are unbiased and have the resources to do so.

Thank you in advance for your attention. We look forward to an EIS that addresses the real concerns, true costs and negative impacts to those rural communities that are within the program boundaries.

Sincerely,


Jason & Sarah Valenzuela
#3 Kramer RD
Sandia Park, NM 87047
(505)281-1918

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December 27, 2007

Mr. Brian Milsap
US Fish & Wildlife Service
New Mexico Ecological Services Field Office
2105 Osuna, NE
Albuquerque NM 87113

Dear Mr. Milsap:

We are neither ranchers, nor members of any "bio-diversity" group nor members of any organized effort to influence the future of the wolf program. We merely live in the national forest here and have closely observed the progress of the Mexican Wolf "recovery" project for the past eight years. During this time we have attended various hearings and information sessions on the matter, most recently a session in Glenwood, New Mexico earlier this month. At that session, we had extensive conversation with Mr. John Morgat, who was introduced to us as the recovery coordinator for this project in his role with US Fish & Wildlife Service (USFWS).

We asked many questions of Mr. Morgat about past and current essentials of this experimental wolf project and, although he was most polite and professional in responding to our inquiries, our experience was that his primary role at the meeting was wholeheartedly to support and defend the wolf program rather than to act as an impartial source of solid information. As experienced in other such situations and also with the 5 year review report, the information dispensed by your agency to the taxpayers is formulated and couched in terms that serve to hide and/or deflect negative aspects and outcomes of the experimental program to date. Consequently, such activities do not come across as a service to the taxpaying public but rather appear as self-serving propaganda issued by a government agency bent on defending and justifying its role and the continuance of a very questionable program.

Our carefully considered position regarding the "scoping" of the wolf program is that, as an experiment, it clearly has failed by every measurable means. The pre-stated expectations have not been fulfilled under those managing the program and some very damaging side effects have been documented. As a matter of fact, the damage and negative outcomes created by this program, at the expense of us as taxpayers, are much more clear and well-documented than the actually measured and documented outcomes of the program management plan. Upon studying the manner in which this "scoping" activity is being conducted, including the actions and positions of the involved government employees at this most recent session, one sees clearly that this "experiment" is not being addressed in a truly scientific manner in that the agency is not owning and reporting the essentially failed nature of the program. The above shortcomings and techniques are disappointing to us as taxpayers.

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. That is not the way science works – even the fuzzier aspects of biological science. Real science reports the findings clearly and accurately and lets them stand. If science wants a new and different experiment, it states its reasons and starts all over again. I am certain that you can see the picture that we see – this was a poorly conceived experiment which ineffectively estimated the outcomes in terms of wolf recovery as well as in damage to those affected by the wolf, and it appears that those who are running the program are trying to save it by making significant changes regarding rules and expectations. This is unacceptable.

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There are many critical needs to be served by government money, including the need to improve the lives and education of our citizens. There is never enough tax money to do the above. Instead, as with the wolf program, tax dollars are being spent to cause economic loss to a specific band of taxpayers, to cause grief for local citizens and increase costs and problems for their local government, and these losses being incurred in an effort to expand the numbers of an unneeded and unwanted animal that is just going to cause even more problems. When federal money is so greatly needed elsewhere, how can we justify spending such money to cause problems and grief?

Given all of the evidence available to date, and especially in consideration of the extensive financial cost to taxpayers, it is quite clear that the wolf program should honestly be identified as what it has become - an experiment that has failed - and it should be ended as soon as possible. Forget the demands of those special interest groups, the pressure tactics and the lobbying, and do what is right for the taxpaying public that provides your paycheck. Our scoping recommendation is that you do exactly that.

If your agency does not possess the basic courage and the common sense needed to do the correct thing by recommending and supporting the ending of the wolf program, and if you feel that you must persist in keeping the wolf program going, we then, as a poor second best effort, firmly recommend all of the following as pertaining to specific aspects of the scope of the program.

1. 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. Appropriately recognize and mitigate impacts to pastoral communities and individuals affected by introduced wolves.
2. Full investigation of the efficacy of livestock carcass removal including the increased cost to livestock operations.
3. Discontinue of the practice of trans-locating problem wolves.
4. Conduct prompt control, lethal and non-lethal, of problem wolves.
5. Improve monitoring of wolves to insure that residents in release areas are informed when wolves are in close proximity, and improve monitoring to facilitate documentation of predation on livestock.
6. 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. Specific language is needed to state a person may kill or injure a wolf if threatened by a wolf 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 demonstrates desensitization to human encounters.
7. Amend rule 10(J) to allow harassment or humane dispatching of wolves by federal, Tribal or state agencies when wolves exhibit fearless behavior or become habituated to humans and pose a demonstrable threat to human safety. This provision should include providing a federal take permit for local county law enforcement personnel to allow them to lethally take a wolf for immediate protection of human safety.

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8. Amend rule 10(J) to allow serious and affective methods to immediately stop wolf attacks on dogs and stop wolves from coming into private property and areas where people live. This should include public education practices that teach people how to deal with habituated wolves and give them the tools to do it. Also, arrange to issue take permits to those who are suffering these types of territorial challenges by Mexican wolves at their homes.

9. The 10(J) rule should document that people reside in current and potential wolf habitat. The general public has been given the mistaken impression that people do not reside in the wolf release and recovery areas.

10. Monitor livestock production in the release and recovery areas as well as the effects of wolves on watersheds, spread of disease and domestic and wild animal populations.

11. Create an allowance in the rule so that livestock owners or their agents may take (including kill or injure) any wolf engaged in the act of killing wounding or biting livestock on federally administered lands (see definition change) allotted for grazing anywhere within the Mexican Wolf Experimental population area, including within the designated wolf recovery areas.

12. Definition changes in the new rule and management plans and any SOPs as follow:
BREEDING PAIR: an adult male and an adult female that are firmly mated and have the potential to breed and raise a litter of pups in the upcoming breeding season

ACTIVE PACK: two (2) or more wolves that are attached to each other and exhibit pack behavioral characteristics.

DEPREDATION: the confirmed killing or wounding of a domestic animal by one (1) or more wolves.

INCIDENT: the killing or wounding of a domestic animal by one (1) or more wolves.

ENGAGED IN THE ACT OF KILLING, WOUNDING OR BITING LIVESTOCK: to be engaged in the act of grasping, biting, attacking, wounding, or feeding upon livestock that are alive or were alive within the past 24 hours.

LIVESTOCK: 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. Constitution).

PUBLIC LAND: lands available for dispersion into private ownership under general land laws to which no claim or rights of others has attached.

FEDERAL LAND: lands in which the United States retains a proprietary interest and prior claims and rights are attached.

TAKE: to harm, hunt, shoot, wound or kill.

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UNAVOIDABLE OR UNINTENTIONAL TAKE: take which occurs despite reasonable care and is incidental to an otherwise lawful activity, and is not done with purpose. Taking a wolf by trapping will be considered unavoidable or unintentional if the wolf is released and the capture is reported within 24 hours. Taking a wolf will be considered unavoidable or unintentional if the wolf is taken during a legal hunting activity, is non-negligent and is reported within 24 hours.

LEGALLY PRESENT LIVESTOCK: livestock occurring in the boundaries of a grazing allotment where the owner has beneficial use water rights on Federal land. (See federal land definition)

14. Retain definitions that do not warrant changes or additions from the current rule include the following:

Occupied Mexican Wolf Range, Opportunistic, Non-injurious harassment, Primary recovery zone, Problem wolves, Rendezvous site, Secondary recovery zone, Wolf recovery area. Specifically, the definition of problem wolf should not be gerrymandered to move the goalposts associated with management of problem behavior.

15. 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.

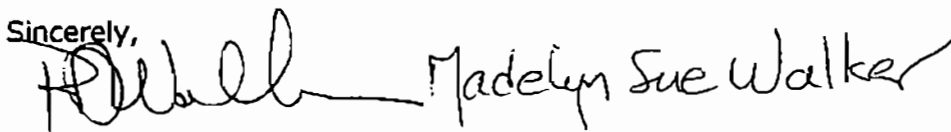
16. Implementation a federally funded pilot program aimed at compensation and interdiction to be run by ranching interests who are the experts in the field of livestock depredation causes and interdictions.

17. Change the current methodology for determining a depredation to the more reasonable Minnesota version which allows missing calves to be confirmed as wolf kills under certain circumstances.

18. Analyze and pursue the alternative of discontinuing the program, including the costs and benefits of the program thus far.

We appreciate your close attention to our comments.

Sincerely,

A handwritten signature in black ink, appearing to be "Paul D. and Madelyn Sue Walker". The signature is written in a cursive, flowing style.

Paul D. and Madelyn Sue Walker
P.O. Box 279
Quemado, NM
87829

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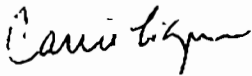
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Thank you in advance for your attention. We look forward to an EIS that addresses the real concerns, true costs and negative impacts to those rural communities that are within the program boundaries.

Sincerely,



Carrie Tigner
PO Box 786
Magdalena, NM 87825
(505)854-2781

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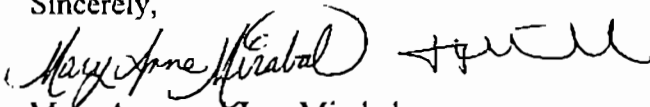
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A handwritten signature in cursive script, appearing to read "Mary Anne and Jory Mirabal", followed by a stylized flourish.

Mary Anne and Jory Mirabal

PO Box 1168

Magdalena, NM 87825

(505)854-3430

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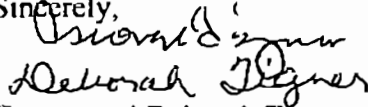
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Sincerely,


George and Deborah Tigner
PO Box 786
Magdalena, NM 87825
(505)854-2783

Comments on the present wolf program:

The wolf introduction was brought upon us by bad science and research. The following items describe bad science or no science at all.

1. U.S. Fish & Wildlife said there was plentiful prey in the deer herds. Everybody that lives in and around the release area knew there was no abundance of deer and the deer herds were in fact in a decline. People who live in the affected area, whether ranchers, outfitters, hunters, wood gathers, or hikers knew there was a shortage of deer. The comments by the people who were to become the most affected by the wolf release were ignored.

When the wolves started killing livestock, USF&W admitted that mistakes had been made about the deer prey base.

2. The USF&W then said that wolves will prey on elk. At this time the wolves had been enticed into New Mexico by feeding zoo-logs and road kill deer and elk. They had to admit that there were not enough deer or elk in the NM area west of the San Francisco River. Wolves were living on livestock. This brought up another great mistake, put the wolves in the Gila Wilderness where there is plenty of elk.

3. The USF&W said the wolves will stay in the Gila Wilderness. People in Catron County voiced their adamant opinion that wolves will not stay in the wilderness. Most of the Gila Wilderness has a sterile environment of wildlife. The area has been mismanaged by the Forest Service (FS) for over 100 years. In my personal trips throughout the wilderness, I witnessed an overgrown forest, there is dead and downed trees crisscrossing the forest floor at many locations. The past FS policy of putting out all fires has created a woody landscape that is set to be burned to a crisp.

The woody species have taken over the meadows and hillsides. The grass, browse and forb plants which sustain much of the wildlife, has been taken over by woody growth. Presently there have been enough fires and better feed conditions to sustain an elk herd in the wilderness.

Most of the wolves have left the wilderness, and are killing livestock on ranches adjacent to the wilderness. Another mistake by USF&W and their partners the extreme environmental groups (EEG).

4. The USF&W said they will introduce wild wolves. Wolves kept in small pens and fed zoo logs by humans are not wild. Wolves fed by humans once released are not wild wolves. Wolves that come to a pickup are not wild wolves. A friend of mine went with the pickup feeding wolves, "he asked, how do we find the wolves?" The answer, "wolves will hear the truck and come running". On many occasions wolves have chased trucks down the road for several miles. Wild wolves are supposed to run from humans. Habituated wolves are not wild wolves.

More false information given out by USF&W and their partners the EEG.

5. The USF&W said that all wolves had been exterminated in New Mexico and Arizona. USF&W had to prove this fact before releasing their captive wolves. People who had seen wolves were never contacted for their input. The areas reported to have true native wolves were never inspected.

USF&W never wanted to find any existing wolves. Their goal has always been to release the captive wolves.

6. The USF&W said it is rare for wolves to kill livestock, and they will not attack humans. There are books and historic writings to the contrary. Many western artists, known to be accurate in their painted accounts about the western frontier, have depicted wolves attacking animals and humans. Certainly there have been accounts in Germany and other countries about wolves preying on humans. In fact hundreds of humans have been killed by wolves, especially children. All of the accounts about prey on livestock and human attacks had been ignored.

USF&W now know that Mexican Gray Wolves kill or are capable of killing and eating anything that walks on the land.

7. The USF&W wrongly used the Endangered Species Act (ESA) to reintroduce wolves. Mexican gray wolves do not qualify as being endangered. They are the same wolf as the gray and the red wolf which is not endangered. This misuse of the ESA is just a ploy to satisfy the wolf lovers from USF&W and the EEG.

USF&W should not further benefit the wolf program under the wrongful use of the ESA, all wolves should be removed. They are not endangered.

8. The USF&W said wolves will prey on other wildlife and predation on domesticated animals will be at a scant minimum. Everybody including USF&W knew the history of wolves. They were removed from livestock country because their efficiency at killing livestock ruined any chance of surviving economically. Livestock owners in Catron County now face the same economic future, and several ranches have gone out of business. As the wolves increase, every rancher in their territory will have to sell out or face bankruptcy.

This evaluation by USF&W will have to face an economic analysis that will be accurate and not guess work and deceit as in the past. The known wolf predation on livestock alone is so unbearable that the wolf has to be removed.

9. The USF&W said that livestock owners who have livestock killed by wolves will be compensated. This program is a complete failure, for every cow kill there are 12 that have not been paid for. Beyond this 1 in 12 there are uncounted baby calves that are totally consumed and there is no record of this loss. A cow loss and loss of the future calves is far greater loss than is being compensated for.

Another colossal failure by the USF&W service, livestock kills have far surpassed the projected death loss.

10. 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.

Another colossal failure by USF&W, their plan to compensation for animal losses.

11. Another misconception by USF&W is that wolves do not kill for fun, they will only kill what they need to eat. Accurate accounts show that wolves in a pack will kill one cow after another and eat only the soft tissue. Accurate accounts show that multiple elk calves are killed and left on the forest floor. Many elk calves have no sign of consumption by the wolves. The USF&W have given false figures when determining wolf kills based on how much wolves eat. Wolves kill many more animals than they consume.

It is time for the USF&W to post accurate wolf kills abased on consumption and fun kills.

12. The USF&W evidently had no knowledge about habituated wolves. The possibility of having habituated wolves were never accounted for in the initial study to release wolves. Habituated non wild wolves pose the most danger to animals and humans close to the homestead.. Cattle, horses, sheep, chickens, dogs, and cats have been killed within yards of a residence. Habituated wolves historically have attacked and killed humans in other locations. Wolves are always looking for prey, the habituated wolf is no exception, they are always eying the possibility of their next kill. Written accounts of human kills have stated that habituated or older emancipated wolves are the most likely to attack a human. They will attack anything, being a human is no deterrent.

USF&W now knowing that older and habituated wolves are dangerous to humans should remove any wolves that fit this criteria. Any wolves habituated by human feeding in pens should never be turned loose they will never be wild wolves.

13. The cost of the program is staggering. There was no accounting of the total cost of this program in the beginning. The USF&W keep pouring money into a failed program. It is time to stop the funding and recognize that the wolf program is way beyond any accounting of the budget. Any future analysis of the wolf program should have a financial and time limit, we can use our resources in many more favorable areas.

It is wrong for USF&W to control their own funding when the funding goes into their own pockets. A government employee with a fat wallet is not so apt to care about his fellow humans.

Problems with the present program that should be addressed:

1. Press releases and interviews by personnel from USF&W are always pro wolf. USF&W being a government agency should operate their agency in a neutral sphere. Articles are always promoting the wolf program. The public is denied the true story about wolves killing for fun and killing everything they come across.
2. USF&W should quit feeding wolves, 9 years into the program and the wolves can't exist on their own. Documented accounts of any wildlife kept in captivity, bred and fed by humans for an extended period of time, have never been successful when returned to the wild.
3. Habituated wolves being a major problem should be removed from the program. Instead of removing the problem wolves, USF&W began a program of feeding wolves away from human dwellings. This is just a temporary fix and will not change the habituated habit of the wolf. The practice of feeding wolves has caused the killing of more animals for fun. Expending their energy to kill for a meal has been eliminated.
4. The study by New Mexico Fish and Game (NMGF) to determine if wolves have any effect on the elk herds existence. This study is somewhat flawed, NMGF studied broad areas of elk habitat and did not zero in on areas of heavy wolf populations. There is evidence from outfitters that elk in and around the Gila Wilderness has been depleted to a threatened existence status. Also this is a good grass year with plenty of rain, no consideration has been given for elk calf survival during a drought.
5. USF&W being 100% pro wolf are strictly catering to the Extreme Enviro crowd. This has gone on since the inception of the program. Letters sent to USF&W personnel by the Catron County Commission immediately turn up in the enviros hands. This branch of government being pro wolf is not neutral and decisions will always be contrary to good economic conditions.

6. There is the suggestion that dead cows will entices wolves to kill cows. Is everybody stupid, a wolf eating on a dead stinking cow, has no resemblance in smell or taste to a live cow. In fact my recollection of any dead animal, whether cow, elk, rabbit or coyote, the smell is just the same. I can't recall the time I ever smelled a dead deer carcass and had to rush home to have a deer steak. This requirement to have ranchers remove cow carcasses is a further notion to put ranchers out of business. It is a known fact that wolves will chase and kill whatever animal they come in contact with.

Wolves will eat any kind of meat, it has been documented that wolves will eat another wolf. What a majestic animal devouring their own kind.

7. USF&W and other agencies involved knew that there would be a problem of predation on livestock in the beginning. History of why the wolf was removed will tell us this. The fact that this agency and others being compatible with the Enviros treated private land different than National Forest Land. Enviros are anti livestock on forest land. A case in point, ranchers have no right to protect their livestock on federal land, whereas on private land they can kill wolves that threaten their livestock.

8. It has 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. These 2 countries had confiscated all the guns from the public, much the same as in California and other states that do not allow lion hunting. The wolves do not fear humans so humans become a source of food.

A by line of Enviros, never a human killed in North America. During the frontier days wolves were hunted for their pelt, killed and removed because of domesticated animal predation. It was necessary for early settlers to remove wolves and other predators for the survival of their animals and their own existence. In those days everyone had a gun and wolves being in short supply stayed away from humans.

Today because of wolf protection, there are thousands of wolves. These wolves have become habituated and older wolves are emaciated . Recorded deaths in North America are caused by older emaciated wolves or habituated wolves unafraid of humans.

This is the present worry in the Mexican Wolf recovery area, wolves frequent human dwellings and have challenged humans. It is just a matter of time before a human is attack or killed, probably a child. Enviros and federal people both scoff at the idea of a wolf killing a human. Much the same as the enviro that scoffed at the danger of the grizzly bear, so one went into their area and was devoured.

9. There is a need for the psychological and stress related illnesses caused by wolves to be assessed in the final analysis. Children have had trauma because of seeing wolves kill their pets, and the general knowledge of having an unafraid predator around their house.

In summary; The original study to reintroduce wolves was terribly flawed. The following items have to be addressed in the present evaluation to continue the program.

1. What is the prey base.
2. Consumption figures will include the fun killing by wolves on all animals.
3. All habituated wolves should be removed, they are not wild wolves.
4. All so called Mexican Gray Wolves should be removed, they do not qualify under the ESA as being endangered. The same wolf is plentiful as a gray or red wolf.
5. An analysis for the psychological and stress related illnesses caused by wolves.
6. Compensation program a failure, total compensation should be guaranteed by the Feds.
7. A true economic analysis is necessary, account for all animal losses and the projected damage to the county economy.

8. A true analysis of the future of hunting.
9. Cease the feeding of wolves, they have been here 9 years and should be on their own.
10. There needs to be a true right to protect livestock even on federal or state land.
11. Spend no more money on a failed program, it will always be a failure.
12. Cease to send out pro wolf information, you USF&W are a neutral agency.
13. Cease to turn out more habituated wolves.
14. USF&W it is your duty to inform the public correctly. Press releases should include studies done by Valerius Geist and others that document the danger of wolves to humans. Include the names and places where wolves have attacked or killed humans.

I have included a 28 page copy for the record of the studies done by Valerius Geist.

Submitted by Hugh B. McKeen
Rancher, Farmer, Animal lover, and Catron County Commissioner

My Address is H. C. 61, Box 175
Glenwood, N. Mex. 88039



December 29, 2007

VTA email

Brian Millsap, State Administrator
U.S. Fish & Wildlife Service
New Mexico Ecological Services Field Office
2105 Osuna NE
Albuquerque, NM 87113

RECEIVED

DEC 28 2007

USFWS-NMESFO

Mr. Brian Millsap, State Administrator

Dear Brian Millsap, State Administrator,

RULES & WOLF RANGE EXPANSION

Please let me give you my thoughts before going on to the subsequent rule changes.

I am totally against the wolf reintroduction plan, but do realize that there is nothing I can legally do to stop it. With that in mind, I would like to point out a few things that I do not believe you guys have covered well enough, in your wishes to expand the Wolf range to I-40.

With all the problems you are having with these Wolves in the Hecla, which is very sparsely settled, what makes you think you will get along better in the McKinley, Cibola County area, when it is one thousand times more settled? I cannot fathom how educated people like yourselves, would think that exposing these human handled Wolves to 1000 times the humans, and livestock, is going to make them less of a nuisance? I think that the problems are going to sky rocket off the boards.

All thru this range there are people living, way off the beaten path. Many of these folks are elderly Navajo, and Zuni people that have very small flocks of sheep, and very few cattle. I deal with these folks on a daily basis in my business, and can tell you first hand that if the Wolves take out their small flocks (even if they do get paid for them, which is also unlikely) they will never come back to the business. Then you have not only decimated a families way of living, but also intruded on a culture that is been going on for many, many years. As educated people, surely you have to partially understand the devastation these Wolves will bring to those folks the least able to defend themselves.

I believe that if this Wolf proposal were to be put on the ballot at a general election, in this area, it would be defeated by a landslide. But then again that would be the Democratic way of doing it, and we do not do things that way anymore. Whatever happened to a government for all the people, especially those that will have to live with these animals and contend with them on a daily basis?

Listed on the next page are my comments to the proposed rule changes in order. Thanks for you time.

Sincerely,



DB

Owner/ Gen Mgr
Cowtown Feed & Livestock

Db

cc: dudleybyerley@yahoo.com

- 2 -

December 31, 2007

- A. Full Cultural and Economic assessment of the value of wolves being allowed to expand their range. Let the general public on a county by county basis in affected areas, have a vote at their general election to see what the people of that area would really like.
- B. No captive wolf releases under any circumstances. Only wolves that are born in the wild should be allowed to re establish new territory. They would then be truly wild, and hopefully less of a problem.
- C. Why is White Sands Special, are you afraid one will get hit with a rocket? If we the people have to take our chances with wolves, should they not have to learn to live in the white sands environment, where there is other wild animals for them to eat besides livestock and family pets.
- D. Nuisance behavior, is different from depredation, and attack, and needs to be spelled out as such.
- E. We should have the legal means to harass nuisance wolves away from our homes and livestock and pets. Please keep in mind that many people in our county can not afford rubber bullets, and paintball guns, so those people need your help in finding a viable yet economical means of scaring these animals away for their property, thus keeping them wild and away from people as much as possible.

E. 1. Depredation should be dealt with in cooperation with county and federal authorities, if the animals are not caught in the act.

E. 2. Attack, is a whole different matter. Attacks need to be dealt with on the spot with lethal force, if at all possible, the same as with any intruder breaking into your house. People should have the right to protect their selves and their property regardless of the circumstances, same as with any person or animal trying to inflict bodily harm.

- F. A breeding pair is just that, a mated pair. Depredation and attack is covered above in e 1, and e 2.
- G. I do not really understand this one, but can see that all of that need to be covered in depth.

December 29, 2007

This is my comment to the U.S Fish and Wildlife Service, New Mexico Ecological Services Field Office, 2105 Osuna NE, Albuquerque, NM 87113, on the proposed rule changes for the reintroduction of Mexican gray wolves into Arizona and New Mexico, due by December 31, 2007. Copies of this comment are also being sent to various organizations and elected officials, along with some individuals.

Introduction

This statement is mine alone and should not be inferred to reflect the views of my church, my former employer (retired, but still associated with Los Alamos National Laboratory), or any other organization with which I may be associated.

The main body of this comment is divided into the two sections, "Context" and "Wolf Rule Changes." In "Wolf Rule Changes," issues that relate directly to the Mexican wolf recovery effort are discussed, however this section should be considered in the much broader framework of issues which currently face the U.S., as well as the rest of the world, as discussed in "Context." This comment is rather long; however it is focused on two main points. First, the mindset of the people, who continue to believe that the Earth has unlimited resources and nature is indestructible, needs to change. Second, the killing and trapping of Mexican wolves needs to stop.

Context

Section Introduction

Humans are accustomed to Earth providing for their every need, and most cultures have proceeded with reckless abandon to use everything Earth provides without much thought to possible future consequences. Granted, during the 1970s, the U.S. passed laws such as the Endangered Species Act, the Clean Air Act, the Clean Water Act, CAFÉ standards, and those establishing many wilderness areas. Rather than embracing these laws and the spirit behind these laws, most business interests, including corporations, farmers, ranchers, and others, have tried to either avoid following these laws or to completely rewrite or overturn these laws. This mind set of business as usual needs to change for the long-term benefit of everyone, including business itself.

It is often assumed and frequently stated that land, nature, and all other resources will always be provided, and whatever difficulties we might encounter, human ingenuity and technology will overcome. It is often argued that when people thought the population would outgrow the food supply, we learned how to grow much more food per acre. It is also argued that extremists complain about the lack of effort to preserve endangered species, but hardly anything ever seems to go completely extinct – maybe an occasional species and a few subspecies, but who cares. The list does not end there but continues with the following types of arguments. When we were running out of oil, we simply explored and found new reserves. In fact oil is not really any more expensive today, adjusted for inflation, than it was in the 1970s during the OPEC oil embargo. If we ever do run short of oil, the U.S. has enough coal to last us 200 to 300 years. Other minerals

seem to be plentiful with new reserves continually being found. In fact the prices of these minerals, adjusted for inflation, have continually decreased over the years. Technology and the standard of living continually improve with no end in sight.

Progress and Deadlines

I agree that technology and the standard of living continually improve, at least in the U.S. and many other countries, but these improvements have come at the expense of the environment and, at least in some instances and contrary to the opinion of some people, using up our resources. These improvements have also come about more in an opportunistic fashion or by being the next follow-on step to existing technology, rather than successfully being developed within an externally imposed time constraint in order to satisfy a pressing need. Examples include electricity, radio, television, telegraph, telephone, the light bulb, steam engine, internal combustion engine, train, the automobile, the airplane, the rocket, computers, and the internet --- the seemingly endless list goes on and on. All of these were soon found to be useful to the public, but there was no imperative to have any of them developed within a limited timeframe.

Another class of advancements in technology, which have no externally imposed time constraint, includes the need to overcome an undesirable phenomenon such as cancer or AIDS. Cancer has been with us for perhaps forever, but although progress is continually being made against this illness, there is still no projected date by when cancer will be conquered. AIDS is more recent than cancer, but progress toward conquering AIDS seems to be even slower than toward conquering cancer. No deadline has ever been set for conquering either cancer or AIDS, and if a deadline were to be set, it is doubtful that the deadline could be met.

Competition between two or more countries is another way technological development is stimulated. Two examples of this are the space race, especially the race to the moon, and the competition to develop advanced weapons during the Cold War, both being competition between the U.S. and the former Soviet Union. The arms race had no deadline. The goal was to be better than the other country, and both sides were constrained by the same limits in human ability. The race to the moon is a little different in that President Kennedy set the goal, in 1961, of putting a man on the moon by the end of the decade. This in a sense was a deadline, but not an externally imposed deadline, since President Kennedy probably consulted with NASA before announcing this goal and was told that it might be doable. This was more of an externally imposed deadline for the Soviet Union, which never did put a man on the moon. If the U.S. had failed to meet Kennedy's challenge, it would have been of little importance so long as the U.S. beat the Soviet Union to putting a man on the moon. It all came down to being the best in the competition between two countries.

Perhaps the best example of a race to accomplish a technological goal, within a limited but unknown length of time, was the race to build a nuclear weapon during WWII. Both the U.S. and Germany had the goal of building a nuclear weapon before the end of the war in order to end the war in their favor. The length of time was unknown because early in the war, nobody knew how long the war would last. The U.S. succeeded in building

two nuclear weapons before the end of the war, however by that time the outcome in Europe and with Japan had already been decided. The U.S. dropped both its bombs on Japan, which hastened the end of the war. Germany did not even come close to developing a nuclear weapon.

Based on this example, developing technology within an externally imposed time constraint is successful half the time and with marginal benefit. True, this is only one example, but it is the only example that comes to mind. Radar and sonar, as well as probably others, perhaps could put into this category, but I do not know enough about them to characterize their history.

Let us consider one more example before moving on. At one time it was thought that the human population of the Earth would surpass the Earth's capacity to feed this increasing population. At the time the problem was solved with increased mechanization and irrigation, as well as the use of massive quantities of chemical fertilizers, herbicides and pesticides. There is no doubt that the amount of food that can be produced per acre has increased drastically over the years, but this increase has come at a heavy price. This massive irrigation is pumping some aquifers, such as the Ogallala, dry and drying up some rivers, such as the Rio Grande. The aquifers are in danger of no longer being able to supply water, and the drying rivers are causing aquatic species to become endangered and destroying entire ecosystems along these rivers. The chemicals, in addition to creating problems locally, get washed by rain runoff into streams and rivers where they do damage sometimes hundreds of miles downstream. An example is the Mississippi River, which carries chemically contaminated runoff from Middle America, the breadbasket for much of the world, to the Gulf of Mexico. Here at the mouth of the Mississippi, this contaminated water has created a giant dead zone in the Gulf of Mexico. In order to solve an immediate problem, the need for more food, the solution has created new problems --- the scarcity of water and the destruction of an aquatic ecosystem.

Global Climate Change

Today we are faced with some major problems, which could very well have externally imposed time constraints. Perhaps worse is that before we realize there is even a deadline, the deadline may be only a few years in the future or have already passed. One such problem is global climate change. We have known since about the middle 1990s that global climate change is real, is caused by humans (mainly by burning fossil fuels which puts large quantities of carbon dioxide into the atmosphere, and to a lesser extent by other activities that put methane into the atmosphere), and could be a real problem sometimes in the future. The world led by the U.S., or perhaps better stated held back by the U.S., is doing very little about it.

Now conditions are being observed in the arctic that are starting to create positive feedback loops. The arctic ice cap is melting; instead of sunlight reflecting off the snow and ice and being reflected back into space, the sunlight is being absorbed by the ocean and is heating the water. The warmer the water gets, the warmer the Earth gets; the warmer the Earth gets, the more the arctic ice and snow melt; and the process continues to repeat itself in a positive feedback loop. The melting and subsequent receding of the

arctic icecap is causing more frozen tundra to be exposed. Once exposed, the tundra begins to melt due to the direct solar radiation (sunlight) and the increasingly warm atmosphere. As the tundra melts, trapped methane (a powerful greenhouse gas) is released into the atmosphere. Also, the warmer the atmosphere gets and the longer the process continues, the deeper the tundra thaws. Here again, a positive feedback loop is created. These are currently the two main positive feedback loops, but there are others that could become every bit as important, if not even more so.

There is evidence positive feedback loops contributed greatly to global climate change in the past. Ice core drilling samples from both Greenland and Antarctica, which gives data back over 400,000 years, show temperatures and carbon dioxide levels in the atmosphere varying in unison over 100,000year cycles. The lows and the highs of these cycles, for both temperature and carbon dioxide, are always at about the same levels. The temperature varies on the order of 20degrees Fahrenheit from lows to highs, and the carbon dioxide content of the atmosphere varies by about 100ppm (parts per million) --- 190ppm at the lows and 290ppm at the highs. (Before the start of the Industrial Revolution, we were at the high levels for both temperature and carbon dioxide. Since then the carbon dioxide content of the atmosphere has increased by about 90ppm, and we are now at about 380ppm.)

It has also been determined that the orbit of the Earth changes slightly, over 100,000year cycles, due to the gravitational interaction among the planets, mainly Jupiter. This 100,000year cycle in orbit change, and hence Earth's distance from the sun at different times in the year, correlates very well in time to the temperature and carbon dioxide cycles discussed above. The direction of change in different parts of the orbit is calculated to correlate in the right directions with the changes of the temperature and carbon dioxide levels in the data. The only problem is that the varying distances between the sun and the Earth is not nearly large enough to account for the huge differences seen in temperatures over the 100,000year cycle. It has been recognized that small changes in temperature could initiate positive feedback loops, which would greatly amplify these small temperature changes. Some of these feedback loops are coming into play today.

The date after which the present day positive feedback loops will continue to grow, no matter what humans do to try to stop them, is currently called the "tipping point." Current estimates are that the tipping point is ten years in the future if we continue burning fossil fuels in ever greater quantities as we have done in the past. It is interesting that it seems as though the people, who doubt the statements by climate change scientists that climate change is real and human caused, are the very people that take the ten years to be exact, stay relaxed, and believe we have plenty of time to fix whatever problem there may be. The exact date of this tipping point is uncertain, and the chance that we have already passed the tipping point is just as likely as the chance that the tipping point is much further in the future. Climate scientists apparently have just begun to seriously study this issue. It seems they have been spending most of their time trying to convince the U.S. government, many corporations, and many individuals that climate change is even a problem.

Once carbon dioxide is put into the atmosphere by burning fossil fuels, much of it remains in the atmosphere for several decades. The way to stop going past the tipping point is to immediately reduce the amount of carbon dioxide that is put into the atmosphere. This means reducing the amount of energy we use and/or changing our energy sources to something that does not put carbon dioxide into the atmosphere. (Also, the U.S. needs to move away from oil because we are probably at a time where global oil production in the future will steadily decrease, and oil has become a national security issue.) This brings us to a point similar to where we were near the beginning of WWII, having a real need to succeed within an externally imposed deadline. Then we felt we needed to develop a nuclear weapon before the end of the war. There are two interesting observations that should be noted. The first is that the U.S. government, many corporations, and many individuals are not taking the climate change problem seriously. Secondly, here again it seems that the people, who claim that technology, human ingenuity, and capitalism can solve any problem, are the very same people, who now claim that we do not have the means or even the knowledge to accomplish what is proposed, and even if we did try to do what is being proposed, it would wreck the economy.

A person should ask how hot the Earth might get. As a probable upper limit, Venus is about 900degrees Fahrenheit. Like Earth (even in pre-industrial times), Venus is heated by the greenhouse effect in the atmosphere. If the Earth had no atmosphere, the average temperature would be about 50degrees cooler than it is, hence a 50degree greenhouse effect. Venus has much more carbon dioxide in its atmosphere than Earth and has a greenhouse effect of several hundred degrees. There is probably not enough arctic ice to melt or enough methane to release that would heat the Earth to Venus-like temperatures, but these feedback loops can trigger others like the oceans becoming carbon dioxide emitters rather than absorbers when the waters get warm enough. Also, warming will change biological functioning, most importantly in the oceans, where changes related to plankton and other small life forms will probably have a huge effect on the levels of carbon dioxide in the atmosphere. Earth is 1.4 times as far from the sun as Venus, but when talking about hundreds of degrees, this small difference is of little consequence.

Is the Earth headed for 900degrees several centuries in the future? I do not know, but no one seems to be addressing the problem.

Global Ecosystem Collapse

Global climate change has been discussed much over the past two decades, but there is also another problem, possible global ecosystem collapse, that is probably every bit as important but has received very little attention. Ecosystems all over the Earth are in various stages of collapse. Parts of some originally vast ecosystems are still self functioning and are still largely intact. The Amazon Rainforest is such an ecosystem where, even though large areas have been heavily impacted by humans, large areas still remain mostly untouched. The Rio Grande with the Silvery Minnow is near the other extreme. The Rio Grande has been reduced to little more than a ditch where about half the native species are extinct, with the Silvery Minnow in danger of extinction. This minnow is hanging onto survival largely by artificial means, including an artificial, land

based breeding facility. In between are vast areas of the U.S. West that still exist in a semi-natural state, although heavily impacted by human activity. The oceans are in a similar state. Many small, local ecosystems have been totally destroyed by human activity.

Areas as seemingly vast and robust as the Amazon Rainforest could collapse. The almost daily rains are stimulated by the forest itself. The seemingly rich soil is only a few inches thick, with the plants in the rainforest tending to have shallow roots. Sufficient clearing of the rainforest will greatly reduce the frequency and amount of rainfall. This would cause what is now a lush forest to become arid. With the forest gone, the shallow topsoil would be carried away by runoff. In the extreme, what is now a rainforest could become desert.

As the naturally functioning ecosystems continue to collapse, humans are continually losing the robustness of their naturally provided life support system. As anyone, who has ever tried to restore an ecosystem or even a small area of nature, knows, once nature is decimated it is very difficult, if not impossible, to restore it to its natural condition. (In fact, sometimes it is best to just leave it alone, give it time, and let it restore itself.) The question then becomes how many ecosystems can be allowed to collapse, and how many ecosystems can be allowed to become greatly deteriorated, before the entire global ecosystem will collapse. The chance of global collapse is increased with global climate change, even if it turns out that climate change is relatively small.

The following is a question I have never heard seriously addressed: How far in the future might the global ecosystem collapse “tipping point” be? Reversing this collapse would be more difficult than arresting climate change. With climate change, we know the answer; we must drastically reduce the amount of greenhouse gasses emitted into the atmosphere, which means reducing the amount of energy we use and/or changing the way we produce energy. We probably have the knowledge or at least the capability to gain the knowledge to solve this problem if mankind only had the will to do it.

In the case of ecosystem collapse, the solution is not that simple. It is best to keep all functioning ecosystems intact and restore deteriorated ecosystems the best we can.

Drastic climate change generally happened over many hundreds, or even tens of thousands, of years, but during those times the Earth had a full complement of species entering these periods of change. Since the climate changed slowly, species were able to move, adapt, and evolve. Habitat was not all fragmented; hence species could move their range as climate conditions dictated. Of course there were barriers such as oceans for land species, land for ocean species, rivers, and mountain ranges that could present a problem to movement, but by and large the Earth was one continuous but varying habitat. Today we are looking at significant changes in temperatures, even if positive feedback loops do not become a major factor, over a time scale of 100 to 300 years. Many species, a large fraction of which are either threatened or endangered, live in small remnants of habitats, which are islands in a landscape that has been drastically altered by humans to

fit their own desires. Even if species had time to move their range, they could not because they are stuck in their island habitats.

To make matters worse, many of the species in island habitats and elsewhere today survive through intensive human involvement. Extensive human involvement in maintaining the survival of both habitat and species has become so prevalent that many people now believe that nature was never able to really take care of itself, and that nature is now so much better off that humans have come along to manage it. People tend to forget, or perhaps never knew, that the main reason many habitats and species now need human interaction is that humans have decimated them to the point where they are only a skeleton of their former selves. Protecting ill prepared humans from natural processes, such as fires in forests, is another need for human involvement with nature. Nature requiring human care is a bad situation. As discussed a little later, what we really need is the original, healthy situation where nature can take care of humans. What we have now are many endangered species that are sometimes referred to as the "living dead," which survive only under highly managed conditions in largely artificial habitats and have a much higher probability of going extinct in the foreseeable future than ever recovering to healthy numbers and living in a functioning ecosystem.

The philosophy of many people is to exploit nature until ecosystems collapse, or at least require human intervention, and species become threatened or endangered, or at least nearly so. They then push laws as far as possible to further pressure the species and their habitats, hoping to eliminate their problem by the species going extinct, all the time complaining how much effort is required to maintain these species and their habitat. Sometimes they do help the species just enough so the species will be taken off the endangered or threatened species list, and then resume exploiting the species and their habitat.

As an aside, I like to say --- The term "land and wildlife management" gives a person an exaggerated feeling of self importance, while at the same time, absolving everybody of the abuses they have committed against nature. Rather than managing nature, one must manage humans and the effects of humans in order that nature may thrive.

This whole mindset of managing species near the brink of extinction and ecosystems in various stages of collapse needs to change. Vast areas need to be allowed to recover to a continuous mosaic of varying ecosystems. Natural processes should be allowed to reestablish themselves over these vast, natural areas. Two examples of these natural processes are natural fires and flooding of streams and rivers. In these vast areas, many of the living dead would probably surprise us and return to healthy numbers. Perhaps more important than preventing species from going extinct, this would restore vast, healthy, continuously varying ecosystems. Without these healthy ecosystems, humans themselves could be at risk of going extinct, or at least experiencing a primitive or nearly primitive way of life.

In the West we are blessed with vast areas of land in a semi-natural condition. All that is needed by many of these grasslands, deserts, and mountains is a great reduction or even

elimination of human exploitation, reintroduction of native species, elimination of non-native species (where possible), natural processes, and time to become healthy, self sustaining ecosystems. The Mexican wolf could help bring this about.

Also, as a subspecies, the Mexican gray wolf, as with any subspecies or distinct population, must be preserved as a branch of evolution. The Mexican wolf will not evolve to any detectable extent over our lifetimes, but if this branch of evolution is ever terminated (extinction of the Mexican wolf), the Mexican wolf will no longer have the opportunity to evolve into a distinct species sometime in the distant future. With the current rate of extinctions on Earth, no chain of evolution should willingly be allowed to be broken.

The discussion above was written mainly in the context of the larger, more familiar species, which tend to be on the endangered and threatened lists. What generally tends to be overlooked is that it is not even known, to a factor of ten, how many species exist on Earth. While it is true that most of the larger species, such as mammals, birds, and trees, have been identified, the world of the small organisms has only superficially been catalogued.

These small species are very important since they are the basis of all life. They do such things as process the soil, decay dead plant and animal matter, be the bottom of the food chain both on land and in water, and live in symbiosis with the roots of many plants, without which many plants could not survive. These small species number in the unknown millions, with the vast majority never having been identified, much less ever having been put on any endangered species list. As larger species, with which they interact, go extinct and habitat is destroyed by human impact, large numbers of these small species are continually going extinct with hardly anyone even realizing that these extinctions are occurring.

These small species are the foundation for all higher forms of life, including humans. If these small organisms are no longer able to perform their functions in sufficient quantity, the atmosphere is no longer suitable due to excess greenhouse gas content, and the supply of water is greatly reduced due to depleted aquifers, as well as lack of rainfall over large regions caused by climate change and the deforestation of the rainforests, life for humans would be very difficult if not impossible.

If nature were no longer able to provide these basic needs for humans, humans would need to provide these functions by themselves --- that is if they were even possible to do. In any case, these functions would be very labor intensive and expensive without providing any additional benefit to humans other than continuing human survival.

In the past nature has provided for humans through depression, world wars, and a dark age (a severe intellectual and technological regression). During these times nature provided basic human needs while humans were preoccupied with other matters. If any of these problems occurred after humans started providing for these basic functions, the very existence of humankind could come into question. During a depression, there may

not be the money to fully operate all systems that provide all functions. During a war, these systems could be destroyed. Also, these systems could be threatened by terrorists, and these systems could be used by two countries in a form of Mutually Assured Destruction as nuclear weapons were used during the Cold War. During a dark age, people may simply forget how to maintain and operate these systems.

There is some evidence that past advanced cultures have declined due to environmental degradation and depleted resources. The collapse of the ancient culture along the Tigris and Euphrates Rivers, which may have been the Garden of Eden in the Bible and is located in what is now Iraq, is probably the oldest example. The Mayan and the Chaco Canyon advanced cultures probably ended for similar reasons. Back then when a culture declined, the people could fall back on nature to provide for their basic needs, especially if they moved to a different location.

Today human culture is global as are environmental degradation and excessive resource exploitation. If modern human culture depletes its natural resources and totally degrades the global environment, provided humans are not able to artificially provide all the basic functions that nature now provides, mankind will have no place to turn. Even if humans do reach such a dire point in the future, there is one consolation: Short of Venus-like conditions, all life on Earth will not go extinct.

Hubbert's Peak

We, the people on Earth, are using up the Earth's resources and destroying the life support systems provided by nature, which is our inheritance, without seriously planning for a sustainable future. It was acceptable to use some of the Earth's resources and take some of nature to develop a technologically advanced society, but now that we have developed such a society and are beginning to stress the Earth beyond its capacity to provide for us, it is time to change our ways. We are at a point in time when it is no longer wise to proceed with business as usual. The U.S. passed Hubbert's Peak (see references immediately below) for domestic oil production more than 30 years ago; we are at Hubbert's Peak for world oil production; the U.S. will reach Hubbert's Peak for domestic coal production well within this century; we are at or rapidly approaching the "tipping point" for human caused climate change, the time when no matter what humans do to correct the climate change problem, the climate will continue to change on its own; we are at the beginning stages of a mass extinction, with increasingly large numbers of species becoming endangered or extinct (whether or not they are officially listed as such); and entire ecosystems are in danger of collapse. (Two easily readable books of high quality on Hubbert's Curve are --- "Hubbert's Peak: the Impending World Oil Shortage," c2001, and "Beyond Oil: the View from Hubbert's Peak," c2005, both by Kenneth S. Deffeyes.)

Dr. M. King Hubbert, a Shell geophysicist, predicted in 1949 that U.S. domestic oil production would peak in 1970 and decline thereafter. We now know that annual domestic oil production peaked about 1973. Hubbert's Curve, which is followed very closely by the total domestic oil production data, is shaped very much like the standard Bell Curve, rising to a peak over time and then symmetrically declining. The shape of

Hubbert's Curve is defined by a mathematical equation that models, as a function of time, the production rate of a finite resource, where demand for this resource is continually growing. The maximum production rate depicted by Hubbert's Curve is called Hubbert's Peak.

All of Earth's geologic, natural resources must be finite because the Earth is a sphere of finite volume, and these resources are no longer being created. None of our natural resources come close to filling the Earth, but they all must be finite even if their total quantity is very large. Also, the demand for U.S. domestic oil continues to grow, along with global demand for all fossil fuels.

Today the annual domestic oil production is only a fraction of what it was in 1973, and there is no realistic chance that annual domestic oil production ever again will equal the 1973 peak. Even if domestic oil production were expanded to include all Alaskan and offshore oil, annual domestic production would never come close to again equaling the 1973 peak. Hubbert's Curve for global oil production predicts a maximum global oil production rate early in the first decade of the 21st century, which means we are now at or a little past Hubbert's Peak for global oil production.

It is often stated that the U.S. has enough domestic coal to last 200 or 300 years, at the current rate of usage. The phrase "at the current rate of usage" is generally overlooked, and one assumes we have 200 to 300 years of coal. This of course does not take into account the continual growth in coal usage and the probable increased demand for coal as global oil production decreases. Factoring in some reasonable growth, Hubbert's Peak for domestic coal is less than 80 years in the future, within the likely lifespan of my young grandchildren.

It is sometimes pointed out that the cost of many minerals is continually getting less expensive when adjusted for inflation. This observation is used to reinforce a belief that new supplies of any resource will always be found as long one looks for them. I maintain that this is the wrong conclusion and that all these resources are finite and they are just following the early part of a Hubbert's Curve. At some time, perhaps in the distant future, the production rates of each of these resources will reach a maximum.

It now seems reasonable to ask the question as to whether Earth's global ecosystem is also following a Hubbert's Curve. The global ecosystem is finite, and we seem to be using and destroying it at an ever increasing rate. Intuitively it seems to me that it should, but I do not know the answer. However, this is something worth considering. There is one difference between fossil fuels and ecosystems that could make Hubbert's Curve inapplicable to ecosystems. At least to some extent, ecosystems can be restored. (On a similar note, many natural resources are recyclable, and rather than using fossil fuels, energy can be produced by renewable sources.)

Section Conclusion

For a person to use an inheritance to establish a business to sustain oneself is good, but one who spends the inheritance lavishly on oneself, which is what we are doing, will

never experience a good outcome. Another way to look at this is that over the years we have built up an enormous environmental debt that we must begin to pay back to the Earth.

We have had just enough success to make the arrogant among us believe that we can solve any problem on any time scale, but we do not seem able to solve the relatively simple problems such as preventing cattle from being killed by wolves, much less the problems of massive climate change, extinction of species, and a dwindling fossil fuel supply, all of which loom in the future.

Let us now consider the Mexican wolf recovery effort in light of this broad framework.

Wolf Rule Changes

Section Introduction

The most important immediate need for the recovery of the Mexican wolf is to stop killing and trapping these wolves. The second most important need is to greatly increase the area where the wolves are allowed to freely roam. The best way to accomplish both these goals is to work to change the mindset of people. When the vast majority of people, including the very vocal minority that currently oppose wolves, learn to accept wolves roaming the countryside and being part of nature, then it will be easy to allow wolves to roam freely almost anywhere. I now give an example of a similar situation that applies to us in Los Alamos.

In 2000, the Cerro Grande fire shocked the Los Alamos community and destroyed a good number of houses. At first, all people saw was the devastation, and all they felt was anger at the fire and the people who set the prescribed fire and then let the fire get out of control. Over time the mindset of the people is changing.

We have had three forest fires in the Los Alamos area --- La Mesa fire in 1977, the Dome fire in the early 1990s, and the Cerro Grande fire, the only one of these fires to destroy any houses or other buildings in or around town. Looking at these three burned areas today, we see that the countryside has benefited from these burns rather than being devastated. We are coming to realize that forest fires, even wildfires, are good. They are only a problem when they burn down buildings.

We are realizing that the solution is not to put out all fires, but to greatly reduce the probability that a building will burn. The term generally used for this is "defensible space." This includes selecting proper materials in construction, especially the roof. Fortunately, the roof is the most important part of the building to consider, and most roofs need to be replaced periodically anyway. Additionally, one must consider what is immediately around the building, such as trees, shrubs, woodpiles, etc. All of these changes are not happening overnight in Los Alamos, but they are definitely happening, and the mindset is definitely, but slowly, changing. In California the defensible space residential areas that exist have proven to be very effective against wildfires.

We must work to have a similar change in mindset with regard to wolves. We as a people must accept and learn to live with nature rather than continually trying to conquer nature and mold it to satisfy our selfish desires.

Data Analysis

As stated above, the most important immediate need for the recovery of the Mexican wolf is to stop both the legal and illegal killing, as well as trapping, of these wolves. The following discussion will come to that conclusion. The data used in this discussion was obtained from either the website mexicanwolfeis.org or John Slown, Mexican Wolf Planner, both of the U.S. Fish & Wildlife Service. This data is given in Table 1 and Table 2. The last three columns in Table 1 are quantities I have added.

Table 1

Data and simple analysis pertaining to the Mexican wolf population in the Blue Range Wolf Recovery Area. After the "Year" column, the next five columns are from the U.S. Fish & Wildlife Service. The last three columns pertain to my simple analysis. All terms in this table are defined in the text. Data for 2007 is preliminary and incomplete.

Year (Y)	Proj. N (PN)	Est. N (EN)	Initial Rel. (IR)	Mortality (M)	Perm. Remove (PR)	Loss (L=M+PR)	Net Intro. (NI=IR-L)	Net Gain (NG=EN(Y)-EN(Y-1)-NI)
1998	7	4	13	5	2	7	6	-2
1999	14	15	21	3	0	3	18	-7
2000	23	22	16	4	4	8	8	-1
1998 Thru 2000		(22-0 =22)	(50)	(12)	(6)	(18)	(32)	(-10)
2001	35	36	15	9	1	10	5	9
2002	45	42	9	3	3	6	3	3
2003	55	55	8	12	1	13	-5	18
2001 Thru 2003		(55-22 =33)	(32)	(24)	(5)	(29)	(3)	(30)
2004	68	44-48	5	3	1	4	1	-10
2005	83	35-39	0	4	5	9	-9	0
2006	102	59	4	6	8	14	-10	32
2004 Thru 2006		(59-55 =4)	(9)	(13)	(14)	(27)	(-18)	(22)
1998 Thru 2006		[59-0 =59]	{91}	{49}	{25}	{74}	{17}	{42}
2007	---	---	0	4	7	11	-11	---
1998 Thru 2007		---	{91}	{53}	{32}	{85}	{6}	---

Inserted here is a note about the availability of the data in these two tables. Even though I found some of this data buried in a report on mexicanwolfeis.org and John Slown was very helpful in supplying other data, the data is incomplete (as seen in Table 2) and not

readily accessible to the public. This data, and perhaps also other data, should be placed in an easy to find location on mexicanwolfeis.org or some other website. It would be informative to also present the data as number of wolves removed by human means, such as legal and illegal shooting and trapping, and number of wolves removed by natural means, such as disease, sickness, accident, and snake bite. Vehicle collision probably should count as a natural means since these collisions are rarely intentional, and vehicle collision has become an everyday risk for animals in the wild. Separating natural wolf deaths from human related deaths and other removals would be most helpful since it would differentiate between the wolf's ability to adapt to surviving in the wild from human's ability to learn to coexist with wolves. In addition to the number of cattle killed by wolves, the data should also include cattle deaths by sickness and disease, accident, mountain lion, bear, and unknown, along with the number of cattle simply unaccounted for. It would also be very informative to give the approximate number of cattle considered to be at risk to wolf predation. We now return to the main discussion.

Table 2

Number of livestock and dogs confirmed (Conf.), probable (Prob.), or possible (Poss.) killed by Mexican wolves in the Blue Range Wolf Recovery Area. No data was available for 2004 through 2007. (This table is taken from "Mexican Wolf Blue Range Reintroduction Project 5-Year Review: Technical Component")

Year	Cattle Conf.	Cattle Prob.	Cattle Poss.	Max. No. Cattle	Dog Conf.	Sheep Conf.	Horse Poss.
1998	0	0	0	0	1	0	0
1999	5	0	4	9	0	0	0
2000	1	0	2	3	0	1	0
2001	5	0	3	8	0	0	0
2002	9	0	0	9	1	0	0
2003	3	4	1	8	0	1	1
2004	---	---	---	---	---	---	---
2005	---	---	---	---	---	---	---
2006	---	---	---	---	---	---	---
2007	--	---	---	---	---	---	---
Total	23	4	10	37	2	2	1

An "Estimated Wolf Number" (population), see column 3 in Table 1, is obtained at the end of each year, and these numbers are then compared with "Projected Wolf Numbers" (column 2), which were predicted before the first wolf releases in 1998. For the first 6 years, 1998 through 2003, inclusively, the Estimated Wolf Numbers followed the Projected Wolf Numbers very closely, and in 2003, the Estimated Wolf Number equaled the Projected Wolf Number of 55. To this point the recovery was advancing as predicted. Then starting in 2004 and continuing through 2006 (the 2007 wolf census has not yet been done), something went wrong. The Estimated Wolf Numbers declined in the next two years, reaching a low of between 35 and 39 wolves in 2005, and then rebounding some to reach an Estimated Wolf Number of 59 in 2006, 43 wolves short of the Projected Wolf Number of 102 and just 4 wolves above the previous high of 55 wolves in 2003. One should determine where the problem lies and then fix it. (Because there is such a large fluctuation in the Estimated Wolf Numbers for the years 2004, 2005, and 2006, perhaps the uncertainty in these numbers is larger than indicated in the table.)

Before going further, defining terms is in order. "Permanent Removals" (column 6) refers to all management-related removals, typically shooting or trapping. "Mortalities" (column 5) refers to all known deaths of wolves other than management-related lethal removals, and includes illegal shooting, vehicle collision, natural causes and unknown. According to a Dec. 23, 2007, **Albuquerque Journal** editorial, 26 wolves have been poached since the recovery program began in 1998. If this is true, approximately half of all Mortalities have been due to these illegal shootings. "Initial Releases" (column 4) are releases of wolves that have never been released before into the wild. These terms and definitions are from John Slown. In addition, I will define "Loss" (column 7) to be the sum of mortalities and permanent removals. I will also define "Net Introduced" (column 8) to be Initial Releases minus Loss and "Net Gain" (column 9) to be the Estimated Wolf Number minus Net Introduced. Net Gain is an indicator of how well the wolves are reproducing in the wild.

An analysis of the data begins by noticing that the data divides nicely into three equal time blocks of three years each. The year 2007 is not included since the data is preliminary and incomplete. For the first three years, 1998 through 2000, the Estimated and Projected Wolf Numbers follow each other very closely, but the net gain is negative, indicating that some wolves are missing or in some other way not counted in the Estimated Wolf Numbers. It is not surprising that the Net Gain is not positive since the newly introduced wolves had not yet started to breed, at least not to any appreciable extent. For the next three years, 2001 through 2003, the Estimated and Projected Wolf Numbers still follow each other very nicely, and now the Net Gain is positive (indicating successful breeding) and averaging 10wolves/year. For the last three years, 2004 through 2006, the Estimated Wolf Numbers falls behind the Projected Wolf Numbers and probably remains rather constant at the 2003 level. The total Net Gain for this three year block is still positive and averaging about 7wolves/year, which is only a little less than the 10 wolves/year in the previous time block. In 2004 the Net Gain is a negative 10, which means that some wolves were not counted in the Estimated Wolf Number or were missing in some other way. (Since in 2004 and 2005 a range is given for the Estimated Wolf Number, the average of each range is used in this analysis --- 46 in 2004 and 37 in 2005.) In order for the Net Gain not to be negative in 2005, the Estimated Wolf Number in 2005 would likewise need to be larger. In 2006 the Estimated Wolf Number increased to 59, with a seemingly unrealistically large Net Gain of 32. So unless the population of 59 is artificially high due to double counting of wolves in the 2006 estimate, the wolf population remained about constant over the 2003 to 2006 time interval at about 50 or 60 wolves, with an average Net Gain in the 2004 to 2006 time interval of about 7wolves/year.

The Initial Releases show a block to block decrease over time with the numbers being 50, 32 and 9, respectively. This decrease maybe was planned at the outset of the reintroduction program. Except for the earliest time block when the wolf population was small, Losses have remained about constant with 29 in the 2001 through 2003 time block and 27 in the 2004 through 2006 time block. In the first block the Initial Release of 50 was much greater than the Loss of 18 for a Net Introduced of 32. Even though the

wolves did not reproduce (at least to any appreciable extent) as indicated by Net Gain not being positive, the Estimated Wolf Number grew due to the large Net Introduced. In the second block the Initial Release of 32 was about equal to the Loss of 29 for a Net Introduced of only 3. By now the wolves were successfully breeding and had a Net Gain of 30, which largely accounted for the increase in Estimated Wolf Number from 22 in 2000 to 55 in 2003. In the third block the Initial Release of 9 was much less than the Loss of 27 for a Net Introduced of a negative 18. The wolves were still breeding almost as successfully as in the second block with a Net Gain of 22. This Net Gain of 22 was just barely able to offset the Net Introduced of negative 18 for an almost constant but a slight increase of 4 in Estimated Wolf Number from 2003 to 2006.

This simple analysis implies that either Initial Releases must be increased or Losses must be decreased, otherwise the wolf population will decline or, at best, remain about constant. According to the non-final numbers available for 2007, Initial Release was still zero, and Loss already stood at 11 for a Net Introduced of negative 11. Assuming that the wolves continue to breed at the rate of 7wolves/year, one can expect a decrease in Estimated Wolf Number of 4 in 2007. Assuming that the number of poached wolves of 26 is correct and Mortality of 53 and Permanent Removal of 32 are not too far out of date, the number of wolf deaths due to natural causes and unintentional deaths caused by humans, such as vehicle collision, is only 27 (53-26) over the entire length of the Mexican Wolf Recovery Program. By comparison, the number of intentional wolf deaths and other removals by humans is 58 (26+32). Said another way, 2/3 of all wolf deaths and removals are intentional by humans, while only 1/3 are by other causes. Probably without exception, these intentional deaths and other removals were initiated by ranchers.

Increasing the number of Initial Releases in order to increase the wild population does not seem practical because it is pointless to release captive bred wolves into the wild only to be shot. The only sensible solution is to greatly reduce, or ideally stop, the shooting and other intentional removal of wolves.

Wolves Absent Grazing

The best way to resolve the conflict between wolves and ranchers is to buy out grazing leases on public lands from willing sellers. Once bought out, none of these grazing leases should ever be reissued to the original lease owner or anyone else. In the past, bills have been proposed in Congress and the environmental community is currently raising money to buy out grazing leases. Every effort should be made to see that these efforts succeed. This by itself could go a long way toward solving the problem.

Buying out leases would be beneficial to not just the wolves, but the land and the people as well. Cattle do a great deal of damage to the land, streams, and vegetation. With removal of the cattle, the ecosystem would recover. We are all aware of how the reintroduction of wolves made the Yellowstone ecosystem flourish in many pleasantly surprising ways. The same thing could happen in New Mexico and Arizona if the cattle were removed and the wolves were allowed to thrive. With cattle still on the land, it is doubtful that the Mexican wolf recovery area will see the same degree of improvement as Yellowstone. Yellowstone has buffalo, but buffalo behave differently than cattle.

Many of these ranches are marginal operations from a financial standpoint. Perhaps it would even be monetarily beneficial for most ranchers to go into some other business or employment. Even though it is uncertain what these new lines of work might be (I will offer a couple of ideas), this is an area that should be given much serious thought and discussion. (Perhaps it is of interest that, as the amount of effort required on nuclear weapons research and maintenance decreases, Los Alamos National Laboratory is resisting change and experiencing similar pains to the transition from being largely a nuclear weapons laboratory to a laboratory having a much larger component of energy research. This is a transition that will almost surely come. The inertia to change is clearly recognized, but in most cases it must be overcome.) Many of the old ranchers will probably never change, but the younger ranchers and the younger heirs of the older ranchers are probably open to, and actually looking for, a more profitable way of life so long as they do not need to sell the piece of private land they do own. Workable options for such a new way of life should be made available to them.

Since with the new way of life, the private land probably will not qualify for the agricultural tax rate under the current property tax laws, the state and local governments should find ways for the tax to stay the same on these places, or else many of these places could be subdivided to the detriment of the area. Every effort should be made to keep this land low habitation density and under a single owner.

As we begin the 21st century, the world is becoming increasingly connected, especially through various forms of communication, such as the telephone system and the world wide computer network. Also, we will move to an interconnected and flexible electrical grid where the roofs of buildings will be electricity generating solar panels. The solar panels will not only generate electricity to be used on site, but, as moment to moment conditions dictate, excess energy will be fed into the grid and needed energy will be taken from the grid. Of course, solar panels are not limited to roofs. Solar panels, wind turbines, and perhaps other kinds of electricity generating devices could be placed in various locations throughout the private land under discussion. Although here one should be mindful to place the generating stations only on pieces of land that are already impacted by human activity and not on pieces of land that are still in a natural or semi-natural condition. Also, the power lines for this grid should run along existing roads or existing easements that already contain humanly constructed infrastructure.

Anymore whenever one calls a 1-800 number, especially for technical computer assistance, one is likely to be connected to someone in either India or the Philippines. As worldwide communications become increasingly interconnected, opportunities for increased numbers of distant and even remote site sources of information and expertise will arise in not just the field of computers but also in many different areas. These calls could be directed to what is now private ranchland.

These two ideas may or may not work, but it seems that no one has, in good faith, seriously addressed the problem. It is past time that serious thought be given to this problem with the intent of finding a solution that is advantageous to not only humans, but

the environment as well. Since this area is 95% publicly owned, much of which is still in at least a semi-natural state, this area is ripe to be transformed into a healthy ecosystem and a more profitable way of life for the people, so long as the problem is addressed with the right mindset.

Wolves Alongside Glazing

If some people insist on continuing to ranch in the area (as they almost certainly will, at least in the short-term), then we must: 1) learn what works to keep domestic animals, especially livestock, from being killed by wolves and also learn how people can keep wolves from being a problem around residences, and 2) work to change people's mindset against wolves and work to make people realize that the wolves are there to stay, hence it is to everyone's advantage to adhere to what is learned in 1). Similar steps are being taken with regard to fires.

Bears are another example where the problem was determined to be due to the actions of humans and not the bears themselves. It was determined that bears were attracted to readily accessible food. The simple solution was to keep all food inaccessible to bears in all locations. Examples of accessible food for bears include garbage dumps and bins, campgrounds, picnic areas, and residences (unsecured sheds, garbage, ripe fruit on and under fruit trees, excess birdseed, etc.). Making such food sources inaccessible to bears is strictly enforced in Yellowstone National Park, where this common sense approach has proven to be very effective. Some neighborhoods adjacent to forests have ordinances against practices that attract bears, and violators are being cited. These ordinances are also proving effective.

Violations of rules and laws regarding wolves, especially poaching, should be treated more seriously (with intensive investigation, apprehension, and punishment) than violations against non-predator game such as deer and elk. Violations of rules and laws regarding wolves can create problem wolves that can be a danger to not only domestic animals, but more importantly to humans. People must realize their actions can result in future harm to either themselves or others. We cannot allow people, through their actions, to create problem wolves and then demand that those wolves be trapped or killed.

The techniques to prevent problem bears and to coexist with fires have been determined and seem to work well where they are applied. On the other hand, techniques to prevent problem wolves do not seem to be as well established.

Since dogs seem to attract wolves, it must be determined how dogs should be handled to reduce their attraction to wolves. As has been done with bears, laws should be made and then enforced requiring the correct handling of dogs, especially around residences. It is strange that probably the people who complain that wolves are dangerous are probably the same people who are most careless with dogs. This last statement is just a guess.

Another problem is how to prevent cattle and other livestock from occasionally being killed by wolves. The belief is that wolves learn to kill cattle by first eating from a dead cow that was either killed by another species of animal such as a mountain lion or bear or

died due to illness or disease. There seem to be two theories as to how the wolf takes the next step to actually killing cattle. One is that the wolf develops a taste for beef. The other theory is that a dead cow tends to be near a herd of cattle, and after being attracted to the dead cow, the wolf starts to kill live cattle since they are handy. Hence to prevent wolves from learning to kill cattle, the recommended solution is to either remove the dead cow or render it inedible by applying some substance such as lime. Ranchers resist doing this, sometimes probably just to be stubborn, but also hunting for dead cattle must be time consuming and there is no guarantee that all dead cattle will be found. Once a dead cow is found, it should be a simple matter to apply lime. Removing a dead cow, especially one that is more than a day or so old, must be difficult and nasty work. However if it is known to a reasonable level of certainty that removing dead cattle or rendering them inedible prevents wolves from learning to kill cattle, then ranchers must either expend the effort or lose their grazing lease on public land. Even on private land owners do not have absolute power. A person must obey laws even on his own land. A person must obey laws even if the laws add to business expenses or even completely take away income. An example is where a legal house of prostitution is forced to close because of a change in the law. The owner and workers are not reimbursed for lost earnings or wages.

It is also observed that cattle in the Great Lakes region are very rarely killed by wolves. These cattle are probably checked on almost daily, and any dead cattle quickly removed. On the other hand, it may be these cattle are more docile than the cattle in Arizona and New Mexico. Any sudden, rapid movement can trigger the chase response in any predator, including the wolf. Perhaps the cattle in the Great Lakes region are less likely to be killed by wolves simply because they are more docile.

Mexican wolves in Arizona and New Mexico have been found to kill more cattle than gray wolves, which have been reintroduced in the more northern part of the U.S. It is theorized that this difference is due to the fact that the more northern cattle are only on the range for part of the year, whereas the Mexican wolf lives alongside cattle year-round.

It would be helpful if one could determine with a high degree of confidence why cattle are killed by Mexican wolves and how to prevent these killings. There have been at least four possible reasons advanced as to why cattle are killed by Mexican wolves --- 1) Mexican wolves are exposed to cattle year-round, 2) evasive actions by range cattle trigger the chase response in Mexican wolves, 3) Mexican wolves start by eating a dead cow, develop a taste for beef, and then start killing cattle, and 4) Mexican wolves start by eating a dead cow, and since there is often a herd of cattle in the vicinity of a dead cow, wolves then progress to killing cattle because they are handy. I propose an experimental process by which three of these four theories, and possibly others, could be checked. This experimental process is probably time consuming and expensive, but something needs to be done to more accurately and confidently understand the interaction between cattle and wolves. If it is determined that this process is impractical to implement and/or will not yield the sought information, other methods should be devised to obtain this knowledge.

This experimental process is based on an A-B comparison, which involves two enclosures of many acres each. One would release a similar number (as well as age, sex, etc) of wolves into each enclosure, submit the wolves in the two enclosures to the same conditions except for the condition being tested, and compare the response of the two 'packs' of wolves. (I hesitate to use the word 'pack' since there may only be one or two wolves in each pen.) Ideally the wolves would be in the enclosures with only live prey, such a deer, elk, etc., to eat. Like any experiment, especially an experiment of a scaled down system, one must be very careful both in planning the experiment and in analyzing the results. After each experiment, one would probably need to start with two new packs of wolves for the next experiment since a wolf cannot erase its memory.

To test the third theory (dead cow, taste for beef, live cow), one would let the wolves and a continuous supply prey live in each enclosure for a time, and then a dead cow treated with lime would be placed in one enclosure and an untreated dead cow placed in the other enclosure. Later, one would release a live cow into each enclosure. The responses of the wolves to both the dead cows and the live cows are observed and analyzed.

The fourth theory (dead cow, nearness to cattle) is probably not testable by this method since wolves would always be relatively near a cow anywhere in the enclosure. In fact if nearness to cattle is what prompts wolves to kill cattle, this suggested experimental setup may not be very useful.

To test the first theory (year-round vs. short-term), put a cow in one enclosure for a long period of time and put a cow in the other enclosure for shorter periods of time, and then compare the results. To test the fourth theory (docile vs. evasive cow), put a cow in one enclosure that will show little reaction to the presence of wolves and in the other enclosure put a cow that will take evasive measures in the presence of wolves, and then compare the results.

When it is learned to a reasonable degree of certainty how to prevent wolves from killing cattle, rules must be adopted and enforced that require ranchers to follow these methods on both public and private land. Violators must suffer consequences such as losing their grazing leases on public land.

One should consider ranchers setting up their own cooperative insurance against livestock predation by wolves. Defenders of Wildlife, an environmental organization, reimburses ranchers for livestock lost due to confirmed wolf predation, but this gives no incentive for ranchers to practice wolf-friendly ranching. Since the number of cattle killed per year (less than 10) compared to the total number of cattle at risk to wolf predation is small, the premiums would be small for each rancher. This last statement is based what I assume to be a minimum number of cattle in the area and on the number of cattle killed by wolves given in Table 2 and on the mexicanwolf.org website. The mexicanwolfeis.org website states that there have been about 70 probable and confirmed depredations or livestock injuries since 1998. Combining the total of 70 with Table 2, we see the predation rate is about 10cattle/year. It is my understanding that there are about

150 ranchers at risk to wolves, each of which probably has at least 100 head of cattle for a minimum total of 15,000 head of cattle. This means less than one tenth of one percent of the cattle per year are killed by wolves, which seems like a small number. The actual percentage is probably much less.

A cooperative insurance would have two advantages. First, if the same rancher is repeatedly collecting on the insurance, he is probably practicing poor ranching, and in order to keep their annual premiums as low as possible, the other ranchers would encourage him to utilize better ranching methods. One might argue that this unfortunate rancher could have a "cattle killing wolf" in his grazing area, but since, with probably rare exception, a wolf pack's territory would be larger than the area grazed by any one rancher, it seems that other ranchers would be having problems with the same wolf. Secondly, people are very ingenious and resourceful. With the right incentive, the cooperative of ranchers will probably develop a pool of knowledge, through insight as well as trial and error, as to what attracts wolves to kill cattle and what does not.

Section Conclusion

Most of this comment takes a long-term approach, but in the short-term the Mexican wolf is in trouble due to the excessive human killing and trapping of wolves, hence something must be done in the short-term to allow the Mexican wolf population to grow. Since wolves reproducing in the wild will not be able to keep up with the current rate of legal and illegal human removal of wolves, human removal must be greatly reduced immediately. Poaching must be vigorously investigated and prosecuted. Encourage Defenders of Wildlife to continue reimbursing for confirmed wolf kills, but make this reimbursement contingent upon what is believed at the time to be wolf-friendly ranching practices, for instance putting lime on dead cows. If requested, the U.S. Fish and Wildlife Service should supply the lime, at least until it is determined to a reasonable degree of certainty what methods are genuinely effective against wolves preying on livestock. Modify the three strikes rule such that it is used on a case by case basis. For instance, if an affected rancher is not using what is considered wolf-friendly ranching practices, the strike would not count. Ranchers must be given some incentive to cooperate in the effort to determine how to keep cattle from being killed by wolves.

I realize that the U.S Fish and Wildlife Service tries to be even handed to both wolves and ranchers, but in recent years the pendulum has swung way toward the ranchers. The U.S. Fish and Wildlife Service must start putting much more importance on the well being of the wolves, or else they are not doing their jobs.

Conclusion

People tend to emphasize minor short-term problems (or even inconveniences) over long-term problems, even though the long-term problems may be devastating. This is even if the cost to remedy the short-term problem is small compared to overcoming the long-term problem, assuming the long-term problem is even possible to overcome. Reestablishing the Mexican wolf in the Southwest may not be by itself absolutely essential, but it is an integral part of the list of things that need to be done to transition the U.S. into the 21st century. Reestablishing the Mexican wolf is not only necessary for the

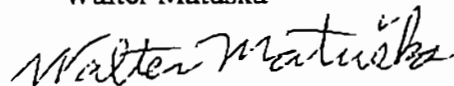
environmental health of the Southwest, but by assuming a leadership role as the wealthiest nation on Earth, the U.S. will set an example for the rest of the world, especially the much poorer, developing countries.

It seems obvious to me, and many other people, that the only thing keeping the wolf recovery program from succeeding with ease is the trapping and shooting of wolves, by both U.S. Fish and Wildlife Service agents and outlaw individuals. This shooting and trapping of wolves must stop!! One must work with ranchers and other locals to keep livestock from being killed by wolves and to keep houses from being frequented by wolves. This is for the benefit of the wolves as well as the people. If on public lands, which comprise 95% of the Primary and Secondary Recovery Zones, ranchers do not use methods that are known to a reasonable degree of certainty to keep cattle from being killed by wolves, take away the ranchers' grazing permits. Public lands are owned equally by everyone in the U.S., and the wishes of a few ranchers cannot be allowed to override the good of the country. The buying out of grazing rights on public lands should also be an option. Even on private land the owner does not have absolute power. The range where the Mexican wolf is allowed to roam freely must also eventually be expanded.

The ranchers have been taking advantage of the U.S. Fish and Wildlife Service and demanding that more and more wolves be killed or trapped. Something needs to be done to regain control of the Mexican Wolf Recovery Program because pandering to the ranchers has gotten completely out of hand.

Ignoring long-term problems, especially as relates to the environment, is a mindset. Some environmental problems, such as drastic climate change and global ecosystem collapse, could drive the human species to extinction. Overcoming minor short-term problems relating to the reintroduction of Mexican wolves will go a long way to overcoming this mindset to the benefit of everyone. The bottom line to the Mexican Wolf Recovery Program is: The Mexican wolf seems perfectly capable of recovering its population; it is only the counterproductive behavior of some humans that is jeopardizing this recovery program.

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Brian Milsap, State Administrator
US Fish & Wildlife Service
New Mexico Ecological Services Field Office
2105 Osuna, NE
Albuquerque NM 87113

RECEIVED

DEC 29 2007

USFWS-NMESFO

Fax: (505) 346-2542

Re: Notice of Scoping Meetings & Intent To Prepare Environmental Impact Statement & Socio-Economic Assessment for the Proposed Amendment of the Rule Establishing a Nonessential Experimental Population of the Arizona & New Mexico Population of the Gray Wolf ("Mexican Gray Wolf")

Dear Mr. Milsap:

Thank you for the opportunity to offer scoping comments on the above captioned rule.

We believe that the following issues should be included in the scope of analysis:

- * Full disclosure of the social, cultural and economic impacts on rural residents and local governments, including: The loss of tax revenue and increased costs to local government due to presence of introduced wolves; appropriate recognition and mitigation of impacts to small, rural communities and individuals affected by introduced wolves.

- * Full investigation into the efficacy of livestock carcass removal, including the costs to livestock operators.

- * Discontinuance of the practice of translocating problem wolves.

- * Prompt control, lethal and non-lethal, of problem wolves.

- * Improve monitoring of wolves to insure that residents in the release areas are informed when wolves are in close proximity and to facilitate documentation of predation on livestock.

- * Amendment to the 10(J) rule that includes the authority to harass Mexican wolves for purposes of scaring them away from people, buildings, facilities, pets and livestock. Specific language needed that states a person may kill or injure a wolf if threatened by a wolf 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/or has demonstrated desensitization to human encounters.

- * Amendment of the 10(J) rule that allows harassing or humanely dispatching wolves by federal, Tribal or state agencies when wolves exhibit fearless behavior or become habituated to humans and/or pose a demonstrable threat to human safety. This provision should include providing a federal take permit for local county law enforcement personnel to allow them to lethally take a wolf for immediate protection of human safety.

- * Amendment of the 10(J) rule that allows serious and affective methods that will immediately stop wolf attacks on dogs and from coming onto private property and in areas where people live. This should include public education that teaches people how to deal with habituated wolves and gives them the tools they need to protect themselves. Also necessary is the need to issue take permits to those who are suffering these types of territorial challenges by Mexican wolves at their homes.

- * The 10(J) rule should document that people reside in current and potential wolf habitat. The general public has been given the mistaken impression that people do not reside in the wolf release and recovery areas.

- * Recognition and maintenance of livestock production in the release and recovery area.
- * The effects of wolves on watersheds as well as the spread of disease in domestic and wild animal populations from unvaccinated, uncollared wolves.
- * Amend the 10(J) rule by allowing livestock owners, or their agents, to take (including killing or injuring) any wolf engaged in the act of killing, wounding or biting livestock on federally administered lands (see definition change).
- * Change definitions in the new rule and management plans; as well as any SOPs, to include:
 - * BREEDING PAIR: an adult male and an adult female that are firmly mated and have the potential to breed and raise a litter of pups in the upcoming breeding season
 - * ACTIVE PACK: two (2) or more wolves that are attached to each other and exhibit pack behavioral characteristics.
 - * DEPREDATION: the confirmed killing or wounding of a domestic animal by one (1) or more wolves.
 - * INCIDENT: the killing or wounding of a domestic animal by one (1) or more wolves.
 - * ENGAGED IN THE ACT OF KILLING, WOUNDING OR BITING LIVESTOCK: to be engaged in the act of grasping, biting, attacking, wounding, or feeding upon livestock that are alive or were alive within the past 24 hours.
 - * LIVESTOCK: any animal routinely contributing to the ability of a small businessman to sustain themselves, including but not limited to cattle; horses; goats; burros; llamas; chickens; stock dogs; guard dogs; hunting dogs and/or other domestic animals to which a value is attached and the loss of which would be a financial hardship and result in the takings of private property (pursuant to the Fifth Amendment of the U.S. Constitution).
 - * PUBLIC LAND: lands available for dispersion into private ownership under general land laws to which no claim or rights of others has been attached.
 - * FEDERAL LAND: lands in which the United States retains a proprietary interest and prior claims and rights are attached.
 - * TAKE: to harm, hunt, shoot, wound or kill.
 - * UNAVOIDABLE OR UNINTENTIONAL TAKE: a take which occurs despite reasonable care and is incidental to an otherwise lawful activity, and is not done with purpose. Taking a wolf by trapping will be considered unavoidable or unintentional if the wolf is released and the capture is reported within 24 hours. Taking a wolf will be considered unavoidable or unintentional if the wolf is taken during a legal hunting activity, is non-negligent and is reported within 24 hours.
 - * LEGALLY PRESENT LIVESTOCK: should be defined as livestock occurring in the boundaries of a grazing allotment where the owner has beneficial use of water rights on Federal land. (See federal land definition)
- * Retain definitions that do not warrant changes or additions from the current rule, including the following:
 - * Occupied Mexican Wolf Range, Opportunistic, Non-injurious harassment, Primary recovery zone, Problem wolves, Rendezvous site, Secondary recovery zone, Wolf recovery area. Specifically, the definition of problem wolf should not be gerrymandered to move the goalposts associated with management of problem behavior.
- * 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.

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* Change the current methodology for determining a depredation to the more reasonable Minnesota version which allows missing calves to be confirmed as wolf kills under certain circumstances.

* Analyzing the alternative of discontinuing the program, including the costs and benefits of the program thus far.

Thank you for your time and attention to this matter.

Sincerely,



Murray and Judy Keeler
PO Box 307
Animas, NM 88020

RECEIVED

DEC 29 2007

USFWS-NMESFO

To: New Mexico Ecological Services Field Office

Attn: Brian Millsap

From: Charles Clayton & Muriel deGanahl

Date: December 29, 2007

Number of Pages including Cover Sheet: 3

Comments: Please accept these comments regarding the potential modifications establishing nonessential experimental populations of the Mexican Gray Wolf in Arizona and New Mexico.

December 28, 2007

Mr. Brian Millsap
State Administrator
U.S. Fish and Wildlife Service
New Mexico Ecological Services Field Office
2105 Osuna NE
Albuquerque, NM 87113

Re: Potential Modifications of Rule Establishing Nonessential Experimental Populations of "Mexican Gray Wolf" in Arizona and New Mexico

Dear Mr. Millsap:

We live and work in Chavez County, New Mexico, and have recently been made aware of the fact that public comments are being accepted in relation to future modification of the rule establishing experimental Mexican gray wolf populations in Arizona and New Mexico. We have concerns regarding expansion of the program, and they are as follows.

It is apparently the desire of the Federal Fish and Wildlife Service to expand the existing recovery area from the Blue Range Wolf Recovery Area to other parts of New Mexico as well as redefining the boundaries of the White Sands Wolf Recovery Area due to insufficiency of size and prey density. We strongly object to expansion of these recovery areas. 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. Habituated wolves in the original recovery area and repeated depredation incidents require the frequent removal of nuisance and problem wolves, indicating that similar problems could be expected in any new areas that are created. 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.

It is also the desire of the Fish and Wildlife Service not to be required remove wolves for boundary violations when they establish territories outside of recovery areas. We feel that this removal requirement is an important part of the wolf recovery program, and eliminating the requirement will be detrimental to successful livestock production in the state. Public support for the wolf

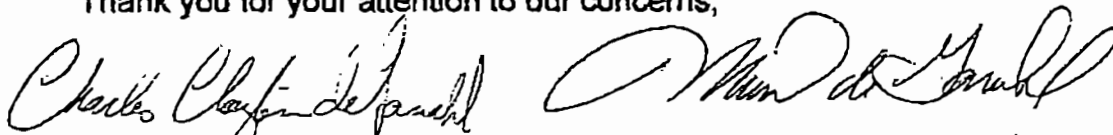
reintroduction effort was largely based on the federal government's willingness to limit the geographical scope of the project. Wolves that establish territories outside of the recovery areas are more likely to be near homes, schools, pastures and livestock, and will not only detrimentally impact our rural economy, but will have a negative effect on health and public safety as well. Perhaps instead of changing the rules at this juncture, the Fish and Wildlife Service should adjust its goals in relation to total desired wolf numbers at this time, based on their experience in New Mexico thus far.

Other miscellaneous items of importance to us that relate to the program in general and appear to be topics for discussion at this time include our desire to see an expansion of practical provisions for "harassment" of problem wolves and more liberal opportunities for "taking" of wolves who are threatening livestock, pets, or family members, particularly on private property. Current requirements regarding multiple documented depredation incidents prior to removal of problem wolves seem ridiculous to any casual observer. 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. If the Fish and Wildlife Service truly wants this program to succeed, it will be necessary to provide practical solutions for those whose lives and are impacted by the program.

We would appreciate being added to any mailing list you may have regarding information about future meetings on this topic, as we were unaware of the recent scoping meetings until they were already completed. We feel that the meetings themselves were poorly advertised, and the locations inconvenient (there were no meetings within 100 miles of our home). Had the scoping meetings been properly advertised and the public made aware of the intentions of the federal government, public outcry against expansion of this program would have been loud and clear.

The federal Fish and Wildlife Service indicates that they have, "learned many lessons...since establishing the program". We would hope that the biggest lesson learned would be in their failure to contain and control those wolves already in the program. Multiplying these problems by introducing wolves into additional pastures and back yards in New Mexico would be reckless and is unacceptable.

Thank you for your attention to our concerns,



Charles Clayton and Muriel deGanahl
PO Box 1498
Roswell, NM 88202

Stella Montoya
1592 Hwy 170
La Plata, NM 87418

December 29, 2007

Brian Milsap
State Administrator, US Fish & Wildlife Service
New Mexico Ecological Services Field Office
2105 Osuna, NE
Albuquerque NM 87113

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3. Discontinuance of the practice of translocating problem wolves.
4. Prompt control, lethal and non-lethal, of problem wolves.
5. Improve monitoring of wolves to insure that residents of the release areas are informed when wolves are in close proximity and to facilitate documentation of predation on livestock.
6. Amending the 10(J) rule to include the authority to harass Mexican wolves for purposes of scaring them away from people, buildings, facilities, pets and livestock. Specific language is needed to state a person may kill or injure a wolf if threatened by a wolf 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 demonstrates desensitization to human encounters.
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12. An allowance in the rule for livestock owners or their agents may take (including kill or injure) any wolf engaged in the act of killing wounding or biting livestock on federally administered lands (see definition change) allotted for grazing anywhere within the Mexican wolf Experimental population area, including within the designated wolf recovery areas.

13. The need for definition changes in the new rule and management plans as well as any SOPs, such as:

BREEDING PAIR: an adult male and an adult female that are firmly mated and have the potential to breed and raise a litter of pups in the upcoming breeding season

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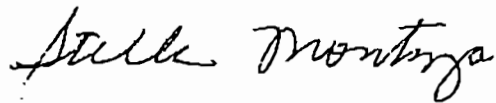
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17. Change the current methodology for determining a depredation to the more reasonable Minnesota version which allows missing calves to be confirmed as wolf kills under certain circumstances.

18. Analyzing the alternative of discontinuing the program, including the costs and benefits of the program thus far.

Sincerely,

A handwritten signature in cursive script, appearing to read "Steve Montoya". The signature is written in black ink on a white background. Below the signature, there is a faint horizontal line, possibly a separator or a scanning artifact.

RECEIVED

Dec 29 2007

USFWS-NMESFO

Moon Ranch
Charlie & Pat Judd
HC 61 Box 110
Buckhorn, New Mexico
88025
575-535-2288

To: U.S Fish & Wildlife Service

Re: Suggestion and comments on the Mexican Wolf Reintroduction Program

Commenter: Charlie & Pat Judd
Moon Ranch
HC 61 Box 110
Buckhorn, New Mexico
88025
moonranch@starband.net

Basis for Comments: One of the largest deeded land holders in Grant County and USFS
Grazing Allotment permit tee on the Gila National Forest.

Suggestions are:

Give people the right to protect their personal and private property from any threat to any livestock, dogs, cats, chickens, and etc. That is supposed to be a constitutional right. I can not believe it has gone this far that a wolf can walk through my yard by my grandson and his pup and I have no recourse to do anything. we cannot wait till someone is hurt to resolve this one.

Where there is a dog or a cat there are going to be people, and kids. The wolves need to be conditioned that people are not what they want to hang around, we need to harass them every chance we get when they enter our space. Maybe after a while they will start to get wild and stay away from homes and animals associated with people. Instead of doing nothing we all should teach wolves that it is not acceptable to be around humans or livestock (dogs, cats, chickens, etc.)

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 now. I do not want there status to be changed I think they are a non-essential to anything, I don't know why we are even trying this. I have nothing against the wolves I just believe you are going at this wrong.

When a wolf starts killing livestock you need to remove him permanently from the area. He will only teach the other wolves to do the same thing. Believe me I have been around enough dogs and coyotes in my lifetime to know what I am talking about. Once a wolf learns to kill he will never change and will only teach the others how to kill. If the wolf people are keeping a lineage on these wolves they are not even wild wolves we need to quit giving them shots, collaring, and feeding them. The less we handle them the better. If you will just release them and teach them people are not ok. I think you might eventually have some wild wolves that will learn to survive.

I believe you should compensate the Ranchers for loss of any livestock. And remove the wolves permanently from any area not to be released again in the wild, just keep him in a zoo and if he cannot be trapped kill him.

There is no way a wolf can eat the carcass of a cow and then decide it will kill a cow later. They did not kill it they have no idea what it is. It is just food to them.

Have somebody on call 24/7 that the public can get a hold of to address a wolf problem and be able to take care of it immediately.

I wish the U.S. Fish & Wildlife Service would listen to the people who know the country the wildlife situation and the impact these wolves will make on the countryside. Most of them have been born and raised in the area they should know more about this country and what it can sustain then the Defenders of Wildlife, Forest Guardians and other such groups.

I suggest you find an area where there are less people like white sands missile range, an area that is already restricted from the public entering. There is a lot of military area's you can turn them loose on where there would not be human contact to worry about.

I have nothing against the wolves, but I look at all the homeless people and old people that cannot afford medical care and we are spending all this time and money on a non-essential pack of wolves and causing hardship on the people who live in the area.

I really think the U.S. Fish and Wildlife Service needs to use a lot more good old common sense on how you are going about this.

I would appreciate if you will send me a reply showing you received this letter so I know it ended up in your office before the 31st.

Thank you for your consideration of and attention to these comments.

Submitted by Patricia Judd on December 29, 2007 by E-mail and Fax.

December 2, 2007

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Brian Milsap
State Administrator, US Fish & Wildlife Service
New Mexico Ecological Services Field Office
2105 Osuna, NE
Albuquerque NM 87113

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USFWS-NM&SFO

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Sincerely,



Mr. and Mrs. E. D. Gillespie
Reserve, New Mexico

Dripping Springs Ranch
P. O. Box 30
Mule Creek, NM 88051
575.535.2515

December 30, 2007

To: Brian Millsap, State Administrator, U. S. Fish and Wildlife Service
New Mexico Ecological Services Field Office
2105 Osuna, NE
Albuquerque, New Mexico 87113

RECEIVED

DEC 30 2007

Re: Mexican Gray Wolf NEPA Scoping

USFWS-NMESFO

Sent via: E-mail & Facsimile

Comments by: Jerold & Heidi Collings
160 Brushy Mountain Road
P.O. Box 30
Mule Creek, NM 88051
575.535.2505
jmilliron@starband.net

Basis for Comments:

Large private landholdings and USFS Grazing Allotments on the Gila National Forest, Mule Creek, NM

Privately own and operate largest known conservation breeding program of endangered strain of Wilbur/Cruce Colonial Spanish Horses.

Personal Comment

As people whose lives have been profoundly affected by the wolf reintroduction program, the most difficult part of preparing and submitting the USFW Service requested comments regarding changes to the rules governing the project, is forcing ourselves to maintain a positive attitude. As usual, a good many of the changes being evaluated strongly suggest that we locals can expect that important aspects of our rural way of life will continue to be sacrificed at the bloody altar of the sacred wolf.

Overview:

Proponents of the wolf program appear to expect the released wolves to behave as something they are not, and perhaps cannot be again – wild! At fault is reliance upon prerelease studies of truly wild wolves that were expected to predict the behavior of the habituated wolves designated for release into the Primary Recovery Zone. The result of this flawed research is that expectations for the program are not now being met. Supporters of the program are not pleased with current results. Worse, the unfortunate few humans who happen to live within the Recovery Areas, have been subjected to what amounts to a federally imposed form of terrorism that has shattered lives and harmed rural economies.

Local Support

It has been expressed that the Fish and Wildlife Service has been somewhat surprised and disappointed in the lack of support shown by the local populace within the Recovery Areas. Please understand that while we are not necessarily against the wolf, we do feel victimized by the manner in which the reintroduction has been thus far handled. The sacrifices demanded by this program have been disproportionately placed upon our doorstep. It is our lives that have been adversely impacted on what has become an almost daily basis. Our livestock has been killed and mutilated; our working dogs and pets drug off our porches and eaten; our properties left devalued (and in some cases virtually unsaleable); and our children left in fear for their lives. We have been given little or no compensation for the depredation that has occurred, even though such depredation is much greater than was predicted when the prerelease data was originally presented to us. We are disallowed by law from protecting our livestock in any effective manner, and are expected to allow our animals to be savagely attacked and caught by federally protected predators. We have heard no discussion concerning just compensation for our losses in property value as a result of wolves depredating on our ranches. (I know of no one who is looking to buy a ranch for the express purpose of feeding wolves.)

If we are offered, what has been touted as an opportunity for our complaints to be heard, we are typically treated as one would treat a whining child and sent home with nothing more to show for our efforts to be heard than a few store bought cookies and a pat on the head. It is as though we are being publicly shamed for not fully recognizing and appreciating what a fine gift these wolves really are. In effect we are told, "You good ol' boys just head right on back to old home place and cowboy up."

Additionally, some members of our local communities have been unfairly targeted by overzealous enforcement agents of the U.S. Fish and Wildlife Service, while others have been intimidated to the point that they now so fear official sanctions, that it is doubtful they would even attempt to defend their own lives from a wolf attack! Should it come as a surprise that local support is "thin?"

Proposed Modifications

Resolve livestock-wolf conflicts in ways that keep the wolves wild.

Some have suggested that ranchers be required to quickly remove or render inedible all carcasses of livestock that die on grazing allotments. While this may seem a reasonable requirement to those unfamiliar with remote, low density ranching, it would be totally impractical for many operations. Some ranches cover 25,000 acres or more, and are located in extremely rugged terrain with very limited, if any, vehicular access. Even if, on the remote chance that the rancher should find a carcass before the scavengers arrive, there is often no practical way of removing it. Rendering carcasses inedible would be at the expense of a multitude of other species that feed on same; some of which may also be protected. This whole idea smacks of "blaming the victim for the crime" which seems to be a favorite ploy of some of the prominent radical environmental groups. Another suggestion one hears emanating from these groups is one requiring calving to take place in one location, or preferably, only on private land. This proposal is totally impractical on the one hand and self-defeating on the other. While it is an impractical livestock management practice, it would also result in the wolves being drawn onto private lands to depredate on calves thus increasing their exposure to the only private legal lethal take now allowed! How silly is that?

Conservation Alternative

There exists some support for changing the classification from "experimental, non-essential" to "experimental, essential" or even to "endangered" to give the wolves additional protection. Such a change would almost certainly not find favor in those communities currently most adversely affected by wolf reintroduction. If the wolf is to survive long term, changes need to be implemented that will provide the most affected parties a louder voice in the decision making process. Denying affected rural people a prominent place at the planning table, and failure to adequately address, or in many instances even acknowledge their concerns, has fostered feelings of distrust and alienation that can result in unintended consequences that could eventually threaten the entire recovery program. Affording even more protection to animals, whose behavior is more akin to that of a pack of feral dogs than to the behavior of truly wild wolves, would seem to be a huge step in the wrong direction. If these wolves are to survive and coexist with the human population in the manner of truly wild wolves (which is my understanding of how this program was initially conceived) those "problem wolves" need to be removed, not granted a federal pardon which makes them tacitly unaccountable for any future transgressions - no matter how

dissimilar the behavior to that of a truly wild *Canis lupus baileyi*.

Altering the Program to Make it Work Better for the Wolf

The following modifications will make it better for the wolf by reducing the opportunity for human-wolf interaction by spreading the population over a much larger area, reducing the number of interactions, and spreading the wolf impact over a much wider area, but at a much reduced level:

- 1.) Keep 100 wolf experimental population goal but expand the primary recovery areas to include other, smaller, geographically dispersed, Primary and Secondary Recovery Areas in Arizona, New Mexico, Nevada, southern Colorado, and southern Utah. Examples include White Sands Missile Range, Grey Ranch area of Hidalgo County, San Mateo Mountains in New Mexico, Carson National Forest, Mesa Verde, San Juan Mountains, Arches/Canyon Lands/Kiaparowits Plateau, Sheldon National Wildlife Refuge, Escalante, Grand Canyon National Park, Kofa GameRange, Sierra Anca Mountains, and areas of the Coronado National Forest. New areas should be remote from one another, contain little or no private land, and should not be located near highways or major secondary roads.
- 2.) Reduce the size of the Secondary Recovery Zone in the BRWRA by removing those areas that are close to significant amounts of deeded land, highways, and major secondary roads.
- 3.) Wolves that establish home ranges outside of a Primary or Secondary Recovery Zone should not be recaptured or removed if the home range is not close to significant amounts of deeded land, highways, or major secondary roads.
- 4.) Increase the opportunity for wild wolves to be truly wild by reducing the handling of wolves by humans to an absolute minimum. Eliminate tagging, vaccinations, and collars and do not supplement feed. (Using pack animals to deliver road kill is an especially bad policy.) Reduce or eliminate regular monitoring, and further reduce the necessity for recapture by allowing re-release only in Primary Recovery Areas and taking the steps set forth above.
- 5.) **Comments from strident NGO's commonly known to oppose ranching as an essential part their mission, should not be given a full measure of consideration.** Such organizations as Center for Biodiversity, Defenders of Wildlife, Forest Guardians, and others, whose avowed agenda is to eliminate ranching on public lands are notoriously prone to use the ESA in ways that advance their own "special agenda" and not necessarily to the benefit of a specific species. Comments such as those recommending "removal of carcasses," "weekly riding," and "single pasture calving," are merely thinly veiled attacks on public lands ranching. The primary purpose of such

Wolf Recovery Program itself. Much clearer rules need to be established as to how depredations are reported and counted. Such rules should be developed by arriving at consensus between property owners, local officials, and the USFWS.

9.) For purposes of reimbursement, abandonment of the practice of specific identification of wolf kills should be encouraged. Use of a statistically based method for determination of calf and cattle losses, should prove to be a more equitable approach. At present, only a small percentage of losses are recognized, and even fewer result in fair compensation. Of special concern are "working ranch dogs" which are valuable ranch assets not easily replaced. Such dogs can easily have more value than several cows and require many months of specialized training. Present rules disallow adequate protection and provide no compensation for loss by wolf predation.

10.) **There exists, at present, no program which addresses (or even recognizes) the catastrophic loss in value of real property that can result when a mated pair of wolves decides to reward your lifetime of stewardship by choosing the family ranch as the location of choice to raise its family** Such an honor may provide an initial thrill, but this will quickly vanish as reality sets in. 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! A fair and just "escape mechanism" must be instituted for those who find themselves, through no fault of their own, in this most unfortunate circumstance. **If one "takes" a wolf there are consequences. If wolves "take" a ranch there should also be consequences.**

Please confirm you have our address and contact information on all appropriate distribution lists for public communications regarding the wolf recovery program.



Jerold L. Collings



Hila M. Collings

Owners/Operators:
Dripping Springs Ranch
Pine Cienega Ranch
Jackson Ranch
Dripping Springs Spanish Barbs
Dripping Springs Land & Cattle

December , 2007

Brian Milsap
 State Administrator, US Fish & Wildlife Service
 New Mexico Ecological Services Field Office
 2105 Osuna, NE
 Albuquerque NM 87113

RECEIVED

Dec 20 2007

USFWS-NMESFO

Fax: (505) 346-2542

Re: Notice of Scoping Meetings & Intent To Prepare Environmental Impact Statement & Socio-Economic Assessment for the Proposed Amendment of the Rule Establishing a Nonessential Experimental Population of the Arizona & New Mexico Population of the Gray Wolf ("Mexican Gray Wolf")

Dear Mr. Milsap:

Thank you for the opportunity to offer scoping comments and issues on the above captioned rule.

I believe that the following issues should be included in the scope of analysis:

1. 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. Appropriately recognize and mitigate impacts to pastoral communities and individuals affected by introduced wolves.
2. Full investigation into the efficacy of livestock carcass removal including the increased cost to livestock operations.
3. Discontinuance of the practice of translocating problem wolves.
4. Prompt control, lethal and non-lethal, of problem wolves.
5. Improve monitoring of wolves to insure that residents of the release areas are informed when wolves are in close proximity and to facilitate documentation of predation on livestock.
6. Amending the 10(J) rule to include the authority to harass Mexican wolves for purposes of scaring them away from people, buildings, facilities, pets and livestock. Specific language is needed to state a person may kill or injure a wolf if threatened by a wolf 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 demonstrates desensitization to human encounters.
7. Amending the 10(J) rule to allow harassing or humanely dispatching of wolves by federal, Tribal or state agencies when wolves exhibit fearless behavior or become habituated to humans and pose a demonstrable threat to human safety. This provision should include providing a federal take permit for local county law enforcement personnel to allow them to lethally take a wolf for immediate protection of human safety.
8. Amending of the 10(J) rule to allow serious and affective methods that will immediately stop wolf attacks on dogs and stop wolves from coming into private property and areas where people live. This should include public education practices that teach people how to deal with habituated wolves and give them the tools to do it. **Also necessary is the need to issue take permits to those who are suffering these types of territorial challenges by Mexican wolves at their homes.**
9. The 10(J) rule should document that people reside in current and potential wolf habitat. The general public has been given the mistaken impression that people do not reside in the wolf release and recovery areas.
10. Maintenance of the livestock production in the release and recovery area.
11. The effects of wolves on watersheds, spread of disease and domestic and wild animal populations.
12. An allowance in the rule for livestock owners or their agents may take (including kill or injure) any wolf engaged in the act of killing wounding or biting livestock on federally administered lands (see definition change) allotted for grazing anywhere within the Mexican wolf Experimental population area, including within the designated wolf recovery areas.
13. The need for definition changes in the new rule and management plans as well as any SOPs, such as:
BREEDING PAIR: an adult male and an adult female that are firmly mated and have the potential to breed and raise a litter of pups in the upcoming breeding season

ACTIVE PACK: two (2) or more wolves that are attached to each other and exhibit pack behavioral characteristics.

DEPREDAATION: the confirmed killing or wounding of a domestic animal by one (1) or more wolves.

INCIDENT: the killing or wounding of a domestic animal by one (1) or more wolves.

ENGAGED IN THE ACT OF KILLING, WOUNDING OR BITING LIVESTOCK: to be engaged in the act of grasping, biting, attacking, wounding, or feeding upon livestock that are alive or were alive within the past 24 hours.

LIVESTOCK: 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. Constitution).

PUBLIC LAND: lands available for dispersion into private ownership under general land laws to which no claim or rights of others has attached.

FEDERAL LAND: lands in which the United States retains a proprietary interest and prior claims and rights are attached.

TAKE: to harm, hunt, shoot, wound or kill.

UNAVOIDABLE OR UNINTENTIONAL TAKE: take which occurs despite reasonable care and is incidental to an otherwise lawful activity, and is not done with purpose. Taking a wolf by trapping will be considered unavoidable or unintentional if the wolf is released and the capture is reported within 24 hours. Taking a wolf will be considered unavoidable or unintentional if the wolf is taken during a legal hunting activity, is non-negligent and is reported within 24 hours.

LEGALLY PRESENT LIVESTOCK: should be defined as livestock occurring in the boundaries of a grazing allotment where the owner has beneficial use water rights on Federal land. (see federal land definition)

14. Retaining definitions that do not warrant changes or additions from the current rule include the following: Occupied Mexican Wolf Range, Opportunistic, Non-injurious harassment, Primary recovery zone, Problem wolves, Rendezvous site, Secondary recovery zone, Wolf recovery area. Specifically, the definition of problem wolf should not be gerrymandered to move the goalposts associated with management of problem behavior.

15. 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 or depredation and losses caused by the program.

6. 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.

7. Change the current methodology for determining a depredation to the more reasonable Minnesota version which allows missing calves to be confirmed as wolf kills under certain circumstances.

8. Analyzing the alternative of discontinuing the program, including the costs and benefits of the program thus far.

Sincerely, Randell Major
P.O Box
Magdalena, N.M.
87825

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

December 30, 2007

Margaret Myles

Subject: Mexican Gray Wolf NEPA Scoping

To Whom It May Concern:

This letter is to inform all readers concerning my opposition to the reintroduction in the state of New Mexico of the Mexican Gray Wolf. Although persons supporting the introduction have a strong argument on their side, it is imperative to truly take note of the knowledge and observations of those making their livelihood in agriculture. All should ponder the fact that without the rancher and the farmer, all people would suffer from famine. While this thought may sound harsh, ranchers, farmers, hunters, and all citizens have the need to feel safe whether they are in the city or in the country. Those living with the land need to feel comfortable and safe as they work tirelessly each day to put food on our tables. In addition, feeling uncomfortable in their outdoor work environment, with the wolf's presence, will likely cause unnecessary feelings of anger, resentment, and opposition to the Fish and Wildlife Service.

Another topic worthy of note is that children living in one wolf reintroduction area wait for the school bus in cages for protection. This is truly backwards as children are not animals to be penned in a cage for safety. What about the rancher, should they make cages miles and miles long to keep wolves out to keep their livelihood and our future food safe? As building huge cages for livestock is unreasonable, having the need to stay in a cage while waiting for the school bus is equally unreasonable. As a free nation, children, parents, agricultural workers, and all citizens need to feel free and safe whether in the city or in the country.

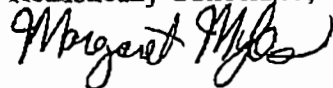
Furthermore, for any reintroduction program to be successful, pros and cons should be equally weighed. Long-term research concerning the reason(s) for the original reduction of the wolves in the specie's native habitat and current opposition to the reintroduction should be studied and evaluated extensively by non-biased individuals. In addition, it is important to note that when a specie such as the wolf is reduced, it is imperative to ask the question, why? If there was no threat to humans, livestock, or the sportsman in the past, I believe the wolf would have been left alone and not be of concern today.

In closing, I would like to share an experience about my neighbor. While growing up in New Mexico, a neighbor had two wolves as "pets" in their highly fenced, caged back yard. Several years ago, the man went out to feed his "pets" and one bit off his hand. The point simply is that "wild" animals are truly wild and can be unpredictable even when efforts for domestication have been made. Although some may reflect on positive or non/harmful experiences in the past, we cannot truly know how wild animals will choose to act. What is known, however, is that when they are hungry, wolves will eat. If a calf, goat, lamb, or other livestock is "easy prey" there is no reason for a wolf to work a little harder to get something wild. In addition, it is impossible for the most diligent livestock producer to keep track of every animal every day. If a wolf is not seen in the act of killing an animal, the worker is out that much money. In agriculture, or in any business, when there are factors individuals have no control over or just miss, economic disadvantage and the dwindling of finances takes place. No one would be eager for the wolf to be introduced into their office or backyard because it was identified as a 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 contact information follows. Please withhold my address from public review.

Margaret Myles

Realistically Concerned,



Margaret Myles