

Sixteen Springs Canyon  
Cloudfcroft NM 88317  
December 28, 2007

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DEC 31 2007

USFWS-NMESFO

Mr. Brian Millsap  
State Administrator  
U.S. Fish & Wildlife Service  
New Mexico Ecological Services Office  
2105 Osuna N.E.  
Albuquerque NM 87113

Dear Mr. Millsap:

Re: Wolf

I am a cattle rancher in Otero County NM. I am 85 years old and have spent all my life ranching in Otero County.

My grandfather and father were both lifelong ranchers who came to the Sacramento Mountains in 1887.

There were wolves here when they came to this area that were called "Lobos."

The government put a \$50.00 bounty on wolves because of the severe damage they did to the livestock business.

The crippling, harassing and killing of animals is well documented as well as the threat to human life.

Therefore, I am against the government's managed wolf program with the proposed intention of releasing additional wolves in New Mexico or increasing the proposed area in which wolves are proposed to be released.

I am a member of many farm and livestock organizations. They were all against the government's release of wolves when the program first started and continue to be strongly against the release of any additional wolves in New Mexico.

The many sporting groups, that I am aware of, are also against releasing wolves because of the threat to wildlife that wolves have.

The hunting and fishing industry is a multi-million dollar industry not only in New Mexico, but throughout the United States.

The sportsmen and women bring significant revenues to the local economies, counties and states which has the probability of being drastically reduced with the release of any additional wolves.

The hunting and fishing industry has already been severely impacted in those areas where wolves have been released as evident from the continual information received from the Gila area of New Mexico.

The revenues lost to wolf depreddations in both the livestock and hunting and fishing industries cannot be recovered and should not be tolerated.

The U. S. Fish & Wildlife Service should furnish unbiased and "Sound Science" information to the public instead of attempting to protect their jobs.

Sincerely,



Charles Walker

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DEC 31 2007

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DEC 3

USFWS-NMESFO

December 29, 2007

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

**Subject: Comments and Recommendations regarding Notice of Scoping Meetings and Intent to Prepare an EIS and Socio-Economic Assessment for Proposed Amendment of the Rule establishing a Nonessential Experimental Population of the Mexican Gray Wolf**

The following are my comments and recommendations in response to the Advance Notice of Proposed Rulemaking/Notice of Intent regarding establishment of a nonessential experimental population (NEP) of the Mexican gray wolf in Arizona and New Mexico (*Federal Register*, Vol. 72, No. 151, pps. 44065-44069, August 7, 2007).

To begin, let me state for the record that I am a strong, fervent advocate for the successful reintroduction of the Mexican gray wolf throughout its historic range, particularly New Mexico. It is my unwavering belief that having gray wolves present again in the deserts, forests and mountains of the Southwest is important for several reasons: 1) greater biological diversity; 2) healthier, more balanced ecosystems; 3) expanded opportunities for eco-tourism in rural areas that have traditionally been economically depressed; and 4) enhancement of the outdoor experience. As an avid backpacker, hunter and fisherman, I am much more inclined to pursue these endeavors in areas where gray wolves are present and thriving.

Issues Related to the Scope of the NEP

*(a) Current management stipulations that require wolves that establish home ranges outside the Blue Range Wolf Recovery Area (BRWRA) to be removed and re-released into the BRWRA or taken into captivity.*

**Comment:** Available USFWS data indicate that removals of wolves for boundary violations are not conducive to achieving the reintroduction project objective of "...reestablishing a viable, self-sustaining population of at least 100 Mexican [gray] wolves." This project objective, in conjunction with valid, empirical field data, must guide and drive all management stipulations governing reintroduction of the Mexican gray wolf. Hence, the 1998 NEP final rule should be amended so as to allow wolves to establish territories outside the boundaries of the BRWRA.

*(b) Current management stipulations allow for initial Mexican gray wolf releases from captivity only into the primary recovery zone of the BRWRA.*

**Comment:** Based on USFWS management experience to date, it is my belief that the 1998 NEP final rule: 1) sets impractical limits on available release sites and wolves that can be released into the secondary recovery zone; 2) limits the reintroduction project's ability to address genetic issues; and 3) creates the mistaken impression that the secondary recovery zone is composed largely of "problem" animals that have been translocated there after management removal due to livestock depredation events. Consequently, the 1998 NEP rule should be amended to provide the USFWS with authority to release Mexican gray wolves from the captive breeding population into New Mexico.

*(c) The definition of the White Sands Missile Range, which is within the Mexican Wolf Experimental Population Area (MWEPA), as the White Sands Wolf Recovery Area (WSWRA).*

**Comment:** The definition in the 1998 NEP final rule should be amended to more accurately reflect the area in question (*i.e.* WSWRA). While it is the current USFWS position that the White Sands Wolf Recovery Area is not of sufficient size nor does it have sufficient prey density to function as an "independent" recovery area, the WSWRA should nevertheless remain an integral component of the reintroduction program due to its unique surface ownership status, sparse human population in the surrounding area, and supplemental prey base. The WSWRA's presumed inability to function as an independent recovery area should not in any way preclude it from contributing to achievement of the reintroduction project's primary objective: reestablishing a viable, self-sustaining population of at least 100 Mexican gray wolves.

*(d) Limited provisions for private individuals to harass wolves engaged in nuisance behavior or livestock depredation, or which are attacking pets on private, public or Tribal lands.*

**Comment:** As indicated in the *Federal Register* notice, current provisions in the 1998 NEP final rule allow for "opportunistic, noninjurious harassment" of wolves by private individuals. The cited language in the 1998 final rule already provides more than sufficient flexibility regarding harassment methods that may effectively deter problem Mexican wolf behavior. The USFWS should err on the side of caution with respect to harassment by private individuals (*i.e.* giving priority to protection and preservation of the limited population of Mexican gray wolves in existence). Much, much more management experience with promising deterrent methods should be gained first in the Northern Rocky Mountain Distinct Population Segment and others before applying such methods in the Mexican Wolf Experimental Population Area.

*(e) Current provisions in the 1998 NEP final rule that do not allow for “take” of wolves in the act of attacking domestic dogs on private or Tribal trust lands.*

**Comment:** The referenced language in the 1998 NEP final rule should remain as it is currently worded (i.e. not allowing for the take of wolves in the act of attacking domestic dogs). Let me preface my comment here by stating that my family has owned both domestic pets and animals for 30 years here in New Mexico; included are dogs, cats, horses, rabbits and chickens. We currently have 1 dog and 3 cats. A few years ago, we lost a cat to coyotes. I am therefore extremely empathetic with individuals and families whose animals have been or may be attacked by predators such as the Mexican gray wolf. Notwithstanding my empathy, no one should be allowed to injure or kill a Mexican gray wolf for attacking a domestic dog--even if the attack occurs on private or Tribal lands. At this juncture, the viability of the current Mexican wolf population is simply too tenuous to allow any such injury or killing. Only attacks on human beings warrant such drastic actions with irreversible consequences.

*(f) The need to identify possible impediments to establishing wolves, such as livestock carcass management and disposal issue identified in the 3-year review of the project.*

**Comment:** The referenced review (Paquet *et al.*, 2001, p. 69) included a recommendation that the USFWS “...require livestock operators on public land to take some responsibility for carcass management/disposal to reduce the likelihood that wolves become habituated to feeding on livestock.” I strongly and fully support the recommendation cited above. Such recommended action by public land management agencies is long overdue--and is even more critical now given reintroduction of the Mexican gray wolf. Livestock operators on public land can and should be held to a higher standard; indeed, it is the public’s land they are operating on. And because that public land is a critical component of the reintroduction program, livestock operators must be forced to assume predominant responsibility for carcass management and disposal. Moreover, the definitions of “nuisance wolves” and “problem wolves” should be amended accordingly so as to exclude animals that scavenge on the carcasses of livestock that died of non-wolf causes.

*(g) Parallels and contrasts between the gray wolf reintroduction efforts in the Greater Yellowstone ecosystem and the Mexican Wolf Experimental Population Area.*

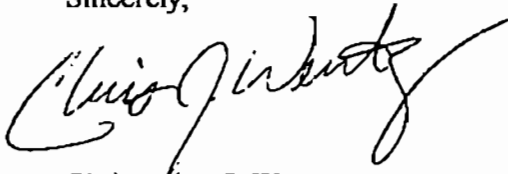
**Comment:** The draft EIS should examine and delineate in detail the parallels and contrasts between the highly successful reintroduction program in the Greater Yellowstone ecosystem and that in the Mexican Wolf Experimental Population Area. Factors such as surface acreage, land ownership status, topography, prey diversity/density, and management stipulations should be included.

*(h) Socio-economic Assessment for the Proposed Amendment of the Rule establishing a Nonessential Experimental Population of the Mexican gray wolf.*

**Comment:** Virtually no information is provided in the *Federal Register* notice regarding guidance for the scope and conduct of this socio-economic assessment. It is my fear that--absent a fair, unbiased analysis--this assessment may result in amendment of the governing rule to the detriment of the reintroduction program's objective: reestablishing a viable, self-sustaining population of at least 100 Mexican gray wolves. At a minimum, the assessment should analyze the reintroduction program's current and potential socio-economic impacts (both positive and negative) on individuals and businesses in the Mexican Wolf Experimental Population Area; eco-tourism impacts, as well as those stemming directly from professional program participants and observers, should be included.

In conclusion, I wholeheartedly support reintroduction of the Mexican gray wolf in Arizona and New Mexico. The management policies, guidelines and practices of the USFWS must be geared predominantly toward protection and preservation of the Mexican gray wolf--not livestock operators' interests.

Sincerely,



Christopher J. Wentz  
P.O. Box 2174  
Corrales, NM 87048  
wentzcca@cs.com

## How to Submit Comments

Written comments accompanied by name and address will become part of the formal record of the scoping process. While you may provide your ideas verbally during the meeting, we want to make sure your input is formally captured in your own words. You may submit written comments in three ways:

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- Take the brochure with you and return it by mail
- Provide comments via e-mail. For your convenience, you can do that here at the computer station, or visit [www.mexicanwolfeis.org](http://www.mexicanwolfeis.org)
- Faxed comments may be sent to (505) 346-2542

Please note: In order to be considered part of the formal record, your comments must include your name and address. Comments may be submitted through December 31, 2007.

Before including your address, phone number, e-mail address, or other personal information in your comment, you should be aware that your entire comment--including your personal information--may be made publicly available at any time. While you can ask us in your comment to withhold your personal information from public review, we cannot guarantee that we will be able to do so.

## Comments:

Reintroducing the Mexican Gray Wolf into the wild is a bad idea. The reason the wolves were eliminated in the first place is that they did more harm than good. Trying to reintroduce the wolves into areas beyond where they have already been introduced will do more harm than good. The cost of the program is way out of line for any possible good obtained. If the wolves come into places like Otero County, it will do great harm to the cattle business, the hunting business and the tourist business. I understand the wolves have eliminated the elk from the areas where they have been reintroduced. They have, and continue to do great damage to the cattle industry. They kill more than they can or need to eat. The wolves become a threat to human life as well. We just do not need the Mexican Gray Wolf running around wild in Otero County. Please keep them out.

Hans Steinhoff  
PO Box 29  
Cludcroft, NM 88317

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USFWS-NMESFO

Name: \_\_\_\_\_

Street: \_\_\_\_\_

City, State, Zip: \_\_\_\_\_

Tape closed with address on outside, and add a stamp.

DO NOT STAPLE  
Thank you for your input!

December 27, 2007

Brian Millsap  
State Administrator  
U.S. Fish and Wildlife Service  
Ecological Services Field Office  
2105 Osuna NE  
Albuquerque, NM [REDACTED]  
87113  
Fax (505)346-2542  
Email: [R2FWE\\_AL@fws.gov](mailto:R2FWE_AL@fws.gov)

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USFWS-NMESFO

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:

We would like to comment on the above referenced scoping process. As residents of New Mexico, I am writing to express the following concerns I have with these proposed amendments.

- The issue of human safety must be addressed. Wolves that stay around homes and communities threatening children, harming pets and killing livestock should not be allowed to remain in the program and should be dealt with immediately.
- The continue feeding of wolves by US Fish and Wildlife Service and Game and Fish personnel should not be allowed to persist. Although it may alleviate a short term problem, it in turn only creates a bigger and longer problem with habituation.
- 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.  
[REDACTED]  
[REDACTED]  
[REDACTED]
- 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.

Boundaries should not be expanded until this program can show some type of success nor should it be considered at this time.

- Carcass removal by livestock operations is not a realistic option, nor can its effects be proven at this time.
- The removal of problem wolves through lethal means needs to remain an option.
- Diseases carried by wolves that are harmful to humans and domestic livestock need to be addressed.
- 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,

*Rich Wilson*

*Three Links Ranch, P.O. Box 186  
Magdalena, New Mexico 87825*



December 27, 2007

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

87113

Fax (505)346-2542  
Email: [RCFWE.AL@fws.gov](mailto:RCFWE.AL@fws.gov)

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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,

Carl & Amanda Montoya  
Three Links Outfitters  
PO Box 1135  
Magdalena, NM 87825

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## Comments:

As ranchers in Chaves County, we believe the USFW wolf program places yet another financial burden on America's depressed and struggling ranching community. Predation of livestock by wolves have a direct impact on the profitability of both sheep and cattle ranches and can make the difference between a profitable and unprofitable operation. Continued re-introduction of the wolf may ultimately put some, if not all, small and family run ranch operations out of business. Additionally, the federal government's re-introduction of the wolf poses a threat of physical harm and even death to our families (particularly small children) and pets. We are shocked that the NMG&F has not strongly opposed the plan, given the certain negative impact the wolf will have on the already dwindling mule deer population.

As citizens of this country, we believe the government's continued efforts to re-establish the wolf in New Mexico, indeed in the entire southwestern United States, places our safe, domestic beef supply in jeopardy. Limiting and possibly eliminating the domestic beef supply in turn, jeopardizes our national security. The program currently uses a significant amount of taxpayer money and will place an even higher burden on the taxpayer in the future due to the inevitable civil and criminal lawsuits that will be brought against the USFW Service and the Federal Government for its/their responsibility and action in: 1) the loss of human life due to wolf attacks, and; 2) the financial hardship which is indiscriminately being placed on the America's ranching community by the USFW Service.

We fail to see any tangible benefit to the wolf reintroduction program. The true results of the program are detrimental to this nation and its citizens. We strongly urge the USFW Service to give as much consideration to the well being of this nation and its citizens as it has the misguided whims of environmental and animal rights lobbyists and activists by discontinuing its wolf re-introduction program entirely.

Thank you taking the time to read our comments.

Terry Michael  
Matthew Michael  
24 Little Cuevo Canyon Road  
Hope, NM 88250

# RECEIVED

JUL 31 2007

USFWS-NMESFO

Name: Terry Michael

Street: 24 Little Cuevo Canyon Rd

City, State, Zip: Hope, NM 88250

Tape closed with address on outside, and add a stamp.

DO NOT STAPLE  
Thank you for your input!

December 31, 2007

Brian Milsap  
State Administrator, US Fish & Wildlife Service  
New Mexico Ecological Services Field Office  
2105 Osuna, NE  
Albuquerque NM 87113  
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 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. Analyzing the alternative of discontinuing the program, including the costs and benefits of the program thus far.

Sincerely,



Marie Haumont  
1265 Cottonwood Rd.  
Roswell, NM 88201

December 31, 2007

Brian Milsap  
State Administrator, US Fish & Wildlife Service  
New Mexico Ecological Services Field Office  
2105 Osuna, NE  
Albuquerque NM 87113  
Fax: (505) 346-2542

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

Sincerely,



John Haumont  
1265 Cottonwood Rd.  
Roswell, NM 88201

**Superior Title Co**  
407 S. Central Ave  
Carrizozo, NM 88301

---

**confidential**  
**fax**

*To:* **Game and Fish**  
*Fax Number:* 15053462542

*From:* **Welda Grider**  
*Fax Number:* 1-505-648-5573  
*Business Phone:* 1-505-648-5575  
*Home Phone:*

*Pages:* 4  
*Date/Time:* 12/31/2007 5:11:30 PM  
*Subject:*

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*Welda McKinley Grider  
PO Box 990  
Carrizozo, NM 88301*

U.S Game and Fish and Wildlife Service  
New Mexico Ecological Services Field Office  
2105 Osuna Ne  
Albuquerque, NM 87113  
By fax: 1-505-346-2542

Re: Wolf introduction into that area South of I 40, North of I 10 and West of I 25

To Whom It May Concern:

I stand in opposition to the advancement of releasing wolves in the area so named for the following reasons:

- Tax dollars to date spent on this project is more than \$14 MILLION dollars with little or no success.
- The wolves being released are not true wolves and the Game and Fish Department has admitted they are hybrid animals, bred in captivity and therefore not capable either by genetics or by virtue of being raised in the wild of killing in the natural order of "wild" animals (which is to kill the sick or less able animals for food).
- Therefore the animals they do kill are domestic animals (i.e. household pets such as dogs or cattle). These domestic animals are not equipped to withstand an onslaught of a pack of dogs (hybrid wolves).
- If a calf is killed, the worth at time of death is about \$400.00. However domestic cattle are a commercial entity with income potential. A beef cow of breeding age is worth \$1000.00. The normal cow will have between 10 and 12 calves during her breeding years. The cows' total worth would be aprox. \$10,000.00.
- The potential calves she would have given birth to in a ten year period would be 8 (cows do not calve until aprox. 2 years of age). Those animals at breeding age would be worth \$1,000.00 each. That would equate to an additional \$8,000.00 value of commercial loss. Those cows would then have calves and so forth.
- However most calves are sold at weaning age and would bring aprox. \$500.00 each. Using the 10 year period and the 8 calves, the loss would be more than \$4,000.00.
- If there is any compensation (which normally does not happen due to the mandate the wolves must be caught in the act or documented as killing a domestic animal) it is priced on the worth of the animal at that time and not Rancher's inventory and as such have more income potential than the loss at time of death.

- Ranchers make up 2% of the nations population. As such, we feed America and most of the world. To impose great monetary losses upon such a vital part of America's commerce is inherently unfair and will adversely affect our Gross National Product.
- New Mexico is sparsely populated and largely agricultural. A large part of the ranching community are those who raise 100 or less cows per year. An income loss of \$10,000.00 or less would cut the profitability and render some unable to continue ranching. Part of the beauty and promise of New Mexico and the reason

- I would like to address the term “reintroduction”. I am a 4<sup>th</sup> generation rancher on both sides of my family. Both sides came to New Mexico in the early 1900’s (1904 and 1906 respectively). There were no “wolf packs” at that time. There was the occasional wolf but like the Mountain Lion, seldom seen and seldom in packs. So if they have not been here in 100 plus years, then the term “reintroduction” is misleading and should not be used. The plan is to “introduce” wolves and hybrid wolves at that.
- What is this going to cost? More than \$14 million obviously because the tax dollars are still being spent. More than \$10,000.00 per rancher affected- obviously because that cost is still mounting. Income potential to developers who are developing small “ranchettes” because few people will move their families to an area and put their children at risk. The chance of a child being mauled or killed? What is the price of a child?
- My question to you is this? What are the costs –real costs to the public? My other question to you is what is the gain? What exactly is the gain?

Again I want to say I stand in full opposition to this measure.

Respectfully,

Welda McKinley Grider

# FAX

To: Brian Milsap

Fax: 505-346-2542  
Phone:

From: Mike G. Casabonne

Fax/Phone:

Number of pages  
including this one:   4  

Re: Comments on Mexican Wolf EIS

Mike G. Casabonne  
P.O. Box 1416  
Hope, NM 88250

December 31, 2007

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

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.

We 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 rural communities and individuals affected by introduced wolves. Studies to document above impacts should be conducted scientifically by qualified professionals. In addition those conducting the studies should be able to demonstrate a lack of bias in favor of wolf reintroduction.
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 areas frequented by people or 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 effective 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. The long-term effects on continued livestock production in the release and recovery area.

11. The effects of wolves on watersheds, spread of disease and the potential for wolves to infect domestic and wild animal populations with disease.
12. An allowance in the rule for livestock owners or their agents to 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.
  - DEPREDTION: 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 for depredation and losses caused by the program.
16. Implementation of 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 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.
19. Analyze the positive impacts of discontinuing the program and removing all wolves to enclosed areas where they are not a threat to livestock, pets or human safety.
20. Requiring that any negative impacts to private individuals or local communities, governments or institutions should be fully mitigated before the program is allowed to continue or expand.
21. The impacts of wolves ranging outside the boundaries of defined recovery areas should be included. Wolves anywhere within the states of New Mexico, Arizona and Texas should be subject to removal by any means possible if they pose a threat to livestock, pets or humans.
22. An objective analysis of past and present actions of wolf program personnel should be conducted to demonstrate how personal bias in favor of expanding wolf numbers influences on-the-ground decisions and



actions. Program personnel should establish and maintain credibility with local residents. This program should not be allowed to continue if its administrators and personnel believe they must resort to dishonest and deceptive actions for it to succeed.

Sincerely,



Mike G. Casabonne

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

DATE: December 31, 2007

FAX #: (505) 346-2542

FROM: Sharon Kartchner  
P.O. Box 31  
Mule Creek, NM 88051

SUBJECT: Comment on Mexican Gray Wolf Reintroduction Program

TOAL NUMBER OF PAGES: 3

December 31, 2007

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

Dear Mr. Slown:

First of all thank you for the opportunity to learn more about the current status of the Mexican Gray Wolf Reintroduction Program and the suggested modifications. I attended two of the scoping meetings held in our area.

I am a 4<sup>th</sup> generation rancher in the area adjacent to the Recovery Area in the Gila National Forrest and slated to become part of the proposed extended population area boundary. We have always taken great pride in managing our wildlife populations in conjunction with our cattle industry. Occasionally we do have predator issues with hogs

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would ultimately force us to give up ranching. Our only other alternative would be to sub-divide the ranch, and sell it off in small parcels. That would, in turn, force all of the current established populations of other wildlife species to leave this acreage. So, please, in the end, leave the **private landowner** with uncomplicated options to protect themselves, their families and their livestock.

Thirdly, any incentives or depredation incident rules need to be realistic for our area. We do not have "fields" that we can monitor on a daily basis and it is unreasonable to alter our property wolf proof.

Thank you for the opportunity to participate. I would like to think we can work together for the successful establishment of the Mexican Gray Wolf without putting the rancher and landowner out of business. Over the years, it has become increasingly difficult to accommodate all the changes, but hopefully our stewardship of the land, the wildlife, and the livestock we are responsible for will prevail.

Sincerely,



Sharon Kartchner  
PO Box 31  
Mule Creek, NM 88051

**James Snow, Bs.**

1021 Calle De Oro, W-6  
Taos, New Mexico. 87571

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

RE: Concerning the Future of the Mexican Gray Wolf.

Monday, Dec. 31 2007

Dear Mr. Millsap, B:

I am all the sudden inspired and very honored to write you and submit personal comments, in response to the Articles I had read recently in The Wild and the High Country News, the Changes to the Final Rule affecting the Future of the Mexican Gray Wolf.

In Regards to attaining Full-Recovery status of the Mexican Gray Wolf, compared to the presence of the Wolf Historically, before Human Settlers arrived, that is only a very small fraction. It is very insignificant.

Looking at the Sequence of Events historically, I am very discouraged that as Stewards of the Land, that is how we value the Ecosystem with which we derive our co-existence—that we would ever let it reach this point. The future of the Mexican Gray Wolf is at stake.

The Proposed Final Rule Changes have to reflect the Nature of the Mexican Gray Wolf, as a Terrestrial Carnivore; and the Citizens of Arizona and New Mexico. Clearly, the people – want the Lobo reinstated into its Natural Habitat, indefinitely.

The Nature and the Biology of the Mexican Gray Wolf is very encouraging. I think we know everything we need to do. The Skat findings is indicative of what the Mexican Gray Wolf eat. The Findings are already listed. I think this is very encouraging, News.

This is a contentious issue I realize. Regarding the future of the Lobo, I also understand the importance of protecting genetic diversity. I mean, we're already dealing with a fragile Ecosystem fragmented – We have to find some common ground. I think the Citizens of Catron County should be thankful something is being said and also being compensated, in part by the environmentalist to protect and Endangered Keystone Carnivore that will only enhance the future of the Ranch.

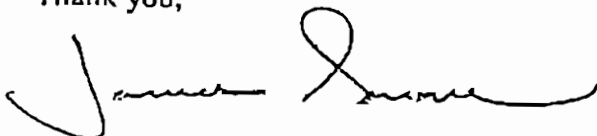
I am speaking from the perspective of over-coming adversity, myself; despite being stigmatized as having a Cognitive Learning Disorder, I have completed a Bs. Degree in Wildlife Science, awarded by the Fish and Wildlife Dept. at New Mexico State University: The Fall Semester of 1999.

In being genuine in this place, I am a Native Citizen of New Mexico. I have an important voice in this matter. I am from Hatch, New Mexico: Born and raised to a Family living on the Farm in the early 1960's. I know what its like to work on the Farm in rural Hatch, NM. And barely scrape by. I am from a hard place, as well. But, I would not trade it for anything else.

Looking at this issue concerning the future of the Lobo and the strife involved, – I think the people of Catron County are coming from a place of Fear in having their livelihood taken away from them. Fear breeds hatred; and hatred breeds violence. I do not think that's what we're looking for in this place of protecting – not just an Endangered Keystone Carnivore, but our own future, as well. I know we can find a way, and it doesn't mean getting rid of the Mexican Gray Wolf.

On behalf of the Citizens from Hatch, New Mexico, Thank you for reading this letter.

Thank you,

A handwritten signature in black ink, appearing to read 'James Snow', written in a cursive style.

James Snow, Bsc.

**HOOSER RANCH**

980 NM St. Rd. 569  
Springer, NM 87747

P.O. Box 757  
Springer, NM 87747

575-483-5000 h  
575-447-0157 c

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DEC 31 2007

USFWS-NMESFO

December 28, 2007  
Brian Milsap  
State Administrator  
US Fish & Wildlife Service  
New Mexico Ecological Services Field Office  
2105 Osuna, NE  
Albuquerque New Mexico 87113

Dear Brian,

Thank you for the opportunity to be a part of the scoping meeting concerning the decision to continue the wolf reintroduction. In the brochure you state that USFW want "recommendations for recovering the Mexican wolf." Based on what I learned during the Grants and Albuquerque Scoping Meetings, I have several recommendations.

First, at this point, leave the wolves alone. From here on out, do not reintroduce more wolves, do not give wolves veterinary care of any kind, do not feed wolves in any way, and do not relocate wolves that wonder beyond the primary Blue Range Wolf Recovery Area (BRWRA). However, allow people to control the population like other predators in New Mexico are controlled. The wolves that have been habituated to humans, or learn behaviors from wolves or parents that have been around humans, will learn to stay away from humans, or will be eliminated. The wolves that stay away from livestock, humans, barns, backyards and school grounds will survive like the wild animals that they are.

It is not natural for the wolves to be captive bred, and then reintroduced. It is not natural for veterinary care. It is not natural for wolves to be captured and re-released, for what ever reason.

Second, if there are 300+ captive-bred wolves awaiting release, this does not seem like it is treating these wolves with any fairness or respect. Having been bred in captivity, they are not wild animals. The young pups that they produce in the wild have a slim chance to be wild, as their ancestors once were, since they will learn from their human habituated parents how to get along in the world.

Third, I learned from Chara Lefton, from the Albuquerque USFW office, that the whole process is based on the scientific method. In reviewing the method that elementary school students are first introduced to, the scientific method is based on the conviction that the process must be objective to reduce biased interpretation of the results. If the experiment is to see if wolves can be successfully reintroduced, the unbiased data, collected in an unbiased method, should be shared with everyone involved in the process. The scientific method should not be feared for the results, but should be used for the truth gained, whatever that may be.

Also, within the USFW scientific methodology, where is it defined what success is. Is success based on human desires, alone? Does the outcome give any weight to how the wolf is not being treated as a wild animal, but as a pawn in the struggle to define what our environment is to look like?

Or will there be wolves on the landscape, no matter what? I heard Mr. Tuggle and Ms. Lefton make this statement on separate occasions. In which case, this is not an experiment; it is a mandate that makes a sham of the scientific method and this scoping process. It is a mandate that berates the very wolves for whom the proponents claim to have such respect.

The idea that there are so many wolves to be released, seems like the scientific method is not really being used. The wolf program seems set for failure, at a huge cost to the tax payer, and to the Mexican Grey Wolves.

Fourth, within your methodology, what is a "viable population"? Is it genetic diversity? Is it numbers of individuals? Is it breeding pairs? What is your definition? Do you know when you have arrived? If you do not have a way to measure, you do not know if you've failed or succeeded.

Fifth, what about the use of rubber bullets by folk who see the wolves close to their homes to deter the wolves that get too close to humans? What about the use of paint balls for civilians to shoot at the habituated wolves that get too close? No mistaking which wolf with a paint mark on him or her.

Sixth, I have a concern for the idea that a rancher can not defend his property on public lands, even if the wolf is caught in the act of depredation. If the rancher pays the lease, and has permission to run livestock, the protection of that livestock should be a given.

Seventh, if wolves can be infected with rabies, and they get close to pets, the transmittal of rabies is a possibility. The shooting of wolves close enough to infect pets, seems like a good human safeguard against this terrible disease. Pet owners should have the same ability to shoot a wolf attacking their pet as a rancher has to protect livestock under attack.

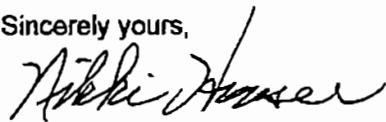
Finally, in your consideration of socioeconomic effects, and impacts on human health and safety:

- 1) What have been the effects on children in the reintroduction area?
- 2) What is the economic analysis of rural families and the communities and counties in which they live? Counties rely on the property taxes from livestock. What happens to grocery stores, other retail merchants and schools in communities that rely on rural folk and the livestock industry for their economic survival?
- 3) How does the lack of sleep from worry effect the rancher and the rancher's ability to go about all the jobs and roles that rancher has in his/her family, community, state and nation?
- 4) What does the helpless feeling of not being able to protect your family or livelihood from a predator do to a person? What do you do when it seems as if your government cares more for an animal than it does for you, your spouse 's and your children's well-being?

There is a study done by a NMSU professor that addresses these areas within the reintroduction area. I hope it will help with the analysis of the socioeconomic aspects of your process.

Thank you for the consideration of my ideas.

Sincerely yours,



Nikki Hooser



**HIDALGO SOIL AND WATER CONSERVATION DISTRICT**

**405 Duncan Hwy.  
Lordsburg, NM 88045  
(505) 542-9141 SWCD**

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**December 27, 2007**

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

Dear Mr. Millsap:

The Hidalgo Soil and Water Conservation District would like to express comments to be addressed in the final EIS:

The Hidalgo Soil and Water Conservation District has received several letters asking for our support to bring attention to the Wolf Management issues. These letters and articles are the views of people the District represents and it is the District's duty to comment.

The first issue that must be addressed is Human Safety. It has been reported that recently two wolves entered the Lake Roberts area, Catron County residents are putting up "child shelters" to allow the kids to get to and from their buses safely, and one school was on an actual "lockdown" during recesses due to a wolf report. Protection of animals is important but when that protection allows for the endangerment of children some changes need to be made. One important concern is that the New Mexico populations of Gray Wolves has interacted with people as part of the re-introduction program and are no longer wary of people as most "natural wild" animals are. This has led to wolf sightings within backyards and in close proximity to areas that are populated with humans. The common rebuttal to this concern for Human Safety is that there have been no reported attacks on a human. The Hidalgo Soil and Water Conservation District would like to see the situation taken care of before there are any reported attacks. It seems that the children are being "caged" so that the Grey Wolves may roam free.

The second issue that must be addressed is that the current method of determining depredations are not providing for the real amount of cost and harm. The Wolf Re-introduction program is a publicly funded program and yet it is costing the individual Ranchers throughout New Mexico more than most people know. It has been stated that "The wolf is probably the most dangerous object facing our industry in the southwest." (New Mexico Cattle Growers) Wolf attacks on cattle may only be reported if they KILL a large animal. Those reports do not include the numerous calves that are taken or the cattle that are greatly injured but are not immediately killed by a wolf. Secondly it has

been proposed that the Rancher needs to remove all carcasses from their property to deter future attacks. This is both costly and highly ineffective. Other animals in the ecosystem depend on these carcasses for survival. And attacks from the wolves will continue with or without carcass removal. Compensation for animals killed by wolves is already not enough without adding the removal of carcasses to the cost.

The third issue that the District would like to address is the method of protection for both Human and Animal purposes. The District strongly suggests that the removal of problem wolves by lethal means needs to remain an option. There has to be a way to protect your children, pets, and livestock against wolves. The re-introduction program is to establish the wolves into the wild. Any other wild animal that is attacking a child, pet, or livestock would be shot, why would wolves be any different.

Thank you for the opportunity to comment and for your attention. We look forward to an EIS that addresses these concerns and impacts of the program.

Sincerely,

Kris Massey, Chairman  
Hidalgo Soil and Water Conservation District

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DEC 31 2007

USFWS-NMESC

December 30, 2007

Mr. Brian Milsap  
State Administrator, US Fish and Wildlife Service  
New Mexico Ecological Services Field Office  
2105 Osuna, NE  
Albuquerque, NM 87112

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:

I am writing to offer the following scoping comments on the proposed rule amendments noted above. I appreciate the opportunity to do so, especially knowing that all of the numerous and diverse comments submitted will receive careful consideration, and that your team must carefully balance your species conservation mandates with your responsibilities towards the health and safety of Americans that may directly be involved in human-wolf interactions. I suggest that particular consideration be given to comments from those residing within the present and proposed wolf areas. I submit that these American citizens have a reasonable expectation to be secure in their private property rights and other constitutional protections, and that this expectation be given its full and proper weight in your decision making process.

My wife and I own and operate a cattle ranch in northeastern Guadalupe County, New Mexico. While we are just immediately to the north of the proposed expanded boundaries (just north of I-40), we are very concerned about the eventual impact that wolves may have on not just our operation but on those of other southwestern livestock producers and rural communities as well. In the context of global warming, peak oil supplies, runaway energy costs, skyrocketing populations, diminished aquifers, and uncertain agricultural production outlooks, our national food supply may come to demand more production of animal protein from native rangelands than ever before. Indeed, in the not too distant future, as a matter of national food security, this may necessarily take precedence over other resource management considerations such as providing habitat for non-essential experimental populations of species that prove to be intractably problematic when introduced in particular locations.

The introduction of such major predators as wolves onto privately owned, non-wilderness, non-wild working range landscapes, such as much of the proposed expanded recovery area (that which is not already settled or inhabited), especially in areas without a requisite prey base (excluding domestic livestock and pets), would be, in our opinion, ecologically unnecessary, economically harmful, and socially disruptive. While we understand and appreciate the argument that wolves have a place as “keystone predators” in “native ecosystems” (such as are still largely extant in Alaska or Africa’s Serengeti), we believe it can be demonstrated that most of the proposed expanded range is no longer a sparsely inhabited “wilderness” suffering from the lack of a keystone predator (human beings, and their ever improving management systems are functionally filling this niche) and that the costs of introducing wolves to our living spaces and working landscapes will far exceed their presumed and yet undemonstrated (in our geographic and ecological context) benefits to society, both at large and especially for the many “front-line” communities directly involved.

No expansion should be considered or implemented without full consultation and cooperation of the local jurisdictions concerned, including proper training and full contingent funding for the health and safety authorities, who would necessarily become involved. Federal resources must also be available and committed to promptly address depredation, disease (e.g. rabies), and other management issues as they may arise.

Any depredation compensation programs should not be dependent upon private NGOs who may or may not be reliable in terms of indefinite and open ended commitments or possess the potentially unlimited resources to answer future wolf depredations on property (domestic livestock, horses, and pets) and possibly persons. (While it has been repeatedly noted that wolves have rarely attacked people in the United States, this past behavior has been largely in the context of a sparsely settled continent and a well-armed frontier population possessed of an aggressive control ethos. Long documented experience in Russia and the former Soviet Union, as outlined in the recently published “Wolves in Russia” (2007, see [temerondetselig.com](http://temerondetselig.com)) documents that thriving wolf populations, proximate and well habituated to human communities, are quite capable of the repeated taking of the lives of livestock and persons, especially children. It has been argued that American wolf behavior is categorically “different” from that of their Russian cousins, and that recently recorded North American instances of stalking, “prey-testing” behavior are merely displays of “curiosity.” Peer-reviewed research to verify this contention should certainly be conducted prior to any further release or program expansion to assure the public that their lives and property are not being negligently endangered. Consideration of experience with wolves and other predators (such as tigers in rural India) elsewhere in the world and North America should be fully considered in further evaluating potential program risks.

The calculation of “depredation values” for livestock should consider not just the sale barn “market value” of a particular animal, but also the opportunity and replacement costs (replacement cost is more appropriate than the market cost of a “cull animal”), special genetics (especially in the case of expensive breeding stock), the value of having

an animal acclimatized and habituated to a particular environment and pasture layout, and the value of any previous training or handling/conditioning that they may have received. Accounting for missing calves needs to recognize that a carcass will not always be available for inspection (a knowledgeable observer will recognize a tight-bagged cow as having lost a calf), and consider the revenue that the calf would have likely realized at weaning.. Such calculations could be developed by agricultural economists such as those working with the New Mexico Range Improvement Task Force.

Perhaps some form of “no fault” calf loss insurance could be developed, based on actuarial and statistical methods that compare a range of historic livestock loss probabilities for given causes and given locations; any losses in excess of such expectations might be eligible for compensation. Care must be taken that losses not exceed certain sustainable thresholds so that livestock operators are not discouraged (through suffering unsustainable losses in the face of ineffective prevention measures) from investing in herd improvement and best management practices (such as costly health programs).

Depredation should not just include death or physical injury but should include the effects of harassment stress that may be detrimental to both livestock reproductive and production performance, as well as having negative influence on future handling behavior. The extra cost burden on livestock operators for proscribed proactive predator management should be recognized, including the stress and anxiety that may sometimes take a personal toll. Another area of potential loss that needs to be considered is loss of property and ranch business values in areas where wolf predation has (or is perceived to have) negatively impacted livestock production and thus ranch real estate and associated grazing permit (where applicable) value.

A depredation compensation program should be established for domestic pets and “companion animals.” Compensation should take into account the emotional impacts of such losses.

Peer-reviewed depredation studies should be conducted to more accurately assess the impact of predator depredations on livestock operations. Current claims of negligible impacts of wolf depredation on cattle and sheep operations, noted on websites of such organizations as Defenders of Wildlife, fail to make a proper “apples to apples” comparison when they compare predator depredations (on western ranges) to those from “respiratory disease” that occur almost exclusively in confined animal feeding operations. Furthermore, the “low” total numbers of livestock losses to wolves may be presumed to be in relation to the number of wolves present on relatively few areas. Historic narratives (and art, e.g. C. M. Russel) provide extensive examples of extensive predation on livestock prior to the culmination of control efforts. Credible peer-reviewed studies should be conducted on the potential for livestock depredations prior to further program expansion.

Full consultation with and leverage of the expertise and resources of such entities as the Range Improvement Task Force (NMSU) and the New Mexico Department of Game and

Fish (especially the “Innovative Wolf Management Project” initiative) should be utilized in addressing these complex and often contentious issues. Efforts should be made to minimize agency and disciplinary rivalries, conflicting organizational missions and cultures, and “turf” disputes in developing a cooperative approach that fully respects the rights and reasonable interests of all involved. Consider engaging a qualified facilitator with conflict mediation skills to engage all stakeholders involved.

Within the existing recovery area the following should be considered:

Effective measures need to be developed and instituted to prevent habituation of wolves to human beings, their dwellings, and normal activities. This includes cessation of the practice of returning depredating wolves into areas where they are likely to re-encounter human presence and activity. This also includes ending the practice of resetting the “depredation scorecard” to zero each calendar year, as this has been shown to lead to increases in cumulative depredation incidence.

Wolf release protocols should be revised to further minimize the possibility of wolves becoming accustomed to human smells, sound, etc.

Methods should be considered to instill in wolves a fear of humans and encourage avoidance behavior.

Protocols should be developed for “wolf tourism” to insure that such activities do not inadvertently contribute to habituation that may lead to future depredation behavior.

Efforts should be made when providing elk carcasses, etc. to newly released wolves to insure that these are not possibly associated with human provisioning.

All measures should be taken to prevent wolf-dog interactions, including potential for hybridization and transmissions of disease, such as rabies. Any hybridized dog-wolves should be promptly identified and removed. Demonstrate that all members of the present wolf population are indeed genetically pure and not, as some have claimed, already hybridized with dogs.

Consider the development of a “zone system,” related to population densities and uses, for segregating primary human and wolf habitat, minimizing human-wolf interaction and conflict, and discouraging wolf habituation to human presence and activity. For example, urban, suburban, and recognizable community areas should be classed as “wolf exclusion zones” where wolves can be aggressively harassed (including a lower threshold for lethal control) to effectively exclude wolves from human communities and their immediate vicinity (just as bears and mountain lions are today). In actual “wilderness” areas, wolves would have the greatest “sanctuary zone” status and protections. In between these two poles would be a range of zones with varying protocols as appropriate. For livestock operations, certain practices, incentives, and considerations should be available according to the level of conflict potential. These might include reasonable incentives to harbor wolves on particular ranges, improved monitoring and reporting of wolf location and

movements, development of a pilot “no-fault” depredation loss insurance pool (should that prove practical), or participation in controlled studies comparing the efficacy of various anti-depredation practices and technologies (with adequate compensation for losses). These latter might include shock collars to “teach” aversion behavior towards livestock. Perhaps “denning pastures” could be leased from livestock operators; similarly certain pastures could be designated as “calving pastures” with extensive protective measures in place.

Careful and critical analysis of the total costs and benefits (including demonstrable ecosystem benefits) of the program should be undertaken and made publicly available. Suggestions should be solicited for making the program more cost efficient and cost effective. The program budget, including reserves for reasonable contingencies, should be publicly available. Different phases of the program should not proceed until funding is secured and released.

As a livestock producer, I’ll note that some of the proposals to remove livestock carcasses (that may have died from causes other than predation) are simply not practical on extensive ranges. It should be noted that the groups proposing a mandate for carcass removal are on record for having as their goal “putting ranchers out of business”, and that this proposal may be as much to harass ranchers as it is to presumably prevent wolves from developing a taste for beef. Requiring ranchers to remove carcasses killed by wolves is indeed adding insult to injury.

While the recovery of endangered species, including predators, is a national policy goal, vocally supported by significant segments of American society, it’s acceptance by all societal segments, including especially those directly impacted by the recovery efforts, will only take place in the context of the appropriate setting for such a recovery, one that is not unavoidably a stage for conflict and competition between the introduced predators and the human communities and pastoral/agricultural economies already present. I submit that the area proposed for expansion, as a working landscape and not an undeveloped “wilderness” (as found in Alaska or the Serengeti) is not an appropriate location for harboring such a non-essential experimental predator population that has already demonstrated a propensity for serious, sustained and intractable conflict with established human interests.

Again thank you for the opportunity to contribute to this important process.

Sincerely,



Jim Thorpe  
JT Land and Cattle, LLC  
HCR 67 Box 14  
Newkirk, NM 88431  
505-868-4686

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DEC 31 2007

December 31, 2007

USFWS-NMESFO

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

Subject: My Comments about the Proposed Rule Change to the Mexican Gray Wolf Program.

Dear Sir:

I would like to comment on the wolf program but first you need to understand about the wolf program significant and negative effects to our ranch operation

My wife and I have borne the brunt and the significant costs of the wolf program. It has been an undue burden to us as a family and as a livestock producer. Furthermore, it has destroyed our investment-backed expectations in our ranch operation. The wolves ate so many of our cattle that we could no longer stay in business because we had n return on our investment to cover our operational costs in the future.

We have spelled out these financial damages to Dr. Tuggle in our letter (dated Feb. '06), when we requested that FS conduct a *Takings Implication Assessment (TIA)*. As describe in our letter, these financial damages destroyed our ability to hold on to our ranch. We were forced to live with other families. It as not relocation but we were homeless. Hence, we feel strongly that in this EIS for rule change that FWS has an obligation to conduct a TIA to determine if your propose rule change alternatives and the current "no action" alternative has takings implications upon our livestock, other personal property, our due process rights, and upon our financial future –as it relates to the wolf program.

We further recommend that you assess the impacts to poor communities, minority populations that occupy the current wolf area and the proposed expansion area.

In regards t the damages that the wolf program has forced upon us, as forest grazing allottees, it appears to be unfair to require me to use the national forest, a financial and contractual legal agreement with the Forest Service. It places undue burden upon our family ranch because the FWS wolf program is able to destroy what I pay for while the wolf program pays nothing without being held accountable for the financial damages that their program has done to me, a legitimate forest grazing allottee.

Carcass removal will not work because it will only increase the wolf depredation on livestock. The reason that carcass removal will increase cattle losses is that you will in effect remove the wolf's food source, his most recent livestock kill. Since, the wolf/wolves can no longer feed off of the dead livestock; they will kill another livestock in its place, especially since the wolf finds its easiest prey, being cattle.



When you were supplemental feeding horse meat to the Aspen Pack last summer, it appeared to reduce the livestock depredation. But a soon as you stooped supplemental feeding in the fall, during elk season, the wolf depredation non cattle increased substantially. It obviously requires more scientific assessment by an third party established agriculture research university, namely, New Mexico University.

In expanding the wolf boundaries, FWS is spreading the problems related to the wolf program. You also will significantly heighten the polarization between rural communities and agricultural producers. There are reasonable ways to reduce the hardships you are placing on small rural communities and families. But the problem solving needs to start by mitigating the negative and costly impacts that we have described to FWS.

As the FWS releases more wolves, it is only going to increase the problems with habituated wolves that routinely hang around our place as well as our neighbors. As you release more wolves, it reduces the habitat availability for wolf habitat, creating added and cumulative impacts on the current wolf packs in our area and in other areas. Until you can come to grips and provide real ad fair relief to the undue effects, the wolf population should go down than up. It would send a public message that you recognize that there is harm and that you will invoke a moratorium on no more wolf releases until effective remedies are put into place.

Last but not least s the need to address the repeated problems by your agencies in not following AMOC, especially SOP 13. FWS appears to be is out of compliance with due process and the Administrative Procedures Act by supporting and participating in the AMOC and IFT staff who did not remove the Aspen Pack problem wolf/wolves – SOP 13 is very clear about the 3 strike rule: a wolf must be removed when it depredates on 3 livestock. It was 7 strikes before the agency acted. It appears to be arbitrary and capricious to allow your wolves to destroy 3 claves, let's say, at \$500/each. Now you are destroying our personal property to the tune of 7 times \$500/ea. to equal a loss of \$3,500.

I hope you can provide remedies to the current program and to address these major problems in any revision.

Respectfully submitted,



Don Jones  
HC 30 Box 476  
Winston, NM 87943

1105 Ocotillo Canyon  
Carlsbad, NM  
88220  
31 December 2007

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USFWS-NMESFO

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

ATTN: MEXICAN GRAY WOLF NEPA SCOPING

Dear Mr. Millsap:

I am submitting these comments in regards to the request for input from the public regarding the Mexican Gray Wolf NEPA Scoping process. I have long been interested in Mexican Gray Wolves and have followed closely the program since their release in the late 1990's. While I applaud the efforts of many people I am overall deeply disappointed at how this program has been managed. I feel the current program will ultimately end in failure unless drastic changes are made.

For success, I think a number of changes need to be made. The U. S. Fish and Wildlife Service has bent over backwards now for almost 10 years to make the ranchers and Catron County officials happy but as should be obvious, that is never going to happen. I think it is time to do what is right for this program, for the Mexican Wolves and the large number of people state and nation wide who support this program and quit worrying about a small group of people who are NEVER going to come around, listen to reason, or make their decisions based on actual science.

I think the following need to be made part of the plan to recover Mexican Wolves and these changes need to be implemented immediately.

1. **The Recovery Plan**, if in fact it can be called that, needs to be revised immediately. Over a quarter of century has passed since the plan has been amended. Obviously the people who put this together 25 years ago didn't have all the answers (or anticipate future problems) and it needs to be changed. These changes need to reflect a new program. Any change in current rules which would not further protect wolves should not be implemented before completion of a new and appropriate recovery plan.

2. **Stop the killing and removal of wolves.** Except under the most extreme of circumstances, no further wolves should be removed from the wild. There should be less "take" of wolves and in instances where ranchers may be involved in promoting the take, the

wolves should be left on the ground. The recent incident with the Miller family should not be tolerated.

**3. Number of wolves in the wild.** Currently there is a perceived cap on the number of wolves in the wild. The number in the wild has, of course, never come close to that number of "at least 100 Mexican Gray Wolves." This cap should be removed and the goal should be to develop a viable, self-sustaining population, regardless of number. 100 should be a bare minimum.

**4. Resolve rancher-wolf conflicts.** Outside of Catron County it is widely perceived that US Fish and Wildlife is doing the bidding of Catron County ranchers and politicians. These ranchers are largely grazing on PUBLIC lands and it is the general feeling of the PUBLIC that wolves belong in the Gila. Ranchers should either be required to remove dead livestock or cover them with lime to make them unpalatable for wolves and other predators. Ranchers who do not do this should be fined, have their stocking rates reduced or lose their public grazing rights.

**5. Restrictions in wolf dispersal and movements should be removed.** Currently, Mexican Wolves must stay within the boundaries of the Blue Range Wolf Recovery Area (BRWRA). This area includes the Gila National Forest and the adjacent Apache National Forest in Arizona. There should be no exclusion of geographic areas from occupation by wolves. Wolves cannot read maps. Capturing wolves that stray from BRWRA and are then re-released back to the Blue Range only disrupts packs that may already be established there. Wolves should be allowed to determine their own range until recovery goals are met.

**6. Initial release areas should be expanded.** Currently captive wolves are allowed to be released only in the Blue Range of Arizona. How does this make sense? Releasing these animals into an area which may already be occupied by the maximum number of wolves will only disrupt established packs. Releases should be allowed in the Gila also. This will allow the US Fish and Wildlife Service to release genetically appropriate individuals which will help the releases to be successful. Other areas should be considered for release including the Chiricahuas in SE Arizona, Otero Mesa in southern NM, and Big Bend National Park in TX.

**7. Population status must be changed.** Currently the wolf population is classified as "experimental, non-essential." This should be changed to "experimental, **essential**." This will give the wolves on the ground more protection and a better chance at success. In the long-term, Mexican Wolves cannot be saved by keeping them in captivity. They must be released into areas where they have a chance and where there is a management plan that gives them a chance at success. Changing the population status acknowledges this and gives them the protection they must have.

**8. Future options should not be excluded.** Any changes in the rules should not include any provision that would limit future options outside of the current BRWRA-Gila areas. For this program to succeed, options must be left open.

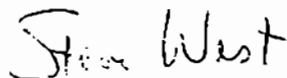
9. **Prosecutions.** To date, has a single person been arrested or convicted of the many mysterious wolf deaths? How many have been found shot or have outright disappeared? What has happened in regard to the disappearance of the Durango pack? Threats were made against that group by ranchers and county officials and then they disappear. Is anything at all being done to stop this? Additional law enforcement must be placed in the area or this type of illegal killing is only going to kill and if the agency continues to show weakness in this regard, it will accelerate.

I attended the meeting in Alamogordo on December 31, 2007. I know a lot of work went into planning the meeting but I was overall disappointed in the process. The first thing was the brochure asking for input. This is the one with John Slown's address on one of the panels. The perception of many of us is that U.S. Fish and Wildlife Service is spending too much time trying to make Catron County ranchers and local officials happy (which isn't going to happen) instead of worrying about the success of this program. The brochure is one more example. There are two pictures on the brochure, one of a mountain meadow, the other of a cowboy working cattle next to (in ?) a corral. Why was there not even a picture of a wolf on the brochure? I thought that was what this meeting and process was largely about. Or is it really about cowboys and cows since that is what is pictured?

I know that the personnel attending the meeting didn't go there to fight with people but they put up with a lot of disrespect from some of the anti-wolf individuals attending. Basic questions were frequently asked (such as the cost of the program) which were not answered. I would have thought this would be a pretty basic question that should be anticipated. Individuals raised ridiculous concerns (such as the rumor about releasing wolves into the Sacramento Mountains) and nothing was said which defused the question. It was almost as if the personnel attending the meeting had been told to take abuse. Being weak in this regard at a meeting like this is only going to energize the anti-wolf faction and mean more abuse for Federal personnel at future meetings and dead wolves on the ground. Many Federal employees have dedicated their lives and careers to a successful wolf program. I cannot imagine how frustrating all of this must be to them.

In summary, I think the U. S. Fish and Wildlife Service should develop a plan which puts wolves first. Current management and direction does not do that. This is about wolves first and foremost, in developing a successful plan and a viable population of Mexican Wolves.

Sincerely,



Steve West  
[wthrsswift@carlsbadnm.com](mailto:wthrsswift@carlsbadnm.com)  
[lobo@swwmail.net](mailto:lobo@swwmail.net)

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](mailto:R2FWE_AL@fws.gov)

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DEC 31 2007

USFWS-NMESFO

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:

We would like to comment on the above referenced scoping process. As residents of New Mexico, I am writing to express the following concerns I have with these proposed amendments.

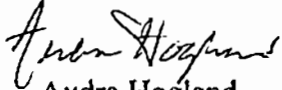
- The issue of human safety must be addressed. Wolves that stay around homes and communities threatening children, harming pets and killing livestock should not be allowed to remain in the program and should be dealt with immediately.
- The continue feeding of wolves by U>S> Fish and Wildlife Service and Game and Fish personnel should not be allowed to persist. Although it may alleviate a short term problem, it in turn only creates a bigger and longer problem with habituation.
- 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.
- 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.
- 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.

Boundaries should not be expanded until this program can show some type of success nor should it be considered at this time.

- Carcass removal by livestock operations is not a realistic option, nor can its effects be proven at this time.
- The removal of problem wolves through lethal means needs to remain an option.
- Diseases carried by wolves that are harmful to humans and domestic livestock need to be addressed.
- 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,



Audra Hogland  
PO Box 120  
Socorro, NM 87801  
(505)835-0811

Michaelann Nelson  
16 Gaddis Rd  
Sandia Park, NM 87047  
(505) 286-7847  
[MNelson1@unm.edu](mailto:MNelson1@unm.edu)

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DEC 31 2007

USFWS-NMESFO

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

December 18, 2007

Dear Mr Slown,

I'm writing to you regarding the Fish and Wildlife Service's rule change process regarding the reintroduction of Mexican Gray Wolves to our public lands. As a current doctoral candidate at University of New Mexico in environmental literature, I support the Fish and Wildlife Service's reintroduction program and any efforts to sustain and enhance this program. As a Lobo, I feel that sustaining and increasing this link in our ecosystem, is not only important for a healthy and viable ecosystem, but as an important symbol of pride to the citizens of our state and its largest university institution.

In the early to mid- part of the twentieth century, Fish and Wildlife Service felt it was necessary to eradicate "predator" species to facilitate ranching. The rise of ecology gave us a better understanding of the important role the Mexican Gray Wolf plays in a healthy ecosystem. Wolves are a vital and important link to maintaining a healthy ecosystem. The successes of the wolf reintroduction program in Yellowstone National Park can be replicated here. If the successful model from Yellowstone National Park plays out in the Southwest, we can expect to accrue broad ecological benefits. In Yellowstone, wolves have kept elk from eating streamside vegetation in places with poor visibility, such as canyon bends, where wolves might sneak up on them. As a result, more cottonwoods and other trees are growing to maturity, the beaver are returning, and the beaver dams are extending the benefits of this uptake in biological productivity to a wider area. The increased riparian habitat has led to a resurgence of birds. Fish are also benefiting.

While I realize that ranchers are concerned about the treat to their livestock, wolves are mainly preying on elk, some on deer, fewer on cattle. They're helping ensure that the stronger and more alert elk and deer survive and pass on their genes. Most wolf attempts to capture prey end up unsuccessful for the wolves. There's a real winnowing process at play. It is important to consider the needs of many, over the needs of a few. Additionally, several nonprofit organizations have developed livestock reimbursement programs for ranchers who demonstrate their loss as a result of reintroduced wolves. This eases their hardship of financial loss.

There's so much we don't understand about how ecosystems operate. But keeping things natural to the extent we can is always the best bet. Putting the Mexican gray wolf back on the land was one of the best bets our society ever made. It was and is the right thing to do.

Sincerely,



Michaelann Nelson

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DEC 31 2007

USFWS-NMESFO

Sent by Certified Mail, Return Receipt Requested  
No. 7007 0220 0003 7610 0193

P. O. Box 7  
Mayhill NM 88339  
December 29, 2007

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

Dear Mr. Millsap:

Re: U. S. Fish & Wildlife Service Wolf Program

I strongly oppose the Fish and Wildlife Service's Wolf program, the release of any additional wolves into the rural areas of the United States and especially New Mexico including Otero County.

Wolves are one of the most viscous predators in the world.

I receive electronic messages on a continual basis about numerous problems that rural residents, especially in the western states, are having with wolves.

There are numerous examples of attacks by wolves on a wide variety of wildlife species, domesticated livestock, pets and humans, Attachment 1.

Residents in the Gila area of New Mexico, where there are a number of wolves, routinely carry firearms when they leave their residences including feeding their livestock near their homes because of the presence of wolves.

The Gila parents have begun to build wolf proof shelters where their children can safely stay while waiting for the school bus or for their parents when they return from school.

There are numerous reports about wolves attacking livestock. In addition, there are a number of reports where ranchers find their livestock have been killed, but there are very few remains to identify the animal as the wolves have eaten almost everything including the hide and bones.

I realize that some of the Animal Rights Activist Organizations brag about reimbursing ranchers for any livestock that have been killed by wolves.

However, experience has proven that it is extremely difficult to scientifically prove a wolf kill in order to obtain any but a minimal reimbursement.

On December 14, 2007 I received an electronic message about a Grizzly Bear on the Montana/Wyoming border that was being chased by wolves, was hit by a log truck and killed. Attachment 2.

The classified Mexican Gray Wolves that have been released in the Gila are endangered only because the Fish & Wildlife Service was able to successfully provide information for the classification.

I have received a number of opinions that the information provided by the Fish & Wildlife Service to have the Mexican Gray Wolf listed as endangered was faulty.

At an El Lobo Forum that was held at New Mexico State University, Las Cruces, several years ago, a number of "Wolf Experts" stated that all wolves are genetically the same. The wolves are called different names according to where they are located, i.e. Mexican Gray Wolf, Timber Wolf, Alaskan Wolf, etc.



When the discussions first started about re-introducing wolves in New Mexico, a contingent of individuals who were promoting the wolves, attended a New Mexico State Game Commission meeting.

During the discussions, Game Commissioner Mr. George Ortega, stated, "You folks have to realize that this country isn't like it was even 50 years ago much less how it was when native wolves were in this area."

When I was riding the school bus from my residence in Mayhill to Cloudcroft NM in the early 1940s, a distance of 18 miles, there were only 17 residences near the highway with school children being picked up at only 12 of those locations.

How many houses are there now between Mayhill and Cloudcroft?

Without doing some extensive research the number is unknown, but many more than 17.

However, there are now 20 sub-divisions between Mayhill and Cloudcroft and the number of houses in each sub-division is unknown. However, one can count more than 17 houses, in several of the sub-divisions, from the highway and that doesn't include the houses that can't be seen from the highway.

In addition, there are numerous individual dwellings that aren't in sub-divisions.

Proponents of the wolf re-introduction program state that wolves are needed to balance the ecosystems.

However, the last known wild wolf in Otero County was killed by government trapper Mr. Ellis Wright many years ago. The exact date is unknown.

Mr. Wright died in 1977 at 83 years of age and the wolf was killed at least 25 years prior to this death and probably much longer.

Therefore, Otero County has been without wolves for at least 50 years and there is no proof that the ecosystem has been degraded.

In fact the livestock industry in Otero County has flourished and is one of the main contributors to the economic health of the county.

In a December 20, 2007 press release, New Mexico U. S. Congressman Stevan Pearce stated in part and I quote:

"I am disappointed more of my colleagues could not see the wisdom in eliminating an unsuccessful, ineffective program that has not only failed to produce results, but also threatens the lives and livelihoods of New Mexicans.

We have people in the second district that can't check their mail without taking a pistol to the mailbox for fear of being attacked.

Since its inception, the Mexican gray wolf reentry program has spent more than \$14 million on the release of just 59 wolves – at a cost of over \$237,000. per wolf.

In the meantime we shouldn't be wasting more and more resources on a failed program that puts people's lives and livelihoods in danger.

Pearce believes the time has come to concede that wolves cannot successfully be reintroduced into New Mexico and is disappointed Congress has not yet reached that view."

Attachment 3.

I am in total agreement with Congressman Pearce.

Sincerely,

*R L Posey*  
R L Posey

**R L and Patty Posey**

---

**From:** "Patty Posey" <lollie@pvtnetworks.net>  
**To:** "R L & Patty Posey" <lollie@pvtn.net>  
**Sent:** Monday, December 31, 2007 9:54 AM  
**Attach:** ATT0000111.jpg; ATT0000222.jpg; ATT0000333.jpg; ATT0000444.jpg; ATT0000555.jpg;  
ATT0000666.jpg; ATT0000777.jpg; ATT0000888.jpg; ATT0000999.jpg; ATT000101010.jpg  
**Subject:** Fw: Big Bear

----- Original Message -----

**From:** Patty Posey  
**To:** R L & Patty Posey  
**Sent:** Friday, December 14, 2007 8:12 AM  
**Subject:** Fw: Big Bear

----- Original Message -----

**From:** John Komula  
**To:** jkomula  
**Sent:** Friday, December 14, 2007 6:42 AM  
**Subject:** FW: Big Bear

This bear was killed about 45 minutes from Wausau. Can't believe how huge that bear was!!!

Deb

That's a lot of bears\*\*\*!

Open attached pictures. > > This Bear was hit on  
Hwy 64 between Merrill and Medford. It was being chased by a pack of wolfs and ran

*RL+P, Pg 1*

**R L and Patty Posey**

---

**From:** "Patty Posey" <lollie@pvtnetworks.net>  
**To:** "R L & Patty Posey" <lollie@pvt.net>  
**Sent:** Monday, December 31, 2007 9:51 AM  
**Attach:** Findings- Wolf Interaction Investigator.doc  
**Subject:** Fw: Wolf Investigative Report

----- Original Message -----

**From:** Carolyn Gillespie  
**To:** Carolyn Gillespie  
**Sent:** Saturday, December 15, 2007 11:46 AM  
**Subject:** Wolf Investigative Report

Members,

Attached is the two year report of Jess Carey's work. Please note that this report does not include the losses in previous years. If those actual numbers were known, it would be devastating to the Wolf Recovery Project. When you open the document, open it on "normal view." Please print this 6 page report so that you can refer to it in the future. Try to read this report with "rural citizen eyes." City people don't see the same report we see. They are unconcerned about losses of cats and dogs, or visits to homes and ranchers. They ignore the fact that this information shows the danger to young children in the yard. One young adolescent girl wears a six shooter on her hip when doing chores in the yard or riding her horse. She is well trained in how to defend herself, since she lost her other horse earlier in the year to wolves. Thank heaven that she was not riding the horse, or in the coral grooming him when six (6) wolves attacked.

When I travel the state and county roads around Catron County, I see moms and dads waiting at school bus stops, because it just isn't safe to leave the children to wait for the bus, or to walk home after being left at the bus stop. We are presently building "cages" to protect our children while they wait for the buses. We cannot understand why the city people accuse of us being "hysterical, unbalanced, unnecessarily alarmed, etc." The rhetoric of city folks is insanity to those of us living in the wolf country. New Mexico is not the only state where wolves are terrorizing citizens.

In this report, notice the "unknown" causes of death. Wildlife Services will not acknowledge a "stress death" of cattle. When wolves chase cattle just for fun, or the mother is trying to protect a calf that is being eaten alive, she will develop pneumonia from the stress. She will die very soon and her death will be "unknown," because the rancher cannot leave his ranch to carry a dead animal to the vet and then pay for a costly autopsy. Even then, Wildlife Services will not acknowledge the possibility of a wolf encounter as the cause of the pneumonia.

If any of you wish to express your gratitude to Jess for his work, he can be reached at 575-533-6668. You can also contact the Catron County Commission by mail at:  
 Catron County Commission  
 c/o Postmaster  
 Reserve, NM 87830

Thanks a bunch Jess, what would we all do without your dedication and hard work?

Cari Gillespie, Secretary  
 NM Rural American Alliance

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No virus found in this incoming message.

Checked by AVG Free Edition.

Version: 7.5.516 / Virus Database: 269.17.12/1202 - Release Date: 12/29/2007 1:27 PM

*ATC 1. P. 1*

12/31/2007



**HAT RANCH, INC.**

P.O. BOX 149  
ALAMOGORDO, NEW MEXICO 88311  
(505) 963-2505 (HDQTS.)  
(505) 963-2435

DON L. (BEBO) LEE  
JEAN E. LEE

December 31, 2007

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

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

page 2

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.

Page 3

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

Sincerely,

A handwritten signature in black ink, appearing to read "Don L. Lee". The signature is written in a cursive style with a large initial "D" and "L".

Don L. Lee

HAT RANCH, INC.

DRAWER 149  
ALAMOGORDO, NEW MEXICO 88310  
(505) 963-2505 (HDQTS.)  
(505) 963-2435  
Fax (505) 963-2306

CHARLIE T. L  
BEBO LEE

Date 12/31/07

TO: Name of Individual Brian Wilson

Name of Firm Wild Fish & Wildlife

Telephone

Fax Telephone 505 946-2542

FROM Don Lee

Telephone 505 963-2505

Number of pages being sent 2 with cover

Address top left corner of this  
page.





**HAT RANCH, INC.**

DRAWER 149  
ALAMOGORDO, NEW MEXICO 88310  
(505) 983-2505

DON T. LEE  
CHARLIE T. LEE  
BEBO LEE

December 31, 2007

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

Re: Notice of Scoping Meetings & Intent to Prepare Environmental Impact Statement & Socio-Economic Assessment for the Proposes 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 for the scoping comments on the above captioned rule.

1. The economic impact to our operation would increase significantly if the recovery area were to be expanded. An increase of two more employees at a minimal to be continuously inspecting the livestock. I would need two additional vehicles. That would also have to include the gas, tires and general upkeep expense, etc. Additional housing for the extra employees would be necessary. Conservatively speaking, that would cost an approximate \$140,360.00 the first year. This would be an extreme burden that an individual should not have to bear for the majority.
2. Amending the 10(J) rule to allow a property owner to have a wolf proof fence erected around his property if he chooses at the expense of The United States Fish and Wildlife Service and before any wolves are allowed out of the primary recovery area.

Sincerely,

Don L. Lee  
President

December 31, 2007

Dear Mr. Slown,

It is my opinion, given much research, that the introduction of the wolf anywhere in the 48 contiguous states is ill advised at this time:

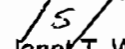
1. It is a fact that wolves are not endangered on planet Earth.
2. The Mexican Grey wolf is genetically identical to other wolves.
3. FWS employees are, in my judgment, more concerned about job security than the actual welfare of the flora and fauna that the American taxpayers are paying you to protect.
4. Releasing wolves, or any plant, animal, insect, in an area that does not contain the necessary resources for that living thing to survive is tantamount to murder.
5. Released wolves are necessarily habituated to man and therefore at a distinct disadvantage when it comes to avoidance of man.

USFWS should nix all plans for introduction of the wolf until science favors doing so. Trying to advance agendas without legitimate reasons only weakens USFWS credibility. To use an appropriate cliché, I believe that USFWS is "crying wolf". You may find a place and time where you need the support, financially and otherwise, of your employer, the U.S. taxpayer. What will you do then?

I co-administer a site entitled Otero Residents Forum which has focused on wolf introduction. Over 2400 visits have been logged to the site from all over the world. The site too voluminous to include here but I request that it be included as public input. The address is:

<http://www.oteroresidentsforum.blogspot.com>

Sincerely,

  
Janet T. White  
P.O. Box 49  
Alamogordo, NM 88311-0049  
575.921-1760

Cc: Congressman Stevan Pearce  
Otero Residents Forum

SHARON ARMijo  
CLERK - PO Box 197  
(505) 533-6400

SARAH MERKLEIN  
TREASURER - PO Box 407  
(505) 533-6384

IRENE RAEI  
ASSESSOR - PO Box 416  
(505) 533-6577

SHAWN C. MENGES  
SHERIFF - PO Box 467  
(505) 533-6222

WILFORD ESTRADA  
PROBATE JUDGE

STATE OF NEW MEXICO

# CATRON COUNTY

RESERVE, NEW MEXICO 87830

LOYD ALLEN LAMBERT  
COMMISSIONER, DISTRICT NO. 1

ED WEHRHEIM  
COMMISSIONER, DISTRICT NO. 2

HUGH B. MCKEEN  
COMMISSIONER, DISTRICT NO. 3

COMMISSION OFFICE  
P.O. Box 507 - (505) 533-6423  
FAX (505) 533-6433

BILL AYMAR  
COUNTY MANAGER

December 31, 2007

RECEIVED

DEC 31 2007

U.S. FISH AND WILDLIFE SERVICE

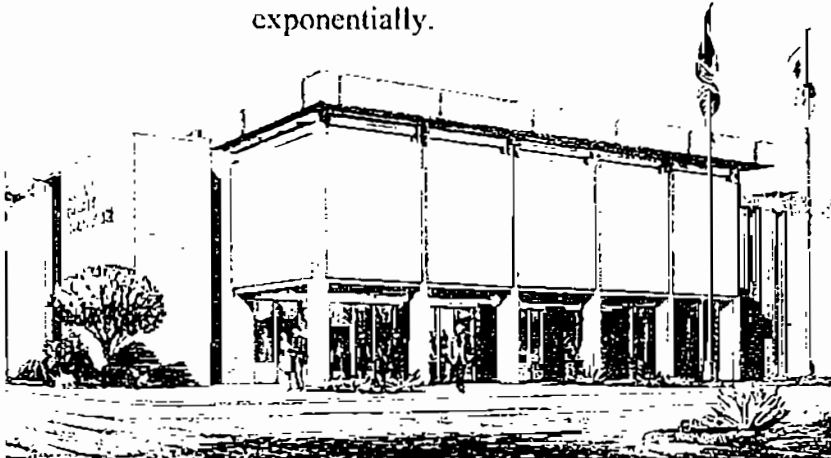
Brian Millsap, State Administrator, U.S. Fish and Wildlife Service  
New Mexico Ecological Services Field Office  
2105 Osuna, NE  
Albuquerque New Mexico 87113

**Subject: Transmittal of Catron County Commission's Scoping Comments Regarding the Mexican Gray Wolf Environmental Impact Statement and Proposed Rule Change**

Dear Sir:

The Catron County Commission submits the following scoping comments for the Mexican wolf Environmental Impact Statement (EIS) and proposed changes to the Mexican Wolf Nonessential Experimental Population (NEP) final rule. Our comments are based on several major areas of concern, which include but are not limited to the following:

- **Impacts on the safety, health and welfare of our families and particularly our children.** Catron County has investigated and confirmed direct wolf-human conflicts and habituated wolf sightings near children and families (see exhibit D). These have caused significant safety concerns for parents, schools, and community leaders.
- **Impacts on Economic stability,** particularly in the livestock industry which represents the county's largest business sector. For example, Catron County livestock producers have lost cattle, horses, etc. valued at \$500,000 dollars (see exhibit C).
- **Fiscal impacts on the Federal government.** The Mexican Wolf program has cost Federal agencies at least \$14 million dollars to date. An expansion of direct release areas and a generally broader geographical management area could drive that cost up exponentially.



- **Fiscal impacts on Catron County government.** As a protection measure to citizens, we have been forced to implement our own wolf management program, the cost for which has consumed a significant percentage of our total General Fund budget.
- **Ecological impacts on Forest indicator species.** It is suspected that Mexican wolf packs have impacted elk and deer populations in our area; study of actual ungulate population numbers is imperative. As these ungulates are major indicator species of forest health; initial indications of a lowering of population may constitute an indication that the natural system is out of balance. Additionally, adequate numbers of wild ungulates provides an important mechanism for keeping fire fuels in check, reducing the potential for catastrophic fire ignition.
- **Impacts on intergovernmental relations.** The failure of the U.S. Fish and Wildlife Service (FWS) to coordinate scoping and rule change activities with the Catron County Government worsens already strained relations created by the agency's failure to establish true management coordination. Given that the Catron County government and its residents have extensive direct experience with and are clearly impacted on a daily basis by both wild and habituated Mexican wolves, failure to utilize them as cooperators renders the intergovernmental adaptive management program meaningless. The burden of this failure is borne by the people and animals (wolves, livestock, pets, ungulate wildlife) of Catron County and adjacent areas.
- **Conflicts with or failure to address Catron County plans and ordinances.** On April 18, 2007, Catron County adopted Amended Ordinance 001-2007 (attached) that governs Mexican Wolf Management within our boundaries. This ordinance, in our view, is not respected or reflected in current federal Mexican wolf management plans or rules.

In addition, we adopted Catron County Ordinance 002-93: *An Ordinance Revising The Catron County Environmental Planning & Review Process & Repealing Ordinance No. 006-92*, which requires cooperation and consultation with Catron County Government and calls for mitigation of adverse impacts. This ordinance, in our view, is not being fully complied with.

Finally, the Catron County Comprehensive Plan, adopted in 1992, clearly outlines quality of life, endangered species, and wildlife issues that FWS must consider in its own plan and program development. These are not reflected in the current NEP final rule or the action/mitigation measures of its accompanying Environmental Impact Statement.

- **Impacts on social stability.** The mere presence of Mexican wolves (a non-essential experimental population), the harassment of people, pets and livestock by Mexican wolves, and the confirmed cases of injury to pets and livestock has severely impacted the social stability of Catron County communities, neighborhoods, and residents. Recent studies (J. Thal, PhD, J Martin, MD - see Exhibit B), point to the following adverse effects: Insomnia, bed wetting, nightmares, chronic fear, clinical depression, borderline personality disorder, Post Traumatic Stress Disorder (PTSD). Program expansion through changes to the NEP final rule would, in the view of the Catron County Government, increase these impacts.

- **Impacts on civil rights.** According to an Initial Assessment Report (IAR) prepared by Catron County in 2007, the U.S. Fish and Wildlife Service failed to follow due process: *“The USFWS and the Mexican Wolf Adaptive Management Oversight Committee’s early notice public policy was not honored by the USFWS or the interagency field team. Those interviewed stated that agency staff often identify wolf locations that are old, inaccurate, or both.”*

The issue of agency due process compliance continues to be a problem expressed by those negatively affected by wolves; the issues include early notice, destruction of personal property, and not following AMOC rules. Because of these recurring problems, as part of the EIS, FWS should conduct a Civil Rights Impact Analysis, pursuant to US Department of Interior civil rights impact directive, utilizing the USDA, US Forest Service Civil Rights Impact Analysis methodology.

- **Impacts on Environmental Justice.** The above-referenced IAR (2007) notes a failure of FWS to comply with Executive Order 12898 on Environmental Justice requirements, inasmuch as FWS has not assessed the effects of this federal program on protected classes (ranching operations owned or operated by women and minorities).
- **Impacts on Property Rights.** A summary of these impacts is outlined in Exhibit C, and includes loss of livestock, domestic pets, and other personal property, loss of real property, and failure to provide fair compensation.
- **Impacts on Custom and Culture.** The custom and culture of Catron County has been severely damaged by the Mexican Wolf program. Expansion of the program through changes to the NEP final rule would increase the negative impact. These impacts include but are not limited to: loss or curtailment of ranching operations, family activities and gatherings on private property, hunting opportunities, wildlife viewing (particularly deer and elk), and outdoor activities (hiking, dispersed camping, etc.).

To address these areas of concern, we strongly urge you to consider and act on the following:

1. Each of these issue areas reflect significant and direct adverse impacts as a result of the NEP rule, proposed rule changes, and implementation of agency actions. The consequential costs of identified impacts expose AMOC members and lead agencies such as FWS to legal and insurance liabilities. Therefore, we strongly recommend that these costs be included in the Environmental Impact Statement and Socioeconomic Assessment for the proposed NEP Final Rule change. Further, we urge, pursuant to 40 CFR Parts 1500-1508 and Catron County Ordinance 006-92, that you work with us to identify and implement mitigation measures. Further, our IAR (see exhibit C) has identified mitigation issues that we ask you to include and analyze in the EIS, pursuant to 40 CFR Part 1506.
2. Due to the social costs of the Program, it is imperative that the *Environmental Impact Statement* be conducted at a scale and rigor that provides full disclosure to the public about the rate and magnitude of social, economic, cultural and distributional impacts. Refer to Exhibit A, section A, which highlights the socioeconomic factors that should be analyzed, along with the Environmental Justice, Takings Implications Assessment and

Fair Compensation factors that should be addressed.

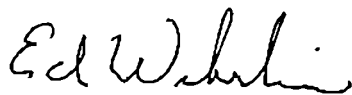
3. The Catron County Commission position is that the biological, economic and social carrying capacities to support Mexican wolf populations have been far exceeded. Therefore, future wolf releases should not occur in Catron County, and existing populations should be removed to allow communities and natural ecological systems (e.g. prey species populations in wilderness areas) to come back into balance, beginning with problem and/or habituated wolves.
4. The EIS that accompanied the current NEP final rule failed to conduct adequate impact assessments on the human environment or involve the County, pursuant to 40 CFR 1506.2 as a cooperating local government agency.

The purpose of involving other government entities (Catron County) is to reduce duplication of effort and gain "local" expertise for a more comprehensive assessment and full disclosure of environmental affects. Therefore, we formally request that you address these shortcomings by involving Catron County in the preparation of the EIS as a cooperating agency, pursuant to 40 CFR 1506.2. Further, we request your compliance with the process outlined in the August 7, 2007 Federal Register Notice (Volume 72, Number 1511, pp. 44065-44069) and commence coordination with Catron County as an affected local government partner.

The remainder of our comments and supporting exhibits, which are hereby incorporated as part of the above comments, are attached. These attachments more specifically address the issues related to the proposed rule changes that affect Catron County and its residents.

On behalf of the Catron County Commission, we urge your consideration and prompt attention to these comments for the relief of our rural communities, businesses and families.

Sincerely,



Ed Wehrheim, Chairman  
Catron County Commission

Attachment with supporting exhibits

- Catron County Commission Scoping Comments Regarding the Mexican Gray Wolf Environmental Impact Statement and NEP Final Rule Change
- Exhibit A: Methods for Conducting Socioeconomic Assessments, Environmental Justice Requirements, Takings Implication Assessment and Fair Compensation
- Exhibit B: Psychological Impacts to Families and Children

- Exhibit C: Catron County Initial Assessment Report (IAR): Assessment of the Economic, Social, Cultural and Distributional Impacts From the Non-Essential, Experimental Mexican Wolf Program Submitted to D. Ben Tuggle, Regional Director, US FS Submitted by: Catron County Commission February 2, 2007
- Exhibit D: Catron County Wolf Interaction Investigator Results of findings
- Exhibit E: Summary of Valerius Geist wolf documents
- Exhibit F: An assessment of risk to humans from Mexican Wolves in Catron County, New Mexico
- References

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

**Comments regarding the Reintroduction of the Mexican Gray Wolves Program:**

I have a great concern regarding the Mexican Gray Wolf reintroduction program because it defies good judgment and common sense. These animals are predators, and there were sound reasons to eradicate them from the wild in New Mexico.


These animals live by their predatory instincts. Therefore, animals including humans can be their prey. At the meeting in Alamogordo, it was emphasized that there is no documented evidence of the wolves attacking humans, but we must remember that they have been removed from the wild for many years which invalidates that claim. Wolves prey on all types of animals, and domesticated animals are easier prey than wild prey. This will result in a great loss to many people. The coyotes come in close to town, and people on the outskirts lose their pets to them. It will be no different or even worse with wolves.

We do NOT want this destructive animal imposed on us. Those that want the wolves released should consider building an enclosure that is secure enough to contain the wolves and permitting any that escape that designated area to be exterminated. This should be done in an area where there is not any objection to having the enclosure built.

New Mexico has a large proportion of federal lands that are used for various purposes. These lands are intermingled with private lands, towns, and cities. Prior purposes for using the federal lands should take precedence over someone's whims to want to alter the balance of nature which has already been done with the oryx and elk in our area. Both of these poor decisions do not need to be compounded with yet another unwelcome animal and particularly since it is a predator.

In conclusion, common sense would tell a person who understands the nature of the Mexican Gray Wolf that they should NOT be reintroduced into the wild in New Mexico. We do NOT want our lives altered by this poor decision. Fear for our safety, the safety of our animals, and the safety of commercial domesticated animals would alter our lives disastrously. Please use good judgment and common sense and do NOT impose the Mexican Gray Wolf predator in southern New Mexico.

Judyann Medeiros  
3350 Thunder Road  
Alamogordo, NM 88310





John Steiner  
USFWS  
2408 Camino N. E.  
Albuquerque, N.M. 87113

It is ridiculous to require "recovery" to allow our PUBLIC LANDS. It is worse to be driven away to it is our responsibility to make space for them now.

These wolves must be allowed access to good habitat whenever it occurs, not just within a bounded "recovery" area. It negates the idea of "recovery" to recapture and release pack animals- it breaks up their families and thwarts breeding and expansion- apparently the idea behind "recovery".

A way must be found to reconcile ranchers who use our public lands to co-existing with wolves. Our public lands are not ranchers' fiefdoms- they must share, and be aware of the privilege they enjoy thanks to us, the citizens. A compensation program for proven wolf-kills is a good thing, and already working. A plan for guard dogs might also help ranchers- some may be intractable, but most that I know truly love the mountains and forests where wolves used to roam, and want the landscape whole again.

Wolves cull the weak and sickly elk and deer, unlike humans, who take the biggest and strongest. Maybe wolves' eating habits would improve hunters' or users' trophies.

These wolves must be listed as "endangered" to insure that the "recovery" program truly is that- RECOVERY- not just an experiment. This is vital. The definition of "recovery" needs to be clarified- and the future of wolves should not be limited by any preconceptions about boundaries.

**Thanks for the chance to be heard.**

Gregory J. Steiner

334 OSO Ridge Route  
Grants N.M. 87020

Louis Montoya  
Montoya Sheep and Cattle  
1610 HWY 170  
La Plata NM 87418

John Slown  
State Administrator, US Fish and Wildlife Service  
New Mexico Ecological Services Field Office  
2105 Osuna, NE  
Albuquerque New Mexico 87113  
R2FWE\_AL@fws.gov

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

Dear Mr. Slown,

Thank you for the opportunity to comment on the Scoping process for the Mexican Wolf Rule change. There are issues that I feel need to be examined in the development of scoping issues. I live in the Mountainous four corners region of New Mexico, It would be impossible for us to dispose of carcasses due to lack of large equipment. Such a requirement would be punitive and destructive to our operation. Regardless of research findings, that show there is no correlation to carcasses and depredations, this program has chosen to make this a key issue in the scoping process. This decision will impact the success of, and management flexibility of small livestock producers rendering them incapable of compliance with impossible regulations. Carcass disposal is not always reasonable or possible. 1) Frozen ground will keep ranchers from burying carcasses possibly for months. 2) Ranches with low incomes may not own the equipment necessary to dispose of a carcass. 3) Remoteness and ruggedness of terrain may not lend to easy location or access to possible carcasses. It will burden livestock producers un-necessarily.

Boundary expansion should not be considered for our area. We feel there has already been too much impact to private lands in the current programs management. One of the major problems has been the translocation of problem wolves that go back to preying on livestock and have harmed people I know in the current reintroduction boundary. The program must stop the practice of re-using problem animals.

Removal of lethal control options would cause harm that would be too great to the welfare of the communities and human element and affected public. This management scheme brings a disproportionate burden to local livestock producers and local residents suffering habituated wolf presence. Currently lethal control of livestock depredating wolves has been curtailed to the detriment of small livestock producers like me.

The program managers should be required to move wolves that den in livestock occupied pastures allowing them to stay and raise pups in livestock herds has proven hazardous to livestock, and has led to lethal wolf control. Wolves that choose a den near deeded land or occupied livestock pastures should be removed to a more remote area. The burden of forcing the livestock producer to remove his livestock is too great and may interfere with other agency grazing and conservation practices to a burdensome extent.

Participating in the scoping meetings has been difficult and much of the information available as educational material is rife with inconsistencies and misinformation. For instance, one poster made a claim of wolves living off 75% elk and only 4% cattle, this can't be true. I have heard this statistic came from a scat analysis done in Arizona in 2002 in an area that had no cattle present. This is not information that should be presented to the public as fact it is misleading the public with false information.

The program should allow ranchers on federal grazing allotments to use lethal methods to protect their cattle or their other animals when wolves are caught in the act of attacking livestock or dogs, cattle are still private property regardless of what kind of land they occupy.

Homeowners should also be allowed to shoot wolves that come to private residences and become a nuisance. Children must be protected from habituation behavior.

*Louis Montoya*

Attn:

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

Enclosed 3 pages including cover sheet.

From:

J. D. Coupland  
Jeanette Coupland  
P.O. Box 8  
Pinon NM 88344

December , 2007

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

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

Sincerely,

*J. D. Coupland*  
*Jeanette Coupland*  
*P.O. Box 8*  
*Piñon NM 88344*

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

Attn. Mexican Gray Wolf NEPA Scoping

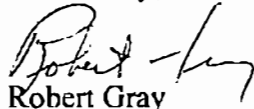
Dear Sir:

I strongly urge the U.S. Fish and Wildlife Service to fulfill its mandate under the ESA to effect the full recovery of the endangered Mexican gray wolf by removing restrictions on the natural movements of this species within and without the Blue Range Wolf Recovery Area. This species needs the classification of "endangered" for protection and the area for initial release must include the whole of the BRWRA.

Livestock-wolf conflicts are best resolved by removing livestock from the BRWRA. The presence of livestock has a strongly negative affect on the ecology of the Area (watershed degradation, introduction of exotic species and increased wildfire damage) and a decidedly negative economic impact overall. A healthy predatory population of wolves has been shown to improve the biologic mix of our western forests and attracts tourism, with its low impact economic benefits amounting to an order of magnitude greater than the supposed economic benefits of grazing on public lands.

In this modern era, it is unseemly and downright un-American for welfare recipients (grazing lease holders) to impose their self-serving priorities above that of the greater public good.

Yours truly,



Robert Gray  
PO Box 1570  
Elephant Butte, NM 87935

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- Sent
- Deleted
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- Leon Op Ed...
- NYT cartoons
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 Invalid e-mail addresses: "r2fwe\_al@fws.gov?subject=mexican gray wolf nepa scoping".

From:



To:

Cc:

Bcc:

Subject: Wolf Reintroduction

Show plain text

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Studies have shown that reintroducing predators into their natural habitat benefits the ecology of the area.

The supposed danger of wolves attacking humans is always brought up. There has never been an attack on a human by a wolf.

The other point is their attack on livestock. There are guidelines for ranchers to follow to minimize the attraction of wolves to cattle, but they are not always followed or enforced.

Public lands belong to the PUBLIC at large, not any one particular segment of the population such as ranchers, miners or loggers. The deciding factor should be what the majority of the public want.

Grazing on public lands was a depression era program to assist ranchers. The depression has been over for 60 plus years. I think the majority of the public want livestock off public lands and the natural OCCUPANTS RESTORED TO THEM.

Leon Logan  
416 W. Mesa Vista Ave  
Tucumcari, N.M. 88401

- Contacts**  
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  - Debbie Dudley
  - Debbie LaGrana
  - Don Miller
  - Frank Newsom
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  - info@cyclepage:
  - jane jones
  - Jay Goldston
  - JOE PAGE

**RECEIVED**  
 DEC 31 2007  
 USFWS-NMESFO



Ray Auge  
PO Box 1152  
Elephant Butte, NM 87935-1152  
Telephone # 505-238-6941  
29 December 2007

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

Sir:

First, I would like to say that I am rather disappointed after driving 280 miles to attend one of your wolf meetings, especially learning upon arrival that public comments were not on the agenda and that the meeting was only to better the wolf recovery program. Due to other prior commitments I was unable to attend any other meeting closer to my home.

--

As you can probably tell I am opposed to the release of this vicious predator back into the "wild". I feel all of the wolf recovery specialists and biologists, including you, should be charged with child endangerment and animal cruelty. To release these vicious predators loose on elk, deer, and cattle to be torn apart and eaten while still alive constitutes cruelty. You may say this is nature, but chicken and dog fighting are illegal and that is also a natural instinct, but we still outlaw it.

Wolves are not going to stay in one place and are going to move to other areas to terrorize inhabitants. Therefore, a child or children cannot play in outlying areas without fear of the wolf. That is child endangerment, plain and simple. I think our constitution says we have the right to freedom without fear and oppression and you, our government, is creating fear

Wolves are an "endangered species" according to the environmental groups. I disagree since they are easily bred and grown at the Sevilleta game refuge.( I thought a refuge was an area used to protect wildlife, not to raise predators which destroy the same. Question: if you have an accidental wolf release from these pens, do you contact all people within a 50 mile radius to be on the lookout for them and to use caution?

A better solution would be for the USF&W to raise these "endangered animals", domesticate them and sell them to the wolf enthusiasts with very strict guidelines, i.e.: spay, neuter and special pens. Heaven forbid, you might even make a profit!

I understand the wolf recovery program is a very lucrative program for the USF&W, a very expensive program for the general public, and very impressive to the recovery

Bureaucrats, of whom there are many.

The agenda of many wolf activists and environmentalists is to ban ALL of the general public and remove all grazing of any domestic animals from ALL public lands and some private lands. We can at least eat elk, deer and cattle. Dogs and wolves are not on most people's diets.

Wilderness ecology is supposed to be better with the wolf but the same can be accomplished with proper fencing and hunting periods at a heck of a lot less money than the present project. You folks in government seem to forget who is paying for all of these debacles. We are tired of paying for fanatical whims.

Yours truly,



Ray Auge

RA/cj

Cc: Senator Pete Domenici  
Senator Jeff Bingaman  
Representative Steve Pearce

## How to Submit Comments

Written comments accompanied by name and address will become part of the formal record of the scoping process. While you may provide your ideas verbally during the meeting, we want to make sure your input is formally captured in your own words. You may submit written comments in three ways:

- Fill out the comment portion of this brochure and leave it in the drop box
- Take the brochure with you and return it by mail
- Provide comments via e-mail. For your convenience, you can do that here at the computer station, or visit [www.mexicanowolves.org](http://www.mexicanowolves.org)
- Faxed comments may be sent to (505) 346-2542

Please note: In order to be considered part of the formal record, your comments must include your name and address. Comments may be submitted through December 31, 2007.

Before including your address, phone number, e-mail address, or other personal information in your comment, you should be aware that your entire comment--including your personal information--may be made publicly available at any time. While you can ask us in your comment to withhold your personal information from public review, we cannot guarantee that we will be able to do so.

## Comments:

THE SOLUTION IS SIMPLE;  
GIVE THE MONIES TO THE  
PEOPLE WHO WANT THEM,


THEIR BACKYARDS AND  
THEIR PETS, LET THEM

RISK THEIR KIDS.

AND THEY SHOULD BE  
READY TO DONATE \$ 500  
TO THE PROGRAM EVERY

TIME A WOLF GETS  
HUNGRY.

THIS PROCESS GIVES  
YOU THEIR NAMES AND  
ADDRESSES.



Name: CHARLENE MCCARTY

Street: Box 487

City, State, Zip: RESERVE, N.M.

87830

Tape closed with address on outside, and add a stamp.

DO NOT STAPLE  
Thank you for your input!

December 27, 2007

Joe Delk  
PO Box 879  
Mesilla Park, NM 88047  
(575) 644-3082  
[jdelk525@yahoo.com](mailto:jdelk525@yahoo.com)

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DEC 31 2007

USFWS-NMESFO

Brian Milsap  
c/o John Slown  
US Fish and Wildlife Service  
New Mexico Ecological Services Field Office  
2105 Osuna, NE  
Albuquerque New Mexico 87113  
[R2FWE\\_AL@fws.gov](mailto:R2FWE_AL@fws.gov)

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

Dear Mr. Milsap,

I am compelled by principle to state that I have been opposed to the reintroduction of the Mexican Wolf from the very beginning of the program. I do recognize that there is federal law that mandates the program and in the spirit of cooperation I do have comments that I believe would help minimize the socio-economic impacts on the communities and livestock producers within the recovery area and in the long term would have an overall beneficial effect on the wolf recovery program.

***Issues Related to the Scope of the NEP***

***(a) Current management stipulations that require wolves that establish home ranges outside the Blue Range Wolf Recovery Area (BRWRA) to be removed and re-released into the BRWRA or taken into captivity. This stipulation stemmed from the intention in the 1998 NEP final rule that wolves would not be reestablished throughout the entire Mexican Wolf Experimental Population Area (MWEPA), but only within the BRWRA, which is a sub area of the MWEPA. However, analysis indicates that removals for boundary violations due to wolves dispersing or establishing territories outside the BRWRA are not conducive to achieving the reintroduction project objective of "reestablishing a viable, self-sustaining population of at least 100 Mexican (grey) wolves" (U.S. Fish and Wildlife Service 1982, p. 23). In other words, change in this aspect of the 1998 NEP final rule would provide the Service with the authority to allow wolves to establish territories outside the boundaries of the BRWRA.***

The USFWS has not demonstrated to my satisfaction that they have either the resources or expertise to expand the program beyond the current recovery area boundaries.

Dr. Benjamin Tuggle, Regional Director of the United States Fish and Wildlife Service (USFWS) told us in Silver City, New Mexico on April 18, 2007 that the USFWS was underfunded and understaffed to manage the program at its current status. The New Mexico Department of Game and Fish (NMDG&F), Director, Bruce Thompson told us at the New Mexico State Game Commission meeting in Gallup, N.M. in July, 2007 that the NMDG&F did not have resources allocated in their budget to adequately address issues stemming from problem wolves or to properly assess the impact of wolves on elk in the Gila. Additionally, Wildlife Services had two hundred thousand dollars (\$200,000) stripped from their budget in the 2007 New Mexico Legislative Session.

So, please explain to me how the two main agencies entrusted with the responsibility of reintroducing the Mexican Wolf into Blue Range Wolf Recovery Area and managing the program to mitigate the impacts on livestock producers and rural communities here in New Mexico, can justify the expansion of the program by allowing wolves to establish themselves in areas outside existing recovery area without adequate funding and manpower to properly manage the program.

Also, how can we ask the already over-worked, underfunded and understaffed Wildlife Service's people to adequately deal with wolf depredations while leaving livestock producers in other areas of the state without their badly needed services?

Given your lack of ability to track and verify un-collared wolves, you cannot even give an accurate count on the actual number of wolves in the BRWRA. How can you propose to manage an even larger area?

In the original EIS, impacts on livestock were to be minimal. In actuality, there has been tremendous impact to the individual ranching operations in the reintroduction area. We have seen several ranches so severely impacted that they were forced out of business and had to sub-divide their deeded land to recoup at least part of their investment. What data has the U.S. Fish & Wildlife Service (FWS) accumulated to determine the actual impacts on the ranching industry not only the loss of livestock, but added expenses and physiological effects of having to deal with the stress of depredating wolves?

Livestock producers outside the current reintroduction area are strongly opposed to boundary expansion fearing the carnage they have seen their fellow producers suffer within that area. However, there is little fairness in forcing those who are attempting to maintain livestock operations or live within the current reintroduction area to continue to suffer losses at the same or enhanced level.

How can you justify expanding the program to benefit wolf reintroduction while it would undoubtedly expand the impacts onto the ranching community as well? Would it not be better to make adjustments to the scope of the program to fit the existing BRWRA rather than to enlarge and expand the scope of the program into a larger area that you have neither the resources nor adequate personnel to manage without reasonable and probable expectations of conflict with people and their property?

The program has failed within the current reintroduction area, as evidenced by the number of wolves that have been repeatedly recaptured, lethally removed and not survived for

various other reasons in addition to the tremendous impacts on local families, communities and governments. How can you justify expanding the boundary without addressing these issues?

Also, until there is an effective livestock compensation/interdiction/incentive program that addresses replacement costs and lost production administered locally, there should not be any expansion of the recovery area.

***(b) Current management stipulations allow for initial Mexican gray wolf releases from captivity only into the primary recovery zone of the BRWRA. Management experience has demonstrated that this stipulation in the 1998 NEPA final rule sets impractical limits on available release sites and wolves that can be released into the secondary recovery zone, limits the Mexican Gray Wolf Reintroduction Project's (Project) ability to address genetic issues, and results in a misperception that the secondary recovery zone is composed largely of "problem" animals that have been translocated to the secondary zone after management removal due to livestock depredation events. In other words, a change in this aspect of the 1998 NEP final rule would possibly provide the Service the authority to release Mexican gray wolves from the captive breeding population into New Mexico.***

There is no "misperception" that the secondary recovery zone is composed largely of 'problem' animals." The FWS's own news release on March 21, 2000 states: "An EA of The translocation of previously released Mexican gray wolves within the BRWRA for management purposes was completed February 10, 2000." What are the "management purposes" for which wolves have been translocated? While livestock depredation is most certainly not the only "management" issue involved, nuisance behavior such as habituation around communities, schools and homes as well as depredation on pets and domestic animals appear to be the only other "management" purposes that have been utilized in translocation.

Translocations or releases of known problem wolves (habituated or those with any history of livestock predation) should not ever be allowed. They should either find space in a captive breeding facility, zoo or euthanize these animals. If not, they will impact decisions regarding future removals because there is nowhere to put "bad wolves". There is also no known way to turn "bad wolves" into "good wolves." Another alternative would be to use these animals to research rabies vaccination programs that are much needed within the program.

However, releasing "fresh" or inexperienced wolves may not be a solution either. The wolves released in Arizona initially were fresh or inexperienced, yet were translocated to New Mexico for "management purposes." What were the management purposes? Are management agencies habituating these animals to humans by continued feeding of road killed animals, carnivore logs (horse meat from Mexican processing plants) or by trapping and handling in human settings then transporting them in camper shelled vehicles that cannot help but permeate human sent (see video Adobe Ranch <http://wolfcrossing.org/category/wolf-videos/>)? The affect of these management techniques must be analyzed in the overall context of wolf behavior.

I remember when the Durango pair was released directly into the Gila Wilderness on or about April 20, 2007. The female was within days of whelping yet it took only two days for the pair to travel forty or fifty miles to territory they were already familiar with (Adobe Ranch) and the rest is history. How many taxpayer dollars were spent as a result of this ill-advised decision? The USFWS certainly demonstrated their lack of judgment with the Durango fiasco. How can we trust the agency learned anything from this experience?

Only when the USFWS demonstrates that they can adequately manage the program under the current rules should we consider allowing them any latitude to broaden the scope of the program with regard to release sites.

***(c) The definition of the White Sands Missile Range, which is within the MWEPA, as the White Sands Wolf Recovery Area. However, the White Sands Wolf Recovery Area is not of sufficient size nor does it have sufficient prey density to function as an independent recovery area.***

The issue here is obvious and I agree if there is no prey base and the area is not sufficient in size, there should not be any releases even considered. The size of WSMR would never contain the wolves nor is there enough of a prey base to keep them within the boundaries of WSMR.

This same logic needs to be applied throughout the entire recovery area.

***d) Limited provisions for private individuals to "harass" wolves engaged in nuisance behavior or livestock depredation, or which are attacking domestic pets on private, public, or Tribal lands. Current provisions in the 1998 NEP final rule allow for "opportunistic, noninjurious harassment" of wolves by private individuals; that is, individuals are not allowed to harass wolves in such a manner as to even potentially result in bodily injury or death of a Mexican gray wolf. Management experience in the BRWRA, as well as the Northern Rocky Mountain DPS gray wolf recovery program, suggests that a variety of harassment methods could provide an effective deterrent to problem Mexican gray wolf behavior, as well as increasing public acceptance of Mexican gray wolf recovery. All possible alternatives and remedies need to be explored.***

I firmly believe that if the wolf reintroduction program is to ever see any measure of success, owners of property within any area where wolves are present should have the right to protect their property without fear of reprisal.

There should be an allowance in the rule for property owners or their agents to take (including kill or injure) any wolf engaged in the act of stalking, killing, wounding or biting livestock or pets either on private property or on federally administered lands allotted for grazing anywhere within the Mexican Wolf Experimental Population Area including the designated wolf recovery areas.

The 10(J) rule should be amended to authorize harassment of 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 they feel

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 showing signs of being desensitized to human encounters.

The amendment should also include the harassing or humanely dispatching of wolves by the USFWS or other 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.

The USFWS must cease all management practices which habituate these animals to humans! Habituation of the wolves to humans is the single most deterring factor in the acceptance of the program by the impacted community.

Mitigation of the false and misleading information that has been issued as public education during so called scoping meetings including the power point presentation as well as the contents of posters that contain faulty information on wolf removals, livestock, and depredations.

Another misconception that is prevalent in the USFWS and the environmental organizations is that wolves have never been documented killing anyone in North America. This is a false hood that is misleading the public and needs to be stopped. Wolves have been documented all over the world killing people and eating them ([http://en.wikipedia.org/wiki/List\\_of\\_fatal\\_wolf\\_attacks](http://en.wikipedia.org/wiki/List_of_fatal_wolf_attacks)). North America has its own documented cases. The recent killing of Kenton Carnegie and in many old news reports (see [http://www.aws.vcn.com/wolf\\_attacks\\_on\\_humans.html](http://www.aws.vcn.com/wolf_attacks_on_humans.html)), these falsehood statements need to be stopped.

The practice of utilizing helicopters and planes to dispense with depredating wolves must NOT be eliminated. This country is too large and rugged to lose this ability to

address or capture problem wolves. Elimination of these tools would hamper any ability to a quick and effective technique to wolf removals. In actuality it would probably increase the number of depredations that wolves are already doing.

Implementation of 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 needs to be established.

Takings implications and 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. In addition to losses for livestock, compensation should be given for losses of pets.



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

There is great need for the rules to distinguish the difference between "killing" and "eating". Only a percentage of actual wolf kills are consumed by wolves. I know of no available data on what that percentage might be but there is considerable evidence available in the Gila of many livestock and elk that were killed by wolves in either a "spree killing" or "joy killing" activity and were never consumed. To lead the public to believe that wolves only kill what they need for sustenance is misleading at best.

And finally we believe that more intensive and widespread data should be collected on wolf diet using scat studies throughout the recovery area rather than one point and time that leads to incorrect conclusions that wolves' diets mostly consist of elk (75%) as noted on a pie chart in the scoping and educational posters. This study is out of date and far too small to legitimately make this claim. There is also reason to believe that this data was collected in areas where livestock were not present during the analysis. Any NEPA analysis should provide for better information collection in a new rule.

***(e) Current provisions in the 1998 NEP final rule that do not allow for "take" of wolves in the act of attacking domestic dogs on private or Tribal Trust lands. However, domestic dog injuries and mortalities have occurred within the BRWRA due to interactions between wolves and dogs, primarily near people's homes. Lack of take authority in instances where take may have been warranted has resulted in substantial negative impacts on some local residents and visitors to the BRWRA.***

An allowance in the rule to add a provision in the NEP to include domestic dogs in the "take" provisions of the rules is absolutely necessary. Livestock owners or their agents would be allowed to take (including kill or injure) any wolf engaged in the act of stalking, killing, wounding, or biting livestock or domestic dogs on federally administered lands (see change in definitions below) anywhere within the Mexican Wolf Experimental Population Area, including within the designated wolf recovery areas.

***(f) Among other issues, the need to clarify definitions of: "breeding pair," "depredation incident," and "thresholds for permanent removal." In addition, there is a need to identify other possible impediments to establishing wolves, such as the livestock carcass management and disposal issue identified in the 3-year review of the project (Paquet et al. 2001, p. 69). The authors of this report recommended that the Service "require livestock operators on public land to take some responsibility for***

*carcass management/disposal to reduce the likelihood that wolves become habituated to feeding on livestock." In other words, if a new final rule is promulgated that incorporates this recommendation from the 3-year review, it may result in redefining "nuisance wolves" and "problem wolves" so as to exclude animals that scavenge on the carcasses of livestock that died of non-wolf causes.*

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

**BREEDING PAIR:** considered 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). We would also like to include any pets; dogs, cats, riding horses, etc. to this definition.

**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 (LAWFULLY) PRESENT LIVESTOCK:** should be defined as livestock occurring within the boundaries of a recognized grazing allotment where the owner has beneficial use water rights on federal land.

This would also include any occasion whereby livestock owned by one person may be unintentionally present on his neighbors' allotment. This is a common occurrence within any ranching community and should not ever be considered as illegally present livestock.

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 goal posts associated with management of problem behavior.

Full investigation into the efficacy of livestock carcass removal including the increased cost to livestock operations needs to be conducted. If this is to be considered, then the removal of carcass's killed by wolves and the associated costs also need to be determined. Ed Bangs with USFWS has been widely quoted as saying *"The idea that wolves eat a dead cow, think beef tastes great, and then start attacking cattle is mythology as eating carrion and killing prey is two totally different wolf behaviors. Wolves often scavenge all they can. Normal range practice out here makes it nearly impossible to find and bury [or blow up for human safety concerns as they do for G. bears issues and livestock carcasses along trails] every carcass so livestock carcass disposal is within 'normal' and traditional livestock husbandry practices, feeding on livestock carcasses is a very different thing than attacking livestock- one doesn't necessarily lead to the other. (See additional studies at <http://wolfcrossing.org/wolf-studies-scat-prey-habitation-disease-more-to-come/>)*

### ***Issues Related to Evaluation of the Environmental Impacts***

***We are seeking comments on the identification of direct, indirect, beneficial, and adverse effects that might be caused by amendment of the 1998 NEP final rule that established the current NEP of Mexican gray wolf. You may wish to consider the following issues when providing comments:***

**(a) Impacts on floodplains, wetlands, wild and scenic rivers, or ecologically sensitive areas;**

The effects of wolves on watersheds spread of disease on domestic and wild animal populations needs to be addressed. Many diseases need to be taken into consideration. Rabies is currently the utmost concern. Given the incidence of grey fox rabies in Catron County, we would like to know the vaccination status of the released wolves. It is our understanding that there are no licensed vaccines approved for use in wolves, so it is not legal to vaccinate wolves with rabies vaccine in New Mexico.

There are several zoonotic diseases of concern, especially those that are shed in feces and urine. Some of these zoonotics would be sarcocystosis, echinococcus, ascariasis, cysticercosis and neospora caninum. These are parasites passed in feces that can cause disease in both humans and livestock. Neospora causes abortion in cattle and wolves have been shown to be an intermediate host to this parasite. Other viral and bacterial diseases of concern would be distemper, adenovirus, brucellosis and leptospira. Leptospirosis and brucellosis are both a concern for humans and livestock. Some of these parasites and diseases can be transmitted to pets then on to their owners. How does USFWS intend to address these concerns?

How has the introduction of the wolf impacted the migration of elk within the recovery area? Has it improved riparian areas as documented in Yellowstone?

**(b) Impacts on park lands and cultural or historic resources;**

A full disclosure of 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. We ask that a specific economic analysis on ranches that are being harmed be conducted and that individual rancher and at the most the county level economic impact be evaluated. That the cumulative impacts wolf reintroduction and recovery is analyzed using local, county developed information on jobs, poverty and economics.

An analysis that is national or regional in scope fails to depict the real impacts of wolf reintroduction.

Livestock production in the release and recovery area cannot be negatively affected by this program.

**(c) Impacts on human health and safety;**

Improvement of wolf monitoring to insure that residents in the release and recovery areas are informed when wolves are in close proximity is badly needed. There is a definite need to facilitate documentation of predation on livestock also.

The 10(J) rule should clearly document through appropriate mapping that people reside in current and potential wolf habitat. The general public has been feed misinformation on this account and a misconception has resulted that people do not inhabit wolf release and recovery areas.

An analysis of wolf occupancy of lands where domestic livestock are present, homes where children reside, and where domestic animals may contract a parasite or disease and spread it to humans or where wolves may directly deposit infectious material near residences needs to be conducted.

**(d) Impacts on air, soil, and water;**

An analysis of problems associated with epizootic disease carried by wolves and potentially carried in wolf feces needs to be done. The potential effects of these diseases on people, domestic animals including pets and working dogs, and other wildlife should be evaluated in the new EIS.

How has the reintroduction of wolves negatively impacted family ranches, putting them out of business and forcing them to subdivide their private property affecting the air, soil, and water in wolf recovery area?

**(e) Impacts on prime agricultural lands;**

Other than the obvious impact of wolves depredating on livestock, how are wolves impacting elk herds and what impacts are those herds having on agricultural lands within and outside the boundary areas? NMDGF is currently working on a model to determine some of these impacts. The data collected for this model is only one year worth of data and by no means gives us enough information on elk/wolf interactions. Data should also be collected from impacted ranchers and outfitters in the impacted areas. This is an integral part of wolf management and must be addressed in the EIS.

Again, I am very concerned with the impact the wolf reintroduction program is having on Wildlife Services. Their limited resources and funding is already affecting individuals across the state. The fact that they are not being fully funded to participate in the wolf program is causing hardship in other counties that are not in wolf country due to the fact that WS is pulling resources and staff to deal with wolf depredations when needed. There is a desperate need to fully fund WS for this wolf program.

Again, how is the subdivision of ranches, the loss of county taxes generated from the loss of livestock from these ranches affecting agriculture lands in the wolf recovery areas?

**(f) Impacts to other species of wildlife, including other endangered or threatened species;**

I believe that to release any habituated animal into the wild with any expectation that that animal will adapt into an ecosystem, without impacting that ecosystem in a negative manner, will only undermine the true intent of the program and cause a disruption in the natural order of things.

**(g) Disproportionately high and adverse impacts on minority and low income populations;**

This program is having a disproportionately high and adverse impact on minority's and low income populations within the Mexican wolf recovery area. Research has showed that Catron County is one of the poorest in the nation. Any hardship, including wolves depredating on livestock affects the ability for many of producers to make a living. How many ranchers have been put out of business due to the reintroduction of Mexican wolves? This needs to be determined, and any denial that this is actually occurring needs to be brought to the forefront of these serious issues. Is it not required in NEPA that these determinations be made?

**(h) Any other potential or socioeconomic effects;**

Livestock kills as a result of wolf management rather than grazing cycles must be properly analyzed. Currently the IFT and other managers use subjective and speculative information to validate increased depredation problems. An example is the claim made in the scoping information education posters that a year round grazing causes more livestock depredation. Where is your scientific proof of this statement? Please provide us with documentation backing up that statement.

We would like to stress that the USFWS needs to commit to maintain the 10(J) status of the Mexican wolf program and add common sense approaches to managing problem wolves that are causing an economic burden on our producers in the MWEPA. SOP 13 needs to be kept and improved upon to help mitigate problem wolves. Arbitrarily assigning a strike to one wolf in a pack is not solving matters, but only making them worse. If a pack of wolves is involved in a depredation they are already becoming habituated. To arbitrarily pick one of them as the culprit does nothing to help the program. Given the overpopulation problems you are having in breeding facilities there is no excuse in trying to keep problem wolves on the ground. You have an adequate supply of them to release that are not habituated livestock killers.

Improved lethal and non-lethal control techniques needs to be established to help facilitate an improved program for wolf recovery.

We would also request that a study be incorporated to social study the impact the Mexican wolf recovery program has had to the children in the MWEPA. Given the recent psychological testimonies of local children, lock downs of public schools and the current erecting of bus cages to protect and give children a sense of protection from habituated wolves, we think that this needs to be added to this process.

**(i) Any potential conflicts with other Federal, State, local, or Tribal environmental laws or requirements.**

Has the USFWS consulted with any of the Native American Tribes within the MWEPA? It is our understanding that the tribes (Navajo's) have not had any interaction with USFWS. Where is the consultation that is required by NEPA? Consultation with the tribes need to take place including but not limited to; Navajo Nation (including Alamo, Ramah, and Tohajiilee), Laguna Pueblo, Acoma Pueblo, Mescalero Apaches, Isleta Pueblo, Zuni Pueblo, and I would include these because of their close proximity to MWEPA; Sandia Pueblo, San Felipe Pueblo, Santa Ana Pueblo, Zia Pueblo, Jemez, Cochiti Pueblo, Santo Domingo Pueblo, and Tesuque Pueblo.

The NMDGF is currently trying to manage their own little wolf program in NM. They need to coordinate with the USFWS and quit doubling efforts and ideas that have already been given before as well as during the scoping process (see NMDGF Concept Statement). Many of these concepts are unacceptable to our producers and should not even be given any consideration.

Finally, on April 18, 2007 in Silver City, New Mexico, Dr. Tuggle admitted that the USFWS is understaffed and underfunded to properly manage the wolf reintroduction program and when asked what recovery should look like, he admitted that he did not know what recovery would look like only that it was his job to reintroduce wolves in the southwest.

I submit that this is unacceptable. An issue which must be included in the consideration of the rule change is whether or not the program is even feasible here in the southwest given what we have learned to date. We are ten years into the program and somewhere between \$15,000,000 and \$20,000,000 with only a fraction of the planned 100 wolves on the ground. We are experiencing severe habituation of wolves causing extreme conflict with people and communities resulting in great consternation between the agencies and the impacted communities.

Under the National Environmental Policy Act (NEPA), the alternatives analysis is the "heart" of the document. According to the courts, an agency must consider alternatives, even if they are not within the agency's jurisdiction or are not authorized by enabling legislation. Thus, as required by such case law, one legal and reasonable option to this process should be the termination of the program. This must be a viable alternative to be considered in the EIS.

Thank you for your time and the opportunity to provide input into the scoping process. We look forward to your timely responses to our questions and suggestions.

Respectfully,

A handwritten signature in black ink that reads "Joe Delk". The signature is fluid and cursive, with a large initial "J" and "D".

Joe Delk

cc:

Senator Pete V. Domenici  
Senator Jeff Bingaman  
Congressman Steve Pearce  
Congresswoman Heather Wilson  
Congressman Tom Udall  
Governor Bill Richardson

RECEIVED

DEC 31 2007

USFWS-NMESFO

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 fuzziest 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.



Mr. Brian Milsap, 12/27/07, p.2

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.

Mr. Brian Milsap, 12/27/07, p.3

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.

**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.

Mr. Brian Milsap, 12/27/07, p.4

**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.

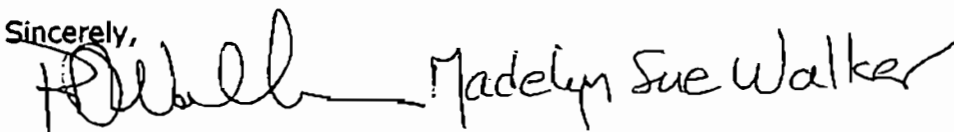
16. Implementation a federally funded pilot program aimed at compensation and interdiction to be run by ranching interests who are the experts in the field of livestock depredation causes and interdictions.

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 read "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

The logo for Sunshine Wells, featuring the words "SUNSHINE WELLS" in a stylized, white, serif font against a black rectangular background.

**Gadcom, Inc.**  
12710 Lucca Road SW  
Deming, NM 88030

PHONE: 505-546-9242  
FAX: 505-546-0696  
www.sunshinewells.com

Brian Millsap, State Administrator  
US Fish and Wildlife Service  
NM Ecological Services jField Office  
2105 Osuna NE  
Albuquerque, NM 87113

Dear Mr. Millsap:

I am writing to ask that you put an immediate end to removing wolves from the wild (trapping or shooting) until population goals are reached.

Since the current recovery plan has not been updated for 25 years (since 1982) and contains no numerical goals for recovery, there is a real need for updating this plan. I think it's important that the Mexican wolf recovery plan take into consideration elements of conservation biology and have numerical targets for removing the wolf from the endangered species list.

Please also consider allowing direct release of wolves from the captive population into the Gila National Forest. Allow wolves to roam beyond the boundaries of the recovery area. Require livestock operators who lease public lands in the wolf recovery area to practice responsible husbandry practices such as disposal of carcasses, season (rather than year round) grazing, using penned calving areas, etc.

Finally, I would encourage you to promote better understanding of wolves through fact-based education programs, particularly in communities within the wolf recovery areas.

Thank you,

A handwritten signature in black ink that reads "Diana L. Bell".  
Diana L. Bell

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

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 Establishing a Nonessential Experimental Population of the Arizona and New Mexico Population of Gray Wolf ("Mexican Gray Wolf").**

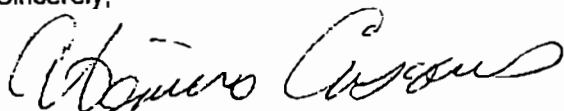
Dear Mr. Millsap:

I would like to comment on the above referenced scoping process. As a resident of New Mexico, I am writing to express the following concerns I have with these proposed amendments.

- The issue of human safety must be addressed. Wolves that stay around homes and communities threatening children, harming pets and killing livestock should not be allowed to remain in the program and must be dealt with immediately.
- The continued feeding of wolves by U.S. Fish and Wildlife Service and Game and Fish personnel should not be allowed to persist. Although it may alleviate a short term problem, it in turn only creates a longer term problem with habituation.
- 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.
- A compensation and interdiction program managed by livestock producers themselves needs to be created to address the real cost of the losses private individuals are experiencing.
- Boundaries should not be expanded until this program can show some type of success nor should it be considered at this time.
- Carcass removal by livestock operations is not a realistic option, nor can its affects be proven at this time.
- The removal of problem wolves through lethal means needs to remain an option.
- Diseases carried by wolves that are harmful to humans and domestic livestock needs to be addressed.
- 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,



*Abner Casanova*

*P. Box 685*

*Libra N. Mex*

*87013*

ZS 20 Los Lunas, NM  
LOS LUNAS, NM  
9/15

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

Fax (505) 346-2542  
Email: R2FWE\_AL@fws.gov

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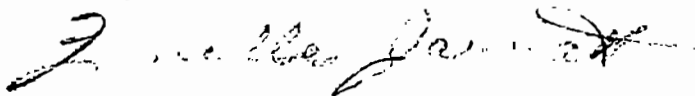
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Brian Millsap  
State Administrator  
U.S. Fish and Wildlife Service  
Ecological Services Field Office  
2105 Osuna NE  
Albuquerque, NM 87113

Fax (505) 346-2542  
Email: R2FWE\_AL@fws.gov

Beatriz Gonzales  
P.O. Box 248  
El Prado NM 87529  
*Beatriz Gonzales*  
505-751-1194

**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 Establishing a Nonessential Experimental Population of the Arizona and New Mexico Population of Gray Wolf ("Mexican Gray Wolf").**

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Sincerely,

P.O. Box 1284  
Tucson NM 85711

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

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 Establishing a Nonessential Experimental Population of the Arizona and New Mexico Population of Gray Wolf ("Mexican Gray Wolf").**

Dear Mr. Millsap:

*ask everyone to do & get involved.*  
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Sincerely,



P.O. Box 1380  
New Mexico  
87131

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

Fax (505) 346-2542  
Email: R2FWE\_AL@fws.gov

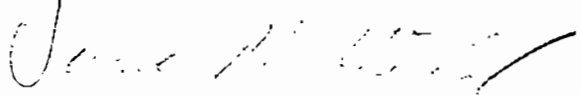
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Sincerely, 

P.O. Box 1284  
Taos NM 87571

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

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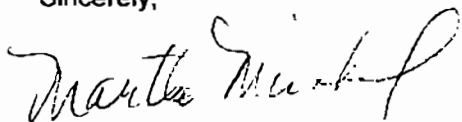
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Sincerely,

*John G. Wernick*

*P.O. Box 1284  
Tecos, NMex  
87571*

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

James B. Armstrong  
P.O. Box 204  
San Cristobal, NM  
87564

Fax (505) 346-2542  
Email: R2FWE\_AL@fws.gov

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James B. Armstrong

Box 6089  
Camino Serna  
TAOS, N.M. 87571

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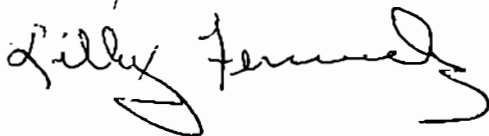
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*Trina B. Sandy*

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

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*Trina B. Sandy*  
2041 HWY 47 Los Lunas  
87031



Kenneth Wilder  
P.O. Box 248  
El Prado nm 87529

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*Wanda A. Rosauer*

*P.O. Box 82*

*San Cristobal, NM 87564*



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*Dianna Miller, OWNER  
The Double D Ranch  
P.O. Box 2823  
Tues NM 87571*

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El Prado NM 87529

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*Raymond A. Madson*  
P.O. Box 2426  
Ruidoso de Tees, NM 87557

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

*Cristina Trujillo Armstrong*  
*44 Carlitas Rd*  
*PO Box 206*  
*San Cristobal, NM 87564-0206*

Fax (505) 346-2542  
Email: R2FWE\_AL@fws.gov

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*Cristina Trujillo Armstrong*

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Tootsie Barnes

Tootsie Barnes  
121 N. Newby  
Bloomfield NM 87413.  
505-632-3757

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*Emmett W Cars*  
*P.O. Box 3*  
*Jemez Springs New Mex 87025*

LEANDRO GRIEGO  
P.O. Box 852  
Edenridge, N. M.  
87048

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**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 Establishing a Nonessential Experimental Population of the Arizona and New Mexico Population of Gray Wolf ("Mexican Gray Wolf").**

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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,



H. GERALD BOXBERGER  
P O Box 26  
CARSON, NM 87517

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

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Steve L. Romero  
Box 6087  
Camino Sereno  
Taos, NM 87571

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

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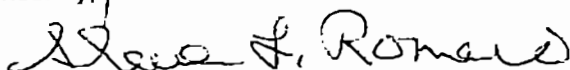
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Sincerely,

*Karen K. Boxberger*

*Karen K. Boxberger  
PO Box 26  
Carson NM 87517*

Monica Gonzales-Wilder  
PO Bx. 248  
El Prado, N.M. 87529

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

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Reynaldo Torres  
P.O. Box 76  
Arroyo Seco, NM 87514

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State Administrator  
U.S. Fish and Wildlife Service  
Ecological Services Field Office  
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HC R.6 2 1307 44  
R above. 44 747

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*Fambé Catherine Rice*

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

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121 N Newby  
Blomfield NM  
87413  
505-336-8368

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

Kathleen Chavez  
P.O. Box 911  
Springer, NM  
87747

Fax (505) 346-2542  
Email: R2FWE\_AL@fws.gov

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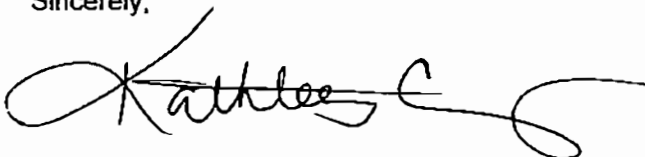
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FRANK RICE  
HCR 62 Box 44  
Raton, N.M. 87740

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

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Rita Beard  
HCR 60 Box 17  
Springer NM 87747

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

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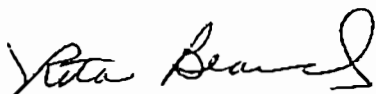
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Alfred Chavez  
Bx 911  
Springer NM 87747

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Sincerely,  (S.M. BUSH)

36 Bush Road  
Stead, NM 88415

2662 Hwy 47  
LOS ZUNAS, NM  
87031

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State Administrator  
U.S. Fish and Wildlife Service  
Ecological Services Field Office  
2105 Osuna NE  
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Dear Mr. Millsap:

I would like to comment on the above referenced scoping process. As a resident of New Mexico, I am writing to express the following concerns I have with these proposed amendments.

- The issue of human safety must be addressed. Wolves that stay around homes and communities threatening children, harming pets and killing livestock should not be allowed to remain in the program and must be dealt with immediately.
- The continued feeding of wolves by U.S. Fish and Wildlife Service and Game and Fish personnel should not be allowed to persist. Although it may alleviate a short term problem, it in turn only creates a longer term problem with habituation.
- 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.
- A compensation and interdiction program managed by livestock producers themselves needs to be created to address the real cost of the losses private individuals are experiencing.
- Boundaries should not be expanded until this program can show some type of success nor should it be considered at this time.
- Carcass removal by livestock operations is not a realistic option, nor can its affects be proven at this time.
- The removal of problem wolves through lethal means needs to remain an option.
- Diseases carried by wolves that are harmful to humans and domestic livestock needs to be addressed.
- 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,

*Michael O. E. Almon*

*Michael O. E. Almon*  
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*NA 82000*