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DEC 28 2007

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# Fax

USFWS  
 WORK PROGRAM  
 To: N.M. Ecological Field Office From: MORGAN GUST  
 Fax: 505-346-2542 Pages: 4 (inc course)  
 Phone: Date: 12/27/07  
 Re: MODIFYING WOLF CC:

- Urgent
- For Review
- Please Comment
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• Comments:

PLEASE CONFIRM RECEIPT VIA  
 505-535-4334  
 OR E-MAIL - ~~60797~~  
 MORGANMONT@YAHOO.COM

This message is intended only for the use of the individual addressed, and may contain privileged, confidential information exempt from disclosure under applicable law.

If you have received this communication in error, please notify us immediately by telephone, and return the original message to us via U.S. postal service. Thank you.

①

Three-Up Outfit  
P. O. Box 25  
Mule Creek, NM 88051  
575.535.4334

December 27, 2007

To: U. S. Fish and Wildlife Service  
Re: Suggestions for Modifying Mexican Wolf  
Reintroduction Program

Commenter: Morgan and Becky Gust  
Three-Up Outfit  
P. O. Box 25  
Mule Creek, NM 88051  
575.535.4334  
morganmont@yahoo.com

Basis for Comments: Largest individual landowner on Upper Eagle Creek, AZ; large  
deeded landowner and Forest Service grazing allotment permittee on the  
Gila National Forest, Mule Creek, NM.

1. Modify program to reduce opportunity for human-wolf interaction.
  - Keep 100 wolf experimental population goal but expand the primary recovery areas to include other, smaller, geographically dispersed, Primary and Secondary Recovery Areas in Arizona, New Mexico, Nevada, southern Colorado, and southern Utah.  
Examples include White Sands Missile Range, Grey Ranch area of Hidalgo County, San Mateo Mountains in New Mexico, Carson National Forest, Mesa Verde, San Juan Mountains, Arches/Canyon Lands/Kiaparowits Plateau, Sheldon National Wildlife Refuge, Escalante, Grand Canyon National Park, Kofa Game Range, Sierra Anca Mountains, and areas of the Coronado National Forest. New areas should be remote from one another, contain little or no private land, and should not be located near highways or major secondary roads.
  - Reduce the size of the Secondary Recovery Zone in the BRWRA by removing those areas that are close to significant amounts of deeded land, highways, and major secondary roads.
  - Greatly reduce (and eliminate where at all possible) "two-tracks", four-wheel drive, "hunting", unused logging and woodcutting, and other small roads and trails in Primary and Secondary Recovery Areas. Eliminate off-road and ATV vehicle use in National Forests and Primary and Secondary Recovery Areas.
  - Allow initial wolf releases only in a Primary Recovery Zone. Allow re-releases only in a Primary Recovery Zone.

②

-Wolves that establish home ranges outside of a Primary or Secondary Recovery Zone should not be recaptured or removed if the home range is not close to significant amounts of deeded land, highways, or major secondary roads.

These modifications will reduce the opportunity for human-wolf interaction by spreading the population over a much larger area, reduce the number of interactions, and spread the wolf impact over a much wider area but at a much reduced level.

2. Increase the opportunity for wild wolves to be truly wild.

- Reduce wolf handling by people to an absolute minimum – eliminate tagging, vaccinations, and collars. No supplemental feeding. Reduce or eliminate regular monitoring. Reduce necessity for recapture by allowing re-release only in Primary Recovery Areas and taking the steps set forth above.

- Allow “take” of wolves when attacking domestic animals, including dogs and horses, wherever those encounters may occur.

- Allow “take” of all wolves on deeded land.

- Allow private individuals to “harass” wolves engaged in nuisance behavior or livestock depredation on private, public or tribal lands.

- Reject suggestions to remove carcasses and frequent riding by ranchers. These activities will only increase human-wolf interaction.

These suggestions may seem extreme but, over time, they will greatly reduce human-wolf interaction by encouraging wolves to be wild and avoid humans. Mountain lions and bears live and thrive under these same rules and people accept them as part of nature.

These suggestions will also reduce the need for USFWS monitoring and recapture.

3. Give people an incentive to live with wolves.

- Increase peoples’ control and safety of the situation by allowing the activities in 2. above, (like they do with lions and bears).

- USFWS take over the responsibility for paying for livestock depredation.

Abandon specific identification of wolf kills and use a statistical based method of determining calf and cattle loss for reimbursement.

- Issue hunting permits to land owners and allotment permittees, which may be resold to hunters to eliminate problem wolves and excess wolf populations.

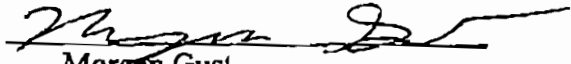
This has worked well with elk.

- Pay private landowners and allotment permittees a “use and acceptance fee” based upon the number of wolves that live in or regularly use their lands.

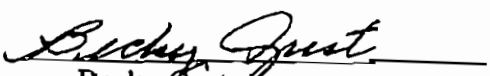
4. Reject all comments of the Defenders of Wildlife, Forest Guardians and other such groups whose primary agenda is elimination of cattle on public lands and elimination of Multiple Use. Their comments are aimed at making it extremely difficult or impossible to raise cattle (removal of carcasses, weekly riding, etc.), not at making the Wolf Reintroduction Program a success.

3

Please confirm you have our address and contact information in all appropriate data bases.

  
Morgan Gust

Three-Up Outfit

  
Becky Gust

  
Morgan Gust, Partner



no-reply@erulemaking.net  
10/22/2007 02:40 PM

To R2FWE\_AL@fws.gov  
cc  
bcc

Subject Public Submission

Please Do Not Reply This Email.

Public Comments on Endangered and Threatened Wildlife and Plants; 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``):=====

Title: Endangered and Threatened Wildlife and Plants; 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``)  
FR Document Number: E7-14626  
Legacy Document ID:  
RIN: 1018-AV40  
Publish Date: 08/07/2007 00:00:00  
Submitter Info:

First Name: Daryl  
Last Name: Gray  
Mailing Address: 31 Quail Hollow Rd.  
City: Tijeras  
Country: United States  
State or Province: NM  
Postal Code: 87059-6306  
Organization Name:

Comment Info: =====

General Comment: The wolves numbers are not where they need to be to sustain a healthy ecosystem. With only 58 wolves in the entire southwest and only 1300 wolves in the entire northern Rockies. Add to it the fact that the elk and caribou populations are at record numbers proves this fact. When alligators were hunted down and murdered in Florida almost to the brink of extinction there they were put on the endangered species list and now their numbers are over 1 million strong in Florida alone, how can any one with any knowledge of what a properly balanced ecosystem should be say that only 58 wolves in New Mexico and Arizona and 1300 wolves in the entire northern Rockies and 10,000 wolves in a state that is vast as Alaska is too much, that number is just a fraction of where the wolf populations should be to sustain a healthy ecosystem. The individual states themselves have already stated if the the wolves are de-listed they plan to eradicate them to the minimum acceptable level which is only 100 wolves in the northern states. So Alaska is like the last sanctuary for this beautiful animal to live with healthy numbers. What has happened to the days where nature decides

what wildlife populations should be and allowing nature to balance the ecosystem like it has been for millions of years instead of politicians who spread misleading, false information and try to use scare tactics about wolves to pass their agenda and decide how many should be allowed to live and die in this country and on this planet for that matter. Essentially man is trying to play God and in doing so creating more harm to this worlds fragile ecosystem and this topic concerning the wolves just goes to prove this theory. Acts of violence towards this beautiful species is an outrage and needs to be stopped immediately, Wolves are one of the most intelligent, precious, and deserving of life species there is, and humanity needs to start recognizing their importance in this world. These people are murdering an animal that's on the endangered species list and this is absolutely unacceptable. These animals are on this list for good reason. If they were to be de-listed it would allow for states like Idaho, Alaska, and Wyoming to implement their hate wolf laws and start eradicating their species and this MUST not be permitted. Look how many needless murders of wolves is taking place with them on the list, imagine what would happen if they were removed from the list. There are laws in place protecting these animals and laws need to be enforced. This is a disgrace to what this country stands for, allowing aerial gunners, hunters, and ranchers to break the law and murder these great animals due to loopholes in the laws, this is a travesty and it must be stopped immediately. This is one of the biggest reasons why the wolves must remain on the endangered species list with even more strict consequences to those murdering them. I can only pray humanity will awake from it's ignorance of these animals and start treating them with the love and respect they deserve. To try and use the excuse that the wolves predation of elk and caribou is to great but the fact is the northern Rockies states and Alaska are reporting 17-20% above the projected numbers for elk and caribou and their numbers are at record high levels according to the FWS. Furthermore, wolves make up for less than 1% of cattle deaths to ranchers herds and then they are compensated by Defenders of Wildlife and the US government for the cattle they do lose. Not to mention the huge \$70 million a year economical tourism boost the wolf watchers like myself bring to Alaska, and the northern Rockies states. It just seems like certain people are looking for any reason to hunt and kill them without care or consequence, what kind of world is this anyway where killing a wonderful family oriented species like the wolf is being allowed. It seems these people want take out their own personal frustrations out on the wolves. Hopefully we can help by standing up and being the voice for the wolves.

Thank you for your time and consideration.

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Brian Millsap, State Administrator  
NM Ecological Services Field Office  
2105 Osuna NE, Albuquerque, NM 87113

SEP 20 2007

WS-NM

Dear Sir:

I understand that you are soliciting "scoping" comments for a new EIS addressing wolf recovery. The wolves in NM and Arizona need to be able to roam beyond the artificial boundaries of the recovery area, and shooting and trapping must halt until recovery goals are met. I volunteer at a wolf research center in NM. I have observed that these wolves work well as a pack if they are kept together and if the mother teaches the pups to eat wild game instead of cattle. Ranchers should be required to practice responsible husbandry, including disposal of livestock carcasses, penned calving areas and predator hazing tactics. This program is expensive and it is the responsibility of the reintroduction program to either persuade the people in the area to work with them or to use another area for reintroduction --perhaps the area around the Grand Canyon.

Thank you for your asking for comments at this time.

Sincerely,

*Barbara Brandt 9/17/07*

Barbara Brandt  
P.O. Box 869  
Jamestown, NM, 87347

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SEP 25 2007

US-NMESC



"Nancy Kaminski"  
<kaminski\_nancy@hotmail.com>  
m>

09/25/2007 11:51 AM

To R2FWE\_AL@fws.gov  
cc kaminskinancy@hotmail.com

bcc

Subject Scoping

Mexican wolves would be better able to recover if we allowed them the freedoms listed below.

- 1 The wolves need the boundaries removed. Allow wolves to set up territory outside the Blue Range Recovery Area.
- 2 Direct release wolves into New Mexico.
- 3 Amend SOP 13 so that wolves who have scavenged on dead cows cannot be removed for depredations on cattle after being habituated to eating beef by the failure to remove cow carcasses from wolf territory.
- 4 Remove White Sands Missile Range from possible recovery areas for the Mexican wolf due lack of sufficient prey density.
- 5 Mexican wolves need to be treated as the Endangered Species that they are. They should not be killed when killing any domestic animal.
- 6 All residents within the wolf recovery area need up-to-date common sense wolf education programs. Fearful adults may be frightening children through their own misinformation.

Nancy L kaminski  
General Delivery  
San Lorenzo, NM 88041  
kaminskinancy@hotmail.com

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Christine Wells  
<cwells@newmex.com>  
09/30/2007 05:39 PM

To R2FWE\_AL@fws.gov  
cc  
bcc  
Subject wolf recovery program in AZ and NM

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OCT 01 2007

FWS-NMFS

Brian Millsap  
State Administrator  
NM Ecological Services Field Office  
2105 Osuna NE  
Albuquerque, NM 87113

Dear Mr Millsap:

I support the Mexican Wolf Recovery Program---even though it has met with dire circumstances and difficulties.

I believe that wolves should be able to roam beyond the artificial boundaries of the recovery area, and that trapping and shooting of wolves must halt until recovery goals are met.

Ranchers should be REQUIRED to to practice responsible husbandry, which includes proper care of ill livestock and of young calves and their mothers. Penned calving areas may be the answer. Herding with dogs may also be an appropriate practice.

The USFWS has a responsibility to protect the biome and to restore that which our predecessors have destroyed. Wolves were here before man or cattle.

I urge you to do whatever you can to ensure Mexican Wolf Recovery.

Sincerely,

Christine L. Wells, Ph.D.  
PO Box 730  
Arroyo Seco, NM 87514  
cwells@newmex.com

19

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

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OCT 10 2007  
WS-NM

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").**

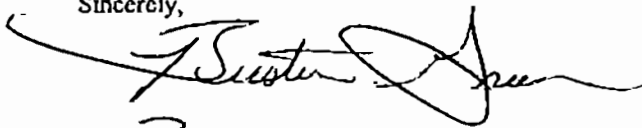
Dear Mr. Millsap:

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

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

Sincerely,



Buster Green

HC 60 Box S

Quemado NM 87829

(505) 788-2258

19

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

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OCT 10 2007

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Sincerely, *Billy G. Green*  
*HE 60 Box 10*  
*Deserado, NM 87829*

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

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Sincerely,

*Jina Clawson*

*Jina Clawson  
Box 236  
Ramah, N. Mex  
87321*

Jina Clawson  
Box 236  
Ramah. N. Mex 87321

Brian M.  
State Ac  
U. S. Fish  
Ecologic  
2105  
Albuquerque

2711331001

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

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Wayne Clawson  
Box 236  
Ramah NM  
87321

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Box 236  
Ramah NM  
87321

Brian Millsap  
State Administrator  
US Fish and Wildlife Service  
2105 Osuna NE  
Alb NM

8711391001 R051

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

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OCT '10 2007  
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Sincerely,

*Karolie Green*

Karolie Green  
El Rancho Verde  
HC 60 Box 10  
Quemado, NM 87870-0601



Brian Millsap  
State Administrator  
U.S. Fish and Wildlife Service  
Ecological Services Field Office  
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Sincerely,

*John K. Robertson Jr.*  
PO Box 395  
Quemado, NM 87829

✓  
10/17/07

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

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OCT 22 2007

FWS-NMFC

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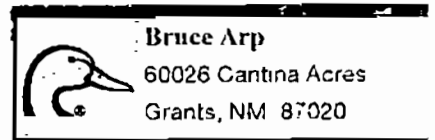
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Sincerely,

*Bruce Arp*



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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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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 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,

John K. Kinkerton Jr.  
PO Box 395  
Quemado, NM 87829

10/18/07

RECEIVED

OCT 22 2007

U.S. NMFS

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").**

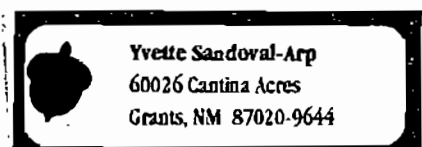
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Sincerely,





Doug Fine <fine@well.com>  
10/30/2007 08:18 AM

To R2FWE\_AL@fws.gov  
cc  
bcc

CEIVE

OCT 30 2007

Subject Mexican Wolf Recovery Comment NMFS

I wish to fully support the Mexican Wolf Recovery Program. Predator/prey balance is good for people as well as forest ecosystems. As a New Mexico resident and neighbor of the Gila National Forest, I, like many of my neighbors, urge the agency to continue and grow this program so that healthy, wild populations of wolves repopulate our area as nature intended and as benefits the ecosystem. Any concerns about livestock predation on private land should be mitigated with timely, market-based financial payments until the program is complete.

Sincerely,

Doug Fine  
New Mexico

--

"Half the Story Has Never Been Told." --Bob Marley

--



PAUL C. BANDY  
R - SAN JUAN COUNTY  
DISTRICT 3

CGF

OCT 30 2007

FWS-NM

HOME PHONE: (505) 344-0865  
E-MAIL: paul@paulbandy.org

MAILING ADDRESS:  
388 CR 2900  
AZTEC, NEW MEXICO 87410

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").**

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Sincerely,

*Paul C. Bandy*  
New Mexico state rep. dist #3

*Farm*



mustenga@cybermesa.com

11/06/2007 06:13 PM

To R2FWE\_AL@fws.gov

cc

bcc

Subject Scoping Comments pursuant to Federal Register Vol. 72,  
No. 151, Pages 44065-44069

RECEIVED

NOV 06 2007

FWS-NMFC

U.S. F&WS State Administrator Brian Millsap  
2105 Osuna NE  
Albuquerque, NM 87113

Dear Dr. Millsap,

Thank you for this the opportunity to submit scoping comments on Scoping Comments pursuant to Federal Register Vol. 72, No. 151, Pages 44065-44069: Endangered and Threatened Wildlife and Plants; Notice of Scoping Meetings and Intent to prepare and 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")--the proposal to revise the Endangered Species Act (ESA) Section 10(j) rule that established and governs the management of the nonessential experimental population of Mexican wolves in the Blue Range Wolf Recovery Area (BRWRA).

Please allow me to express my concern that today, almost a decade after wolves were reintroduced into the BRWRA, fewer than 60 lobos exist in the wild. The Mexican gray wolf is a charismatic and integral part of our ecological heritage, which deserves our protection. Lobos belong in the American Southwest. We hope that the U.S. Fish and Wildlife Service will utilize this rule-making process to implement the conservation mandate of the ESA, and thus facilitate success for our Mexican gray wolf program.

Sweeping changes will be necessary in order to get our wolf program back on track. First and foremost, the Mexican gray wolf (*canis lupus baileyi*) should be listed as endangered in its own right, separate and distinct from the gray wolf (*canis lupus*). At the very least, the population of Mexican wolves in the BRWRA should be designated as "experimental, essential" under ESA Section 10(j).

Beyond this initial "uplisting," the Service can and should make many changes to the ways in which wolves are managed in the Southwest. These include: promulgating formal management procedures or guidelines for improving or maximizing the genetic integrity and viability of the BRWRA population of Mexican wolves; revising the current 10(j) rule to include authority to conduct initial releases of captive wolves anywhere within the BRWRA; eliminating all restrictions to wolf dispersal and movements; requiring livestock operators on public land to remove, bury, or render inedible carcasses of dead livestock to reduce the likelihood that wolves become habituated to feeding on livestock; repeal or at least suspend Standard Operating

Procedure (SOP) 13 until the 100 wolf threshold has been met; and immediately reinitiate recovery planning on behalf of the lobos.

The ESA requires that our lobos be managed in order to "further the conservation of the species." Our obligation to recover Mexican wolves, however, goes beyond a legal mandate. Returning wolves to their rightful place on the landscape is both a moral and ecological imperative. Thank you for this opportunity to be a voice for wolves. I firmly believe that God put diversity on the planet so we can learn compassion. Please take this life-affirming opportunity to show the world you are powerful and compassionate at the same time.

Sincerely, Diane Stayner  
PO Box 791  
Mc Intosh, NM 87032





Eric Dillingham  
<edillingham@fs.fed.us>  
11/07/2007 08:21 AM

To R2FWE\_AL@fws.gov  
cc  
bcc  
Subject Mexican Gray Wolf scoping

RECEIVED  
NOV 07 2007  
INS. AREA C

Hello -

You can see from my title and address that I am professionally affiliated with the Forest Service. Operating in a personal capacity, I would like the condensed version of your documents sent to:

Eric Dillingham  
1307 South Canyon  
Alamogordo, NM 88310  
505.434.3501

I don't have the time or patience to weed through an entire EIS (get enough of that, thanks) but would gladly review anything related to paleontological and prehistoric range of gray wolves as well as the short version of your planned reintroduction and perceived impacts. Also, if you'd post the condensed version on your web site, then maybe we can save some postage and a later trip to the dump.

Thanks,

Eric Dillingham  
Assistant Forest Archaeologist  
Lincoln National Forest  
1101 New York Avenue  
Alamogordo, NM 88310  
505.434.7276 or .7200  
FAX 505.434.7218

Gila Livestock Growers Association  
P.O. Box 111  
Winston NM 87943

RECEIVED

NOV 14 2007

US-NM-EIS-FC

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

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,

The Gila Livestock Growers Association appreciates the opportunity to comment on the Scoping process for the Mexican wolf EIS for the amendment of the final rule.

Many of our members have been grievously affected by the current management of the program and we believe an appropriate 10J rule change is necessary to keep our members economically solvent and productive in their communities.

**Requiring removal of livestock carcasses:** We would hope that scientific publications covering scavenging of livestock carcasses as the behavior relates to depredation of livestock, would be used as best available information rather than the outdated, biased information from the Mexican Wolf three Year review. Such documents are widely available and show the role of carcass disposal as a possible factor predisposing farms to wolf depredations remains unclear despite several studies on the matter. If carcass removal worked to deter livestock depredation its role would certainly be clearer. **Assessing Factors That May Predispose Minnesota Farms to Wolf Depredations on Cattle** L. David Mech, Elizabeth K. Harper, Thomas J. Meier, William J. Paul *Wildlife Society Bulletin*, Vol. 28, No. 3 (Autumn, 2000), pp. 623-629

Use of required carcass disposal will not deter wolf packs from preying on livestock due to the Mexican wolf team's insistence on leaving wolves in proximity to humans and livestock. Requiring ranchers to dispose of carcasses will only serve to further burden them physically and economically. Carcass disposal is not always reasonable or possible. Frozen ground will keep ranchers from burying carcasses possibly for months. Small family ranches with low incomes may not own the equipment necessary to dispose of a carcass. Rugged and remote terrain does not lend to easy location or access to possible carcasses for disposal. There is no science that supports the theory that scavenging leads to depredation. Most studies conclude that proximity leads to depredation and if the agencies do not choose to limit wolves proximity to human habitation and livestock operations, then wolves will prey on livestock. There are many professional wolf managers who do not favor a carcass removal requirement and do not agree that it will do anything positive towards eliminating or minimizing depredation. It will burden livestock producers un-necessarily.

**Eliminate translocations of problem wolves:** - Translocations of problem and depredating wolves should be ceased as a management tool. These animals should be removed with a preference towards permanent captivity. Science shows problem or depredating animals are not cured by translocation and often simply go back to the area they were causing the problems. Translocation does little if anything to mitigate the behavior of problem or depredating wolves. Far preferable is permanent removal by lethal or non lethal

means with no chance for release. Especially for those wolves that have been associated with human habitation and frequent homes.

**Abstract: Evaluating Wolf Translocation as a Nonlethal Method to Reduce Livestock Conflicts in the Northwestern United States** ELIZABETH H. BRADLEY , DANIEL H. PLETSCHER , EDWARD E. BANGS , KYRAN E. KUNKEL , DOUGLAS W. SMITH , CURT M. MACK , THOMAS J. MEIER , JOSEPH A. FONTAINE , CARTER C. NIEMEYER , AND MICHAEL D. JIMENEZ

Successful non-lethal management of livestock predation is important for conserving rare or endangered carnivores. In the northwestern United States, wolves (*Canis lupus*) have been translocated away from livestock to mitigate conflicts while promoting wolf restoration. We assessed predation on livestock, pack establishment, survival, and homing behavior of 88 translocated wolves with radiotelemetry to determine the effectiveness of translocation in our region and consider how it may be improved. More than one-quarter of translocated wolves preyed on livestock after release. Most translocated wolves (67%) never established or joined a pack, although eight new packs resulted from translocations. Translocated wolves had lower annual survival (0.60) than other radio-collared wolves (0.73), with government removal the primary source of mortality. In northwestern Montana, where most wolves have settled in human-populated areas with livestock, survival of translocated wolves was lowest (0.41) and more wolves proportionally failed to establish packs (83%) after release. Annual survival of translocated wolves was highest in central Idaho (0.71) and more wolves proportionally established packs (44%) there than in the other two recovery areas. Translocated wolves showed a strong homing tendency; most of those that failed to home still showed directional movement toward capture sites.

**The agency must continue reasonable management practices including lethal control of problem wolves.** Wolf Removal by lethal means, although controversial, may enhance long term recovery goals and there is no evidence lethal control contradicts recovery or jeopardizes the species. At worst, lethal management may possibly lead to a slower but perhaps more sustainable recovery taking place. Lethal removal as a wolf management tool should be kept regardless of politics for the well being of small family livestock operators who cannot be forced to suffer unmitigated wolf depredations due to proximity of wolves to their herds.

In the prior FWS consultation conducted in 1995, as well as the NEPA documentation associated with the current Final Rule, the agency reasoned that if the reintroduction program were to succeed and result in a sustainable population of Mexican gray wolves inhabiting the recovery area, then this development would be of great benefit to the conservation of the species, in accordance with the statutory objectives of the ESA. If, on the other hand, the reintroduction program did not succeed and all of the reintroduced wolves had to be killed or otherwise removed from the recovery area due to hybridization or other negative consequences, then the agency concluded that the species would not be jeopardized because of the ongoing existence of the captive-breeding program from which the population of reintroduced wolves was derived. Sources, [Environmental Impact Statement AR 25, 993.] and AZ NM Coalition of Counties V. USFWS Final Ruling

Wolf supporters once agreed with the above statements. See AR Doc. 25 at A-6; 50 C.F.R. § 17.84 (k)(3)(x). The section 7 consultation recognized that a variety of factors, i.e., natural death, accidents, and lethal take of wolves pursuant to Service's Final Rule, would likely contribute to a number of short-term mortalities but, in the end, the reintroduction program would "ultimately result in the reestablishment of wild populations of Mexican wolves (where none currently exist) and, thus, beneficially contribute to the long-term recovery and conservation of [the] endangered species." Source: DEFENDERS OF WILDLIFE et al interveners in Arizona New Mexico Coalition of Counties et al v USFWS

All scoping and rule planning should comply with that specific and emphatic statement in the *ESA* that it will “not be used to engineer social change”. Comments that seem to demand that this program is necessary in order to foster changes in the economic and social structure of the region or that fail to acknowledge the need to mitigate social and economic pressure on individuals and communities should not be used in the scoping process. Protocol should be developed to enhance participation of affected individuals and local governments in decision-making and management of Mexican wolves in order to mitigate their impact on communities and individuals and limit those changes contrary to the *ESA*'s requirements that it not be used to engineer social change.

**The take of Mexican wolves by livestock guarding dogs and hunting dogs, when used in the historic and traditional manner must be permitted (Section 17.84 Special Rules Vertebrates vii).** The current rule has running through it an undercurrent of discrimination against traditional users of the land — hunters and trappers as well as livestock operators. Continuing to discriminate against traditional uses of the land violates the multiple use doctrine and creates an unwelcoming atmosphere for wolf recovery among traditional land users.

The current rule states, “Private citizens also are given broad authority to harass Mexican wolves for purposes of scaring them away from people, buildings, facilities, pets and livestock. They may kill or injure them in defense of human life or when wolves are in the act of attacking their livestock (if certain conditions are met)”

**For the sake of human health and safety, new rulemaking must contain these specific changes.** “Private citizens also have broad authority to harass Mexican wolves for purposes of scaring them away from people, buildings, facilities, pets and livestock Specific language is needed to state [they may kill or injure them if threatened by them 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.] It has become apparent that these are necessary changes as shown by the increase of human encounters listed in the 5-Year Review and those that have been documented beyond that review. It is also necessary to recognize that the FWS and its cooperators have not been and can not be everywhere at once. Mitigating human encounter problems will require this kind of flexibility if human life and safety are to be protected as a basic civil right. It must also be recognized that human mortality is a very real risk. A mortality incident occurred Nov 8 2005 in Canada and has now been confirmed as wolves displaying predatory behavior on a human victim. The victim, a young man in the prime of life, was not a person likely to become a victim of a predatory attack. According to all data available from the FWS used in the construction of the current rule, this type of attack is not possible and will not occur. However, behavior of the wolves involved in the Canada incident prior to the attack is very similar to behavior displayed by Mexican wolves in the Gila and Apache forests. To continue to attempt to portray Mexican wolves as unable or unwilling to be a danger to humans is irresponsible and historically untrue.

see) **IS THE FEAR OF WOLVES JUSTIFIED? A FENNO-SCANDIAN PERSPECTIVE** John D.C. LINNELL<sup>1</sup>, Erling J. SOLBERG<sup>1</sup>, Scott BRAINERD<sup>1</sup>, Olof LIBERG<sup>2</sup>, Håkan SAND<sup>2</sup>, Petter WABAKKEN<sup>3</sup>, Ppo KOJOLA<sup>4</sup>

See) A Review Of Evidence And Findings Related To The Death Of Kenton Carnegie On November 8, 2005 Near Points North Saskatchewan by Mark E. McNay Alaska Department of Fish and Game.

Language in rulemaking should include: **Wolves exhibiting fearless behavior or those becoming habituated to humans and posing a non-immediate but demonstrable threat to human safety should be harassed or humanely dispatched by the USFWS, other federal land management agencies, state or tribal conservation agencies, or designated agents of those agencies. 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. A similar provision can be found in the Minnesota wolf plan but not in the current Mexican wolf documentation this lack of adequate management of problem and dangerous wolves discriminates against poor rural New Mexicans and Arizonans.**

**Future rulemaking should implement 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 permits to those who are suffering these types of territorial challenges by Mexican wolves at their homes. To ignore this serious problem has and will continue to lead to more wild born wolves becoming habituated to people and will cause more need for wolf removal and control. Currently not enough is being done to develop wild wolves that do not come into homes and private lands. Rural residents are suffering increasingly from wolf attacks on their domestic animals and pets and current methods have done little to stop these behaviors. Rubber bullets paint balls are of no use if the wolf or wolves are not conditioned to avoid human habitation. Appropriate conditioning may require more severe pressure on wolves. In one case, two wolves were hit with rubber bullets multiple times and still came into a camp to kill calves even after being struck by the bullets. More affective methods are needed to stop problem behaviors.**

**Agencies must use appropriate mapping to display current and potential wolf habitat that also recognizes and displays the human element, income levels, low income, minority impact and business impacts in low income or minority communities. Such documentation should demonstrate that people already reside in current or potential recovery and reintroduction areas. This is one of the mistakes of the prior rule and EIS, the public was left with the mistaken impression that there would be no impact on human element as it related to the maps used in that plan. Currently, the public appears to believe Mexican wolves are only on landscape that is not occupied by humans or only in wilderness areas. This is not a factual rendering of the area wolves are occupying.**

**Scoping planning should recognize the need to maintain livestock production and historic pastoral communities as economic and cultural necessities on the landscape. Many people believe that cattle, horses, hunting and other traditional uses are just as integral and valuable to the landscape as wolves. There is a cultural need to keep livestock operations in business for aesthetic, historic and religious purposes. Iconic depictions of livestock and ranching by artist and writers such as Remington, Charles Russell and Will James show that cattle are historically significant to the west and that ranching should not be replaced with other, historically or culturally indistinct jobs and societies that do not encourage maintaining the regions historic pastoral agrarian community. It must be recognized that livestock are as integral to these regions as most wild animals. Apache Indians ran cattle in the area, possibly for centuries followed by Spanish settlers, descendants of whom still have ranches in the area.**

**Agency personnel must recognize the need to require inventories of all wolves currently on the ground whether they be released captives or wild born animals, and investigate all reported wolves and wolf sign. Currently most wolves are undocumented un-vaccinated and un-counted by agency personnel. New Methods need to be employed to understand the impacts wolves will have on ungulate species both wild and domestic as well as their affect on watersheds, spread of disease and other wildlife populations. Currently people are being impacted by un-collared un-counted animals with no mitigation to these impacts due to lack of documentation. Methods to try could include, scat collection for individual DNA analysis, trail cameras, trapping and current count methodology. Improvement on current limitations should be investigated at length.**

**Scoping and rulemaking must provide for the protection of private property regardless of its location. The following change to Section 17.84 Special Rules Vertebrates (vii) is necessary. *Removal of Permit requirement for take of depredating wolves. This wording should be added: "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' livestock owners or their agents may take (including kill or injure) any wolf engaged in the act of killing wounding or biting livestock (see definition change).***

**Federally administered grazing allotments hold private rights in the form of water rights, rights of way to access that water and privately owned improvements known as fee interest. Allowing ranchers to protect private property (livestock) on land where they own a fee interest is just as appropriate as allowing them to protect their private property (livestock) on fee simple land. In any future rulemaking and management**

planning a provision to recognize the private water rights and rights of ways on federally administered grazing allotments should be integrated with wolf management just as private lands provisions are recognized. (Curtin v. Benson; Hage v. United States; US v. New Mexico, Walker v. United States)

Review literature to validate assumptions contained in current rule. The current rule's biological summary contains several inconsistencies and poor information that should not be perpetuated in any future rulemaking. Most notably, the fact that there has never been a scientific study or lacking data availability, a literary study showing evidence that "*Mexican wolves numbered in the thousands prior to European settlement*", as stated in the final rule. Perpetuating this faulty information may well have a detrimental impact on recovery of this species as it is not known how many wolves can biologically occupy arid desert landscapes.

It is necessary that a peer reviewed literary study of the earliest pre European explorations logs, naturalist documents and personal journals written about the Southwest and Mexico, be researched to better determine the logical extent of the range and number of Mexican wolves that historically occupied the region prior to European settlement. This should be done prior to any further rulemaking or the development of a management planning. This should rely on references to wolves and prey species that are thought to be the historic prey biomass of the Mexican gray wolf, [C. L. Baileyi] that inhabited the region before European (including Spanish) settlement.

*For example in Notes of a Military Reconnaissance by Lt. Col. W.H. Emory, October 1846, "Game in New Mexico is almost extinct, if it ever existed. Today we saw a few black tailed rabbits and last night Stanley killed a common Virginia deer."* The party was located at Emory Pass near modern day Kingston, New Mexico, facing near starvation due to the lack of game.

Any information otherwise obtained and subsequent decisions are based on subjective information and the narrow view of earlier Mexican wolf recovery teams. In fact, the entire supposedly historic range of C. L. Baileyi was reinterpreted by the team to consist of the possible historic range of C.L. Mogollonensis as well as the possible range of C.L. Monstrabilis. The team then determined that all three separate species were really C.L. Baileyi. This subjective decision was made despite conflicting scientific viewpoints.

These arbitrary decisions led to arbitrary boundaries drawn on a map to justify a larger and different than historic recovery area, for what is now deemed the Mexican gray wolf. This arbitrary mapping has now resulted in a lawsuit over the distinct population segment and historic habitat recovery planning based on that habitat and has halted any further recovery planning for the Mexican gray wolf otherwise known as C.L. Baileyi.

The data most used in determining carrying capacity and probable historic range of the Mexican wolf was taken after European settlement it does not accurately reflect true historic range. It is well known that although Apache Indians did run and hunt feral cattle in the region historically, (see *Notes of a Military Reconnaissance by Lt. Col. W.H. Emory, October 1846,*) the increase of domestic livestock after European and Spanish settlement to the west did result in an alternative prey biomass source that contributed to a better more reliable diet for most native predator species. This artificially increased the breeding ability and populations of those predators. For this purpose, it must be considered that after European settlement, Mexican wolf numbers rose sharply due to the entrance of the pastoral cultures and livestock production that still exists in the southwest.

#### **Scoping documents must consider current rule inaccuracies and inconsistencies**

**In any future rulemaking and management planning, care should be taken to coordinate and create consistency within the entire rule and/or plan and SOP's necessary. This includes checking for consistency in special rule sections, definitions sections, and biological sections. Definitions changes are needed in new rule and management plans as well as any SOPs should include:**

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

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

**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.

**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.**

**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. This should come in the form 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.**

During the past eight (8) years, the U.S. Fish & Wildlife Service (FWS), the Arizona Game & Fish Department (AGFD) and/or the New Mexico Department of Game & Fish (NMDGF) have relied upon a non-governmental organization (NGO) to provide compensation for the Mexican Wolf Program. Not only has this program not provided for full compensation for financially impacted entities, but it ignores the responsibility of the federal and state government to compensate their citizens for actions that result in take of private property.

Nor do the payments made by the NGO's take into consideration the value of lost genetics or lost production of livestock. Nor do they take into account the loss of weight gain of livestock that are being harassed by wolves.

Payments by NGOs do not take into consideration the additional management costs associated with the wolf program, such as the extra labor necessary in attempting to limit the number of direct losses to wolves. Finally, there is no guarantee into the future that this NGO, or any others, will be able to continue payments.

**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. Currently New Mexico and Arizona livestock producers have been left without a reasonable definition of depredation associated with missing animals that are obvious wolf depredations. This is nothing short of discrimination against southwest ranchers who run cattle in large landscapes and rely on calf crops for an annual paycheck. It has proven impossible to confirm all losses associated with the program to the satisfaction of NGO's responsible for compensation and to private property owners largely because of the size of the country the program is taking place in. Ranchers are unable to see their**

livestock for days or weeks at a time. A pack of wolves can completely consume a newborn calf so that there is no carcass left for confirmation. To ignore this issue is to allow this program a prey biomass of baby calves at the unmitigated expense of rural land users and family's causing them to continually bear a tremendous disproportionate burden for the Mexican wolf program.

Scoping and rulemaking documents should recognize that ranchers have gone out of business due to the impacts of the Mexican wolf program and recognize that as small businessmen, ranchers are well aware of the losses that are part of doing business in rough country, including predator losses. And recognize that ranchers have always been willing to share their environment, an environment they enhance with stewardship practices as well as direct benefits like water and supplemental feed during weather-related disasters. But there is a level of what they can continue to share and remain viable. Any rulemaking should appropriately recognize and mitigate impacts to pastoral communities and individuals affected by this program.

Sincerely  
Laura Schneberger  
President Gila Livestock Growers Association.



CC: Director, Quemado: Miguel Aragon

Director, Black Range: Jack Diamond

Director, Reserve: Charlie McCarty

Director, Glenwood: Joe Nelson

Director, Silver City: Alex Thal

Director, Wilderness: John Richardson

Director, Luna: Alvin Laney

Director at Large: Kit Laney

Director at Large: Tom Klunker



Faxed: Brian Millsap  
US Fish and Wildlife Service  
NM Ecological Services Field Office

Evalyn Bemis 2105 Osuna NE, Albuquerque NM 87113 346-2542

From: Evalyn Bemis [evalyn@newmexico.com]

Sent: Monday, November 19, 2007 2:46 PM

To: 'r2fwe\_al@fws.gov'

Subject: wolves

I value healthy, whole ecosystems above all else, as designed by God and nature, not controlled by man. Wolves are one facet of a balanced ecosystem in the Southwest and if we mean for them to survive as a species we must STOP killing them.

The Mexican Gray Wolf must be reclassified to "experimental, essential" or "endangered". They must be allowed to disperse beyond the Blue Water Wolf Recovery area, a man-made zone that cannot ever work if true recovery is intended. There should be no cap on the numbers of wolves – what does wild really mean if you restrict the numbers to some artificial limit?

Buy out grazing leases in the Gila Wilderness and Apache-Sitgreave National Forest. Require livestock operators to attend their animals and to remove or destroy carcasses. Revise the recovery plan – it is completely out-of-date and unworkable.

This is do-able. We can live with wolves but we must not live without them.

Evalyn Bemis  
City Different Realty  
direct 505-982-4141  
office 505-983-1557  
[www.CityDifferentRealty.com](http://www.CityDifferentRealty.com)  
[www.evalynbemis.com](http://www.evalynbemis.com)

Evalyn Bemis

1208 Vista Verde Ct.  
Santa Fe, NM 87501

November 18, 2007

RECEIVED  
NOV 26 2007  
U.S. FISH & WILDLIFE SERVICE

ATTN: MEXICAN GRAY WOLF NEPA SCOPING

Brian Millsap, State Administrator  
U.S. Fish and Wildlife Service  
New Mexico Ecological Services Field Office  
2105 Osuna NE  
Albuquerque, NM 87112

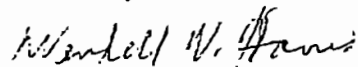
Dear Sir,

It is well known that there are sound ecological reasons for the introduction and maintenance of wolves in New Mexico. It is also well known that ranchers have always expected the government to exterminate any animal that might pose the slightest problem for them.

The U.S. Wildlife Service is supposed to act on behalf of the American people and the ecological health of the environment of this country, not a special interest group like the ranch owners, however wealthy and vociferous such a group may be.

**SUPPORT THE RECOVERY OF WOLVES IN NEW MEXICO. NOT SPECIAL INTERESTS.**

Sincerely,



Wendell V. Harris

✓  
Brian Millsap, State Administrator  
USFWS  
2105 Osuna NE  
Albuquerque, NM 87113

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NOV 28 2007

MAIL

November 27, 2007

Mr. Millsap,

We would like you to know that our family firmly supports the USFWS efforts to reintroduce the Mexican Gray Wolf to its former range in New Mexico and Arizona. We support the strongest protections possible for this great animal and urge you to make any changes necessary to ensure its viability and its ability to thrive.

Thus far, the Wolf Recovery Mgmt Plan has been only half-heartedly implemented and many wolves have been killed by NM and AZ ranchers. This is unacceptable. By now there should be well over 100 individuals roaming our great state, there are barely half that many. We urge you to do whatever it takes to make this species viable in the wild. We'd love to see them in our part of the state.

Don't stop until this animal roams its entire historic range.

Sincerely,



Jim O'Donnell

Nina Silverberg

Isabella O'Donnell

PO BOX 660

Arroyo Hondo, NM 87513

PRINTED ON A BLEND OF TREE FREE KANAF AND RECYCLED PAPER

**Jess Alford Photography**  
easyjess@nmia.com



Thirty Four Easy Street  
Tijeras, NM 87059 8002  
Ph 505 286 0802  
Fx 505 286 0803

November 30 2007

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

Attn: Mexican Gray Wolf NEPA Scoping

I t's a great puzzlement to me as to why I should need to write U.S.F.W to justify prioritizing wolf recovery over livestock grazing.

After all isn't the Mexican Wolf a native species to the Western United States and isn't the stated mission of U.S.F.W. "Conserving the Nature of America?" And isn't the introduction of domestic animals into western ecosystems in direct opposition to "Conserving the Nature of America?"

Wolves are a distinct part of our western ecosystem and fit into the overall plan of preserving this ecosystem. Domestic livestock destroy riparian areas, which is the habitat of eighty five percent of our wildlife, by totally consuming cottonwood, willow and aspen along stream beds leaving wide , shallow streams void of vegetation unsuitable for either native fish or wildlife. Added to this destruction is the pollution in the form of livestock feces in the streams and methane to add to overall global warming.

Should livestock be allowed to stay, which would still be a detriment in itself, then the addition of wolves would keep these domestic creatures moving giving the riparian vegetation a chance to flourish as has been exemplified by the successful reintroduction of wolves into the Yellowstone area of Wyoming.

Ranching on public lands is not a sustainable venture and would likely soon vanish were it not for a plethora of government subsidies among which is the mass killing of wildlife by Wild Life Services under the guise of protecting livestock. Wildlife Services slaughters not just wolves but mountain lions, coyotes, bears, prairie dogs and other wildlife while trying it best to stay out of the public eye so that we don't

know of the havoc they spread.

In addition, the largest nutrition study ever done spelled out in a book titled "The China Study" by Dr. T. Collin Campbell, a team project of Cornell University, Oxford University and the Chinese Sciences Academy, showed the number one cause of cancer to be animal protein.

The worry of diseases among livestock would be calmed with wolf introduction. Deer carrying whirling disease, rabbits carrying tularemia, and other species carrying diseases would be the easiest prey for wolves.

Prioritizing wolf recovery over livestock would not only be a great step toward a healthy western ecosystem but would amount to our coming to terms with our own western land, to bring it toward the beauty it once held, to **Conserving the Nature of America** and to bring ourselves a step closer to who we really are.

Thank you for lending an ear to all our comments,

A handwritten signature in cursive script, appearing to read "Jess Alford". The signature is fluid and extends across the width of the text area.

Jess Alford

**Rob Raucci**  
**333 Hillandale Ave.**  
**Belen, NM 87002**  
**505/507-8447, robbyredux@msn.com**

December 1, 2007

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

Dear Brian:

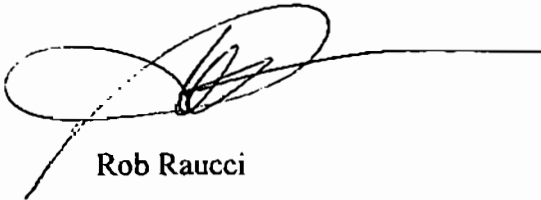
I'm writing to voice my concern and dissatisfaction over the systematic killings of the Mexican Gray wolf.

The mandate has been to recover this animal not eradicate it. The Mexican Gray Wolf maintains close-knit families; they mate for life. It's my perception that wolves know more about "family values" than do most Americans. We can learn from this animal.

These animals are a valuable part of this state's eco-system and they are protected as an Endangered Species under New Mexico law.

I urge you to find a solution to prevent these animals from becoming extinct again. You can make a difference. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to be 'Rob Raucci', with a long horizontal line extending to the right.

Rob Raucci

**Attn: Mexican Gray Wolf NEPA Scoping**

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

December 4, 2007

Dear Mr. Slown,

Thank you for holding the open house style meetings about the Mexican Wolf program. I liked that it was not so confrontational and contentious and that back and forth conversation could actually take place.

Our family lives very rurally, just outside of the BRWRA and we would like to see Mexican wolves be successful and are very disheartened that under current management, success is not allowed. The program needs to change in several ways. I think wolves need more protection because too many are being killed and "permanently removed". They aren't being allowed to recover. I think that instead of designating them as experimental, non-essential, there should be a conservation alternative changing that to experimental, essential. Even the language of the first designation makes one think that wolves are not important or that they are not so critically rare and endangered. Plus the second would allow for more protection which Mexican wolves direly need.

For instance, below is a photograph taken from our house in the foothills on the west side of the San Mateo mountains. It is looking southwest at the Wahoo mountains which are inside the boundaries of the Blue Range Wolf Recovery Area:



Next is a view in 180 degrees from the last one to the northeast. It is of the San Mateo Mountains which are NOT in the recovery area:



How is a wolf supposed to know he can be in the former but not the mere half day's journey to the latter? They both appear and indeed are the same kind of habitat. There is plenty of prey and very few people. In fact, wolves have wandered here and I once saw the pair that were given the San Mateo name. My dogs ran out barking and I followed them in time to see the wolves running away. Of course they weren't allowed to stay here. It saddened me very much to learn that the male of that pair was shot by your agency on the Arizona border. You may not want to release wolves here, but if they wander over and stay, it is because it is suitable habitat for them. Let them be. You should also allow release directly into the New Mexico part of the BRWRA. There is no scientific reason to not do that and it would offer more flexibility to the program.

I am concerned about wolves coexisting with livestock. Can more be done to help permittees mitigate wolf predation? Supply them with herders, guard animals, fencing, pepper spray and/or help them time calving so it happens all at once in a protected place. I know Defenders of Wildlife does much of this now and I think mitigations should be required before there is a go-ahead to kill a wolf. I would not be opposed to FWS paying some of the costs of these mitigations- surely it would be cheaper than mounting kill operations with the host of aircraft and machinery that are required to do that. Are there not elements that attract wolves- dead animal carcasses, dogs, garbage pits around homes, etc- and is it not possible to be aware of and to take steps so these attractants are not accessible to wolves? I just think there is more that can be done by both your agency and public land permittees.

The science is pretty clear. The genetic diversity of wolves is precious and is in danger of being lost forever. You are killing more wolves than can be replaced naturally. I am convinced that wolves help to balance everything in the food chain in positive and



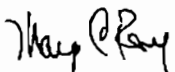
surprising ways. Outfitters say that wolves are killing all the elk. But when NM Game and Fish surveys for elk, they find more than ever. I know elk were introduced to the San Mateos in 1962. Hunting didn't begin until the 80's and the outfitting and guiding phenomenon did not seem to get going until the 90's. I've seen elk behavior change in that time as a result of human hunting. They don't stand around when a car goes by anymore and they now head out of the meadow bottomlands at the first break of day which might make a person think there weren't very many elk because they make themselves harder to see. But this is as a result of human hunting, not wolves. While anecdotal, I haven't seen elk numbers decline except perhaps fewer calves in years of harsh drought. There does appear to have been a sharp decline in Mule Deer numbers in the time we've lived here though and I often wonder if the rise of elk is to blame. This makes me think that if wolves could bring down the number of elk, then maybe mule deer could come back a bit. I also see that in the Northern Rockies, wolves have greatly reduced the number of coyotes and that this has benefited ground nesting birds and might help Mule Deer as well.

I heard one of the San Mateo wolves howl when they were here and I can't really articulate why and how that sound moved me to my core. It is a sound of pure wildness like an elk bugle or a hawk scream. It also made me think that restoring that sound which has been so long absent because of human eradication is so proper. I just don't think humans have the moral right to completely exterminate an entire species. I often hike in places where no one else appears to go. I've run into bears and lions not to mention coyotes and I just don't see wolves posing any more risk to people especially given their history of not harming humans.

Sometime after the San Mateo pair were relocated, a lone male wolf whose number I have forgotten wandered this way but he was sentenced to die. We knew why the plane kept circling and circling that entire morning. I felt so powerless and besieged and could not help but think of the terror that wolf knew in his last moments when, because of his radio collar, he had no chance against the aerial gunner. We didn't hear the shot that killed him, but as the motors faded away, we knew another wolf had died. That this event was sanctioned by the very agency charged with protecting and recovering wolves is beyond senseless.

Please change the program so that wolves can actually recover, so that the canyons get their echoes back and so that the land can have a richer contingency of diversity. Thank you for considering my comments.

Sincerely,



Mary C. Ray  
HC 30  
Dusty Route  
Winston, NM

V  
P.O. Box 272  
Glenwood, NM 88039  
Dec 6, 2007

John Slown  
U.S. Fish and Wildlife Service  
New Mexico Ecological Services Field Office  
2015 Osuna NE  
Albuquerque, NM 87113

Dear Mr. Slown:

In the wolf restoration program, I would like to see the following changes:

Reimburse for damage to humans due to wolf attacks, including loss of income, full liability equivalent to that paid for premeditated damage to humans in other situations. Be responsible for loss of life when people are killed by wolves. Process judicial cases outside of federal court.

Enact procedures that eliminate the problem of habituated wolves. Eliminate the kids gloves procedures currently enforced when there is a human-wolf interaction.

Prompt permanent removal of habituated wolves on the first occurrence.

Take responsibility for keeping wolves off private property.  
Allow people to drive off or shoot wolves on their private property.

Enact child protective measures.

Keep wolves away from the school. Pay for fences around schools and shelters for kids waiting for the bus.

Allow people to defend their pets, especially on their own property.

Reimburse for replacement costs of pets killed.

Reimburse for emotional costs, including therapy if necessary due to the threat of wolves and loss of pets.

Reimburse ranchers and businesses for their full losses. If you can spend millions on wolves, you can afford to pay their true costs. Pay ranchers to allow wolves on their property enough to eliminate the conflict over financial losses due to wolves.

Sincerely,

*Karen Donn*

Karen Donn

December 4, 2007

RECEIVED  
DEC 26 2007  
USFWS-NMESFO

Ricardo Lara  
P.O. Box 261  
San Miguel, NM 88058

Brian Milsap, State Administrator  
U.S. Fish & Wildlife Service  
N.M. Ecological Services Field Office  
2105 Osuna NE  
Albuquerque, NM 87113

Dear Mr. Milsap:

This letter is directed towards the decision you will be making about the endangered Mexican Wolves that are in New Mexico. I am a sophomore at Gadsden High School, where we had a short study about these endangered wolves.

In my own opinion, I think that the wolves should be kept in their natural habitat. It would be better for them to stay where they are familiar to, and not to a facility where they would feel trapped. I would strongly agree that a law forbidding the killing of the wolves would be better.

This is what I think would be best. Thank you for your time.



Ricardo Lara

Brian Milsar- State Administrator  
U.S. Fish and Wildlife service  
New Mexico Ecological services  
P.O.Box 2105 OSUNA-N.E.  
Albuquerque N.M. 87113

RECEIVED  
DEC 2 8 2007  
USFWS-NMESFO

Darling Garcia  
P.O.Box 3449  
Anthony N.M. 88021

December 5, 2007

To whom this may be concern;

I had the opportunity to get informed about the dangers that the wolves are facing. When I learned about their close extinction my heart broke. I couldn't believe that only 231 Mexican gray wolves remain!! I honestly don't understand why we let their population decreased so badly!! Where in the world where we when they were being killed?! I guess that we were to busy killing them that we didn't even realized that we were getting rid of a beautiful specie!! The sad part is that the majority of the wolves were killed by humans!!! There is no record of any wolf killing a human being, but jet, here we are killing innocent creatures!!

The world is a beautiful place to live in and a lot of incredible species form part of it. The wolves are part of the Earth's beauty so we need to fight for their safety! Just yesterday I didn't know that they were in such danger! I defiantly agree with the help that is being offered to the creatures. I agree with those great, amazing and wonderful people that want to give their hundred and ten percent to safe and protect them!!

I beg the committee that is in charge of deciding the future of the wolves to please analyze their decision. I would appreciate it if they would bring the wolves to New Mexico. It would be an honor to safe and have them in the Land of Enchantment!! I want to fix the mistakes that were made to their population. I want to try to save their specie, so please bring them to New Mexico!!

I know that the wild is their home, but if us humans can't respect their lives in the wild then who will? At least if they are brought to New Mexico their population would increase because their offspring and safety would be monitor. I know that it is natural for a mountain lion to kill a wolf, but in the mountains of New Mexico the mountain lions would be prevent

from attacking a wolf. If we keep them loose in the wild and not do anything about it their specie will become extinct sooner than we think! I don't want them to get extinct like the mammals were!! The mammals didn't die from natural cause but from human cause! Please save the wolves, help save this world that is being killed as every minute passes! Bring them to New Mexico a safe place for them and their future offspring to live in! Please come up with a reasonable conclusion that will benefit both nature and the wolves!!! I appreciate your help and dedication you're wonderful people! I don't know you guys but I'm pretty sure that you're worth gold!!!! **THANK YOU VERY MUCH!!!!**

Sincerely,  
Darling Garcia



## San Francisco River Outfitters

Tom Klumker ~ Brian Klumker

HC 61, Box 179-C • Glenwood, NM 88039 • 505-539-2517 • Fax 505-539-2517

[www.huntinginnewmexico.com](http://www.huntinginnewmexico.com)

[sfroudfitters@gilnet.com](mailto:sfroudfitters@gilnet.com)

U.S. Fish and Wildlife Service  
Attn: Wolf Program  
New Mexico Ecological Service Field Office  
2105 Osuna NE,  
Albuquerque, NM 87113

Dec. 6, 2007

Greetings,

Following are my comments on the scope of Non-essential Experimental Population of the Mexican gray wolf program:

**1. Under the environmental impacts on human health and safety issues** we are learning that many of the wolves in the on going release program and many of their offspring are and have become habituated to human presence and more and more close encounters with these wolves is causing more and more alarm among the people who live in the recovery area and even in several instances outside of the recovery area. Wolf presence in the United States is relatively new since they were basically exterminated 70 years ago. Scientists have little knowledge on the behavior of wolves in today's society, and more especially the pen-raised Mexican Gray Wolf recovery efforts. As the population of these human habituated wolves increases so do the encounters and resulting fear and apprehension of the people living here with these wolves.

One only has to read Dr. Valerius Geist's paper entitled "When do Wolves Become Dangerous to Humans?" to get an eye opening picture of the very real and probable danger that many of these Blue Range Wolf Recovery Area (BRWRA) wolves pose to the citizens in the recovery area and any visitors who might come. This treatise accurately describes and documents not only from Valerius' own personal experiences but his exhaustive and well researched theories and realities of the danger these habituated wolves present.

My recent (Nov.5, 2007) encounter with the Luna Pack of wolves in my hunting camp in the Gila Wilderness thoroughly convinced me that these wolves have no fear of humans or human scent and acted very aggressively towards us. The same pack also acted very aggressively to a group of hikers in the same general area.

Many parents have very real and cause for concern for the safety of their children and we continually hear that the citizens are over-reacting. It behooves the U.S. Fish and Wildlife Service (FWS) and their partners the AZ and NM Game and Fish Departments to take the

whole program back a step and reassess what they are doing and the very real and present danger to our children, adults and unsuspecting visitors. Now is not the time to be complacent, and rely on what Valerius describes as **“The politically correct view about wolves, currently vehemently and dogmatically defended, is that wolves are harmless and of no danger to humans.”** Also according to Valerius, “...one can pin point with great precision the conditions under which wolves will avoid humans as well as the obverse, the conditions under which wolves will attack humans. **Moreover, such conditions are within our power to manage.** It is inconceivable that wolf conservation can be advanced if we do not prevent wolves from attacking people. While attacks have been extremely rare historically in North America, the increase and spread of wolves may change that. Of special concern are wolves that do not see humans as foes and adversaries and habituate to human presence. That, emphatically, does not bode well for the future!”

This pretty much sums up that you the FWS need to do an immediate and comprehensive review of the program to admit that there is a big problem with human safety and is probably only a matter of time before someone is injured or killed by these habituated wolves you continue to dump on the people here. As my bumper sticker reads: “Wolves-Government Sponsored Terrorists!!” The wolves are definitely terrorizing the people here!

**#2. Under the environmental impacts to other species of wildlife** we have only to look at the wolf program in the states of Idaho, Montana and Wyoming to see what is almost certainly going to happen to our elk herds here in the near future. As the number of born in the wild pups continue to increase and the amount of un-collared, un-documented wolves have increased dramatically, we are starting to see a big predation on our calf elk population, which brings an inherent decline in the total elk population. Supposedly a healthy wildlife population will support predation along with hunting. This is based mostly on lion, coyote and bear predation studies but no significant studies to my knowledge, on the affects of wolves on our wildlife and continued healthy, huntable herds of elk and deer. We have only written accounts of the early day settlement of the southwest to guide us, and predation on livestock as well as wildlife was the motivating factors to eliminate wolf presence here. It took several years but they were finally eliminated and the deer herds rebounded to record levels, and the few remaining Merriams Elk were no longer seen and very possibly the wolves had a hand in their extinction.

The re-introduction of elk into the Gila exploded and soon Arizona and New Mexico had world class elk hunting with huge trophy elk taken on a regular basis and has become one of the most popular elk hunting destinations world wide. With this popularity our area has seen a tremendous growth in hunting opportunity and the resulting huge growth of the area's gross revenues which have become a big portion of the area's total economic viability.

Many of my friends, neighbors and associates see what is happening up north and what is starting to take place here and are very worried about what our future will be in the next

few years. Elk hunting is very big business in the BRWRA and has the potential to devastate our economy and the families who depend so heavily on these revenues. Many in the conservation movement believe that wolves will bring about a healthier community of all wildlife, plant life, etc, etc. This "pipe dream" might be more plausible if you eliminate the human factor (primarily hunting) from the equation. Our wildlife agencies and primarily the hunting community have done a great job managing our hunt able wildlife herds over the years bringing elk, antelope and whitetail deer back from near extinction, into huge numbers. Wolves may serve the conservation movements wishes and desires to eliminate hunters from the equation, so that their utopian dream of free ranging, healthy herds of wildlife will once again roam freely through out the west. The only way to do this is to virtually eliminate the human factor, by stopping hunting and severely limit human presence in these wildlands.

The FWS has many people who would like to see exactly what I have described above and it is very apparent that the Agency is either in bed with or forced to, by a constant barrage of lawsuits by these extremists, to do so. It would be so refreshing to see the Agency make a bigger effort to take care of humans first and foremost in their given mission: "Working with others to conserve, protect, and enhance fish, wildlife and plants and their habitat for the continuing benefit of the American people."

Our custom, culture and economy depend on healthy herds of wildlife and depend on the FWS to control the numbers of predators (wolves) before they pose a threat to our huntable herds of wildlife.

**#3. Disproportionately high and adverse impacts on minority and low-income populations** is exactly what is happening to our poor rural economies in the BRWRA. What is described in number two above is not only potentially going to happen, but as is the case with a great many of my friends and acquaintances in Idaho, Montana and Wyoming, has already happened. The elk herds are virtually wiped out by huge wolf populations and their elk hunting businesses are either suffering tremendously or they are totally out of business. Why should the citizens here in the target zone be asked to bear the brunt of this onerous program? We are already in the highest un-employment area in New Mexico as well as one of the lowest household income areas in the entire United States. Economic opportunity or being able to make a living in this area is very, very hard. There is virtually no industry except a small service industry and the Endangered Species Mexican Spotted Owl has almost totally ruined our logging industry. Wolves are greatly impacting many of our ranchers which is still the largest portion of the areas gross revenues. Many of these ranchers are either out of business or going out due to heavy wolf predation.

We are constantly told by the pro-wolf community that the wolves will bring great tourism opportunities to the area and be our savior. We were told at a conference in Alpine, AZ a couple of years ago, by the most prominent ecotourism operator in Yellowstone National Park that his wolf tourism business will never equal what his elk hunting revenues used to be, and he is in a prime tourism spot to boot, whereas the Gila is



isolated and remote and will never present the tourism opportunities that they have there.

I just received a request for more information on my elk hunting here in the Gila from a father and his two grown sons who want to hunt elk here because where they used to hunt in the Selway-Bitterroot Wilderness in Idaho, the wolves have decimated the elk herd. I am having a real hard time bringing myself to telling them that we have wolves here and can't guarantee the future of elk hunting in the Gila Wilderness because it sometimes takes a few years to draw a license. As the word gets out and our success rates go down we will be in the same boat as our outfitter friends up north. I don't foresee that even if we get to a set number of wolves to have them de-listed, that the states (NM & AZ) will get control and be able to keep wolf numbers at an acceptable level that will ensure the health of our elk herds. As is happening up north they have been officially de-listed but the states still cannot control or hunt excess wolves because it is being studied for another year and or tied up in the courts by the extremist pro-wolf groups.

**#4. Direct release into the secondary recovery zone or the Gila**, is going back on the promises of the original wolf release officials, made to the rural residents here. We were told from the start that direct release would be made into the primary recovery zone and that the wolves there would be allowed to roam over into the secondary release area naturally. It was very soon that "low and behold" they had a clause in the fine print to allow problem wolves to be re-located (released) into the secondary recovery zone. Now this is not good enough for this experimental, non-essential program. They want to direct release wolves into the secondary recovery zone as well as letting **the wolves roam outside of both the primary and secondary recovery zones**. This is an un-acceptable solution to not only the safety and well being of rural residents of New Mexico but to the ranchers whose livestock herds will not only continue to be decimated but expand out to many other ranchers. It is also unacceptable to the health of our ungulate herds of elk and deer, whom our hunting community and the related economic activity generated, so heavily depend on here in this area.

**#5. Habituated wolves** in the BRWRA present a very real and present danger to humans and the FWS needs to come out publicly and admit so, and start undoing the many years of not properly warning the general public to the real and inherent dangers of these pen-raised, man-handled wolves, and their offspring who learn from their habituated wolf parents, that have no fear of humans or human scent. The FWS needs to immediately post warning signs throughout the introduction area, warning people of the inherent dangers these wolves are demonstrating, in an ever increasing amount of encounters.

**#6.** The continued call for **ranchers to remove livestock carcasses** or render them unfit for wolf consumption is not based on any research or scientific study or proof, that fortifies the pro-wolfers position that this is the main cause for wolves to start depredating on livestock. Wolves are opportunistic and habituated wolves will revert to livestock killing because they are easier to catch and provide an ample prey base, where as elk numbers are sporadically scattered and are harder to catch and kill except in the spring when they have a big impact on baby calf elk.

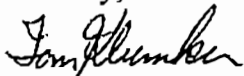
#7. **SOP 13** needs to be strengthened and kept as a true three strike rule with definitions and standards set to further speed up and avoid confusion so that the livestock killing wolves will be removed in an orderly and timely fashion. The pro-wolf community would like to see this rule relaxed including NM Governor Bill Richardson and the resulting direction he is giving your co-operating partner, the NM Game & Fish Dept. This is bringing confusion and undue influence to SOP13, which needs to be fortified, not relaxed or done away with. Ranchers in the wolf recovery area are being unduly and significantly harmed as it stands now and to make them sacrifice even more is untenable.

#8. **“When Do Wolves Become Dangerous To Humans?”** by Valerius Geist should be required reading to all wolf staff in the FWS as well as the AZ and NM Game Departments. The assumption by many scientists that wolves are harmless and of no danger to humans needs to be re-assessed and be incorporated in any future FWS wolf program actions. This dissertation by Dr. Geist is very thoroughly researched and documented and also his **“Statement by Valerius Geist pertaining to the death of Kenton Carnegie”** vividly points out how habituated wolves were responsible for the first human death by so called wild (habituated) wolves in North America in recent times. He also documents other killings by penned wolves and also attacks by wild wolves on humans in Canada the last few years including one attack in 2007. It is time for the FWS to finally get past the old tired notion that wolves are not dangerous to humans and to make this a high priority issue to keep someone from getting injured or killed in the BRWRA. The big number of habituated wolves in the BRWRA makes the urgency of pro-active measures by you the FWS even **more urgent**. The time is now and is of the essence!

**#9. Disclaimer**

My recent experience in the Gila Wilderness on Nov. 5, 2007 has put the fear of God (and of your wolves) in me as a real and present danger. I spend up to 90 days a year in the Gila Wilderness and I will never go in there un-armed again. (or for that matter, anywhere in the Gila) I think I know wildlife and wildlife behavior in the BRWRA as well or better than anyone, because it is not only my profession by my passion, and I spend a big share of my life in the woods with wildlife.

Sincerely,



Tom Klumker

RECEIVED

DEC 26 2007

USFWS-NMESFO

12/6/07

To: Brain Milsap  
State Administrator  
US Fish Life Service  
New Mexico Ecological Service Field Office  
2105 Osuna NE Albuquerque, NM 87113

From: Brenden Arenivar  
4845 N. Vinton Rd.  
Anthony NM. 88021

I think that the wolves should stay in the wild. The wolves should live free. Zoos are horrible!! They can not live normal, healthy, free lives. Putting wolves in zoos is depriving them of a normal life. Wolves can not be reintroduced into the wild after being in a zoo because they become dependent on humans for food. Putting wild wolves in zoos is not ok, because the animals go into depression, and go into a sense of brain wash while living there life in captivity. Wolves can be monitored in there natural habitat better in the wild than in zoos. The wolves can be monitored by GPS chips, monitors, or even command posts. I think that the wolves should still be protected in the wild from hunters and human interference. I also think more wolves should be brought in to help this pack of wolves to increase in numbers. It is your job to keep these wolves in a natural environment to roam free. Wolves deserve to live in the wild, NOT ZOOS!! I am interested in finding out what happens to the wolves. Please contact me with information!!

(email) bigbadbjja@msn.com

A Concerned Citizen,  
Brenden Arenivar  
(GHS student)

*Brenden Arenivar*

Attn: Mexican Gray Wolf NEPA Scoping

December 8, 2007

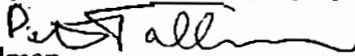
To: Brian Millsap, State Administrator  
US Fish and Wildlife Service  
New Mexico Ecological Services Field Office  
2105 Osuna NE  
Albuquerque, NM 87113

Sir,

I am a resident of Catron County, and fully support the reintroduction program. I believe wolves are an essential component of a healthy ecosystem, and efforts should continue to enhance their viability. In particular, the recommendations of the Paquet Report should be implemented as soon as possible.

I see the wolves as an economic asset for the county, as hunters and tourists should be drawn to 'wolf country'. I do not want the recovery program held hostage to the interests of a handful of public lands ranchers. Montanans and Minnesotans have found ways to coexist - New Mexicans can too.

Thank you for considering my opinion.

  
Peter Tallman  
HC 61 Box 435  
Glenwood, NM 88039

P.O. Box 278  
Glenwood, NM 88039  
Dec 9, 2007

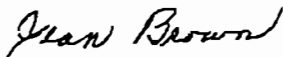
John Slown  
U.S. Fish and Wildlife Service  
New Mexico Ecological Services Field Office  
2015 Osuna NE  
Albuquerque, NM 87113

Dear Mr. Slown:

In the wolf restoration program – there are areas I would like to see changed:

1. Allow people to defend their pets – especially on their own property
2. Allow people to shoot wolves when they are following them in the wild. A wolf who is following me today may kill me tomorrow!
3. Keep wolves away from schools, villages, and areas that are not natural to 'wild' wolves. As of this date we are keeping an armed deputy on guard at the school grounds during recess in Glenwood because a wolf is there watching them. This wolf should be disposed of before it harms one of our children.
4. Reimburse ranchers and businesses for their full losses. If we can spend \$18 million to put 60 wolves in our forests in Arizona and New Mexico (along with many more millions in other states) we should be able to pay for the losses to our people in our communities due to the wolf re-introduction program.
5. Reimburse for damage to humans due to wolf attacks, including loss of income, full liability equivalent to that paid for premeditated damage to humans in other situations. Be responsible for loss of life when people are killed by wolves. Process judicial cases outside of federal court.

Sincerely,



Jean Brown

**Toni Broaddus**  
PO Box 105  
Magdalena, NM 87825

December 9, 2007

John Slown  
US Fish & Wildlife  
New Mexico Eco Services Field Office  
2105 Osuna, NE  
Albuquerque, NM 87113

**Certified Mail RRR #**  
**7004 1160 0007 4061 6922**

**Re: Wolf Scoping Comments**

Dear Mr. Slown,

I attended the scoping meeting held in Socorro at Macy Center.

In my opinion, (1). If a person observes a wolf threatening or attacking a pet, that person should have the authority to kill the wolf. (2). The current policy is that if a wolf is attacking livestock on public land, they are protected ... it is my opinion that there should be authority to kill the wolf there, the same as if the situation is happening on deeded land.



Toni Broaddus

NMESFO: John Slown

MARION SEYMOUR  
2300 W. ALAMEDA ST. D2  
SANTA FE, NM 87507

**Benjamin Tuggle, Regional Director  
US Fish and Wildlife**

**Dear Mr Tuggle,**

**The following is a letter I submitted to the Albuquerque Journal for publication. I am in full support of the reintroduction of the Mexican Grey Wolf into the Gila Wilderness area. I would appreciate A response from your department.**

I commend the Albuquerque Journal for printing the article by Dave Parsons on The Mexican Grey Wolf and its reintroduction into the Gila Wilderness. I traveled with him on a recent trip to learn about this amazing part Of New Mexico

You also printed an article on Dec 2 "Wolf-Proof Shelters Ordered".

It is distressing that so much fear is being promulgated around wolves in the wild and their danger to humans.

The facts do not substantiate these fears.

People driving while under the influence of drugs and alcohol pose a far greater threat.

What is the message we are giving to our children?

Are they also learning about the ecological benefits that wolves bring to the environment?

In Yellowstone National Park, where wolves have been reintroduced, a resurgence of diverse plant and animal life has been observed.

Wolves prey on Elk and keep that population in check. Elk eat young willows and cottonwood which if left to grow to maturity are home to birds. Beaver have returned due to these trees. I intend to send my comments to the U.S. Fish and Wildlife Service. They need to be taking a broad view of the situation, and not be swayed by "the fear factor".

Marion Seymour

seymour.marion@gmail.com

Dec 10-07

Printed Dec 12<sup>th</sup>  
Journal North

Attn: Mexican Gray Wolf NEPA Scoping  
Brian Millsap, State Administrator

Dear Sir;

I would like to know that the Mexican Gray Wolf has been restored to its rightful place in the Az. & N.M. wild ecosystems.

Having been eradicated by the demands of domestic livestock ranchers, hunters and uninformed humans who do not know or care about the value of predators to the balance of nature, has been out of whack for too very long.

Suitable habitat where there is enough wild prey, free of domestic animals and humans is certainly the best place to give the wolves a real chance to live wild.

Human population sprawl and less and less wilderness pose a real threat to the wolves unless the USFWS will act promptly to get the wolves into ideal habitat that is protected now and for the future.

Waiting while humans squeeze away more and more habitat is unacceptable.

Sincerely,

*Mrs. Joseph Schatz Jr.*

Mrs. Joseph Schatz Jr.  
POB 23  
Rodeo, N.M.

December 11, 2007



✓  
Susan F. Weiss  
P.O. Box 1192  
Corrales, NM 87048  
505-898-6891  
[sjfw@juno.com](mailto:sjfw@juno.com)

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

December 11, 2007

Attn.: Mexican Gray Wolf NEPA Scoping

Dear Mr. Slown:

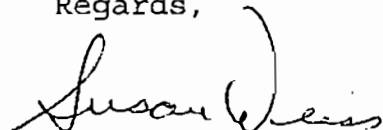
The ongoing execution of the reintroduction project regarding the Mexican gray wolf is doomed to fail under the current rules and is abusive to the individual wolves that are manipulated in the name of the project. Despite all of the well-intentioned human effort that has gone into the project, wolves are released, removed, caged, transported, penned, shot, made to disappear. They are pawns, victims, in a contemporary societal conflict.

To make this project worth continuing, the following modifications must, in my opinion, be made:

1. Change the rules so that the Mexican gray wolf is designated "a fully endangered species";
2. Increase public education and enforcement of regulations and make an all-out commitment to the success of these tasks.

If the agencies that are undertaking this project do not make these changes, then forget the whole thing. Scrap it. Stop cheating the public. Stop cheating the wolves. Stop pretending to try to accomplish something positive—under the current program, it is impossible for the U.S. Fish and Wildlife Service to meet its goal of establishing a self-sustaining population of more than 100 wolves in the wild.

Regards,



Susan Weiss



# Carlsbad Soil & Water Conservation District

3219 S. Canal, Carlsbad, N.M. 88220 • Phone: 505-628-1532 • Fax: 505-885-5386  
swcd@carlsbadsoilandwater.org

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December 11, 2007

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,

The Carlsbad Soil and Water Conservation District (SWCD) offer's several suggestions/comments to the Mexican Wolf re-introduction:

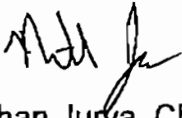
Carlsbad SWCD is opposed to the reintroduction of the Mexican Grey Wolf (*Canis lupus baileyi*) into the Experimental Population Area. The proposed area has locales with denser population than the current recovery zones. There have been many reported incidences of unfavorable human/wolf interaction within the recovery zones, some of which have video taped documentation. If these wolves are coming into contact with humans in an area with very sparse population, how many more incidences will occur in areas with more people? In Catron County, because of the numerous incidents (28) by an individual wolf (AM793), enclosures are being placed around rural school bus stops to protect the children. Is this an acceptable way of life for the citizens within the recovery/reintroduction areas? Immediate threats to human lives and livelihood should preside over any animal. We feel that more investigations and precautions should be taken regarding the safety and well being of the general population before the areas of reintroduction are expanded.

Livestock kills or injuries by wolves should be clarified and re-defined. The livelihood of the ranching community as well as the economic deficit created by the loss of livestock should become a factor into the equation of the wolf's impact to its surroundings during the reintroduction. Each individual livestock kill or attack should constitute as an incident. More stringent monitoring or guidance should be sought on wolf incidents to obtain a clear and more accurate understanding of the wolf and how it is integrating into the area it is reintroduced into.

The Mexican Wolf is the rarest, southernmost and most genetically distinct sub-species of the Gray Wolf in North America. Since these wolves are so unique, how is the public assured that the captive bred wolves that are being introduced are a truly genetically *Canis lupus baileyi*. If these wolves are not of a true "Mexican Gray Wolf" genetic makeup, how are the efforts to restore a population of this threatened and endangered species viable when it is assumed the wolf is hybridized before it is ever released back into the wild? More documentation as to the true genetic makeup of the reintroduced wolves needs to be available to the public.

The Carlsbad SWCD submits these comments during the public comment portion of the NEPA document process, because we feel that the health, safety, and protection of the citizens which live within our boundaries need a more accurate and clear understanding of why and how these introductions will impact the safety, welfare and economics of our community.

Sincerely,



Nathan Jurva, Chairman  
Carlsbad Soil and Water Conservation District

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

December 11, 2007

Sir:

The following comments are for consideration in preparation of the draft EIS and the proposed amendment concerning the 1998 NEP final rule for the Mexican gray wolf.

1. There is a problem with Mexican gray wolves released from the captive breeding population into the wild of being habituated to humans and human activities. This habituation trait is being passed on to the wild born wolves and the ongoing conflict between humans and wolves will continue into the future as it has always occurred in the past. The Adaptive Management Oversight Committee (AMOC) recommendation to expand the BRWRA into a Blue Range Wolf Recovery Zone and to expand the outer boundaries of the Mexican Wolf Experimental Population Area (MWEPA) will do nothing more than spread the wolf/human conflict over a wider area. The AMOC recommendation to relocate nuisance and livestock depredating wolves from within the MWEPA to any other area of the MWEPA will assure the spread of habituated wolves and greater wolf/human conflict. The BRWRA and MWEPA should not be expanded because of ongoing problems and conflicts between humans/human activities and habituated wolves and also because of the lack of capability of the federal and state agencies to deal with these problems/conflicts due to the agency budget and manpower shortfalls.

2. The biggest conflict between ranchers and wolves is livestock depredations, including horses and stock dogs/pets, and the lack of adequate compensation for the loss of the livestock. The stringent requirements to confirm a livestock kill is very difficult and leads to hard feelings, mistrust, disillusionment, and conflict with the wolf recovery program. The majority of ranchers know what their pre-wolf historical livestock death losses are and the causes of those losses. When livestock death loss increases dramatically with wolf introduction, it is not mere coincidence nor negligent animal husbandry. If a rancher historically had an annual death loss of 1-2% on cows and 1-2% on calves and then, coincident with wolf introduction, the death loss goes up to 4, 5, 10% or more, simple deduction leads me to think that presence of wolves is the common denominator. If society wants wolves, and apparently it does by acquiescence/acceptance of the Endangered Species Act, environmental law suits, court rulings, increased agency spending, etc., then society should pay for compensation of losses unfairly borne by landowners, ranchers, business owners, outfitters, etc. Congress should be lobbied to amend the Endangered Species Act in order to give statutory authority to the US Fish and Wildlife Service to compensate for losses. Legislative appropriations or endowment funds to compensate ranchers for their losses, as well as added expenses for complying with the wolf program, may not cause the ranchers and other affected stakeholders to accept the Mexican gray wolf program, but it would make it more tolerable and not as severe an economic burden as it is presently.

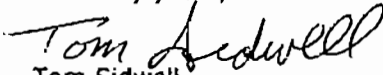
3. Provisions for expanding "harassment" methods should be strongly considered, including the use of electric shock collars, tasers, bird shot, rubber bullets, etc. The use of paint guns may be initially effective however, I think their long-term use will be limited. The wolves need to be conditioned to learn that bad behavior equals pain and good behavior equals no pain. Under the present provisions, habituated wolves have lost their fear of humans and will continue to do so until new provisions will make it possible for wolves to equate humans and human activities with a painful experience.

4. The proposal to drop the designation of White Sands Missile Range as a wolf recovery area due to insufficient size and lack of prey density, seems to be doublespeak for: "The Department of Defense won't let us play in their sandbox". If prey density is a criteria for

designating recovery/experimental population areas, then I think Quay, Curry, Roosevelt counties, and a big part of eastern and southeastern NM also meet that criteria as these counties **do not have adequate prey density** to sustain a wolf population. Also if "problem" and "nuisance" wolves are relocated from within MWEPA to the above mentioned counties, their habituated traits will result in more livestock depredations, loss of domestic pets, and increased wolf/human conflicts due to the lack of adequate prey to sustain them. These counties should be excluded from the MWEPA.

Thank you for your consideration of these comments.

Sincerely yours,



Tom Sidwell  
6237 Hwy 209  
Tucumcari, NM 88401

Cc:

The Honorable Pete V. Domenici  
United States Senate  
328 Hart Senate Office Building  
Washington, D.C. 20510-3101

The Honorable Jeff Bingaman  
United States Senate  
703 Hart Senate Office Building  
Washington, D.C. 20510-3102

The Honorable Heather A. Wilson  
United States House of Representatives  
442 Cannon House Office Building  
Washington, D.C. 20515-3101

The Honorable Steve Pearce  
United States House of Representatives  
1607 Longworth House Office Building  
Washington, D.C. 20515-3102

The Honorable Thomas Udall  
United States House of Representatives  
1410 Longworth House Office Building  
Washington, D.C. 20515-3103

Office of the Governor  
490 Old Santa Fe Trail  
Room 400  
Santa Fe, NM 87501

Senator Clinton D. Harden  
1348 CRH  
Clovis, NM 88101

Representative Brian K. Moore  
Box 56  
Clayton, NM 88415

Quay County Board of Commissioners  
Tucumcari, NM 88401

December 13, 2007

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

Re: Mexican Gray Wolf NEPA Scoping

Dear Sir:

The following are my comments regarding the USFW request for public input on changes to the rules governing the Mexican Grey Wolf Reintroduction project.

1. Change the current classification of "experimental, non-essential" to "endangered".
2. Expand the initial release area to anywhere within the Blue Range Wolf Recovery Area (BRWRA).
3. Rules should provide for changes that would enable future location options for release of wolves in addition to just within the BRWRA.
4. A very large change, which is probably not practical, either politically as or economically, would be to enable privately and publicly funded projects to buy out the permittees and retire the grazing permits. I would be happy to be a contributor.

Yours truly,



Dr. Steven A. Weiss

P.O. Box 1192  
Corrales, NM 87048

corralesweiss@msn.com  
(505)898-6891



December 13, 2007

Brian Milsap  
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 Brian Milsap,

Thank you for the opportunity to comment on the above captioned process. As rural residents of New Mexico, the Grant County Cattle Grower's Association is writing to express the following concerns to be addressed in the final EIS.

- The designation of the wolf population as a non-essential experimental population should not be changed.
- The issue of human safety and habituated wolves must be addressed. Wolves are staying around homes and communities, threatening children and harming pets and livestock. Habituated wolves need to be removed from the areas where they are performing this threatening behavior.
- The continued feeding of wolves, while it may alleviate a short term problem, only creates longer term problems with wolf habituation.
- The current method of determining wolf depredations does not adequately portray the real amount of harm and cost being done to livestock producers and their families, outfitters, county governments, sportsmen and wildlife.
- Wolf depredation on pets and working dogs needs to be addressed. Anyone should have the right to protect their personal property regardless of where an attack or threatening behavior by wolves may occur.
- Today, adequate compensation programs do not exist and need to be developed to compensate for the losses suffered by *all* those living in the wolf recovery area.
- The boundaries of the wolf recovery area need to stay the same. Increasing the boundaries will only lead to increased wolf interaction with more humans and domestic livestock. There is inadequate information regarding prey bases and the effects of wolves on those populations beyond the established boundaries. Even within the established wolf recovery area, the elk study survey data is too preliminary in terms of numbers of years of data collection to draw any reasonable conclusions. Not enough is known about the effects on the prey

bases with regard to the wolf recovery program to justify expanding the program boundaries.

- Carcasses of all animals which die in the wild are valuable resources for all other animals and plants in the ecosystem. Removal of any type of carcass denies many other species including microorganisms, insects, rodents, birds, etc. food and other important carcass by-products.
- Lethal take must remain an option for managing problem wolves. Further, wolves which have demonstrated habituation behavior and have killed domestic animals should never be relocated or re-released.
- Research by third-party institutions such as land grant universities is important in providing non-biased information to validate and verify processes, procedures and end results of the wolf recovery program. We would like to encourage more third-party research to be conducted.
- The law requires the assessment of the effects of the wolf recovery program on the human populations and their cultures. These assessments need to be done before there is any consideration of expanding the program.

We thank you again for the opportunity to comment. We look forward to an EIS that addresses the concerns of the rural community and that addresses the true costs and impacts of the program.

Sincerely,



Deily Crumpley

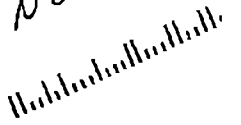
President, Grant County Cattle Grower's Association



Deely Crumley  
P.O. Box 36127  
Fort Buford, NM 88036

Mr. Brian Millsap  
State Administrator, US Fed  
2105 O Street, NE  
Albuquerque, New Mexico

87113+1001-05 ROBI



Marcia Murphy, HCR 74, Box 21013, El Prado, NM 87529

December 13, 2007

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

ATTN: Mexican Gray Wolf NEPA Scoping

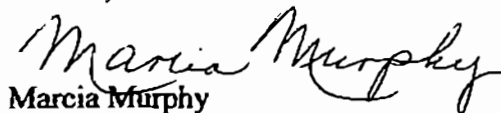
Dear Brian,

I understand that a rule change process is underway that will determine the future of the Mexican Gray Wolf in AZ and NM. As I am not able to attend one of the open houses, I am sending this letter to request that there be an alternative that demands an essential population of the wolf in these two states. The wolf may be the most misunderstood animal in this country and therefore, I think it is vitally important to educate the public to dispel the many myths and unreasonable fears surrounding this animal.

I would also be in favor of funding the agencies responsible for enforcing the law to protect wolves in the wild.

Anything you can do to ensure a bright future for wolf recovery in the Southwest will be much appreciated.

Thanks,

  
Marcia Murphy

December 14, 2007

Mr. John Sloan  
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. Sloan:

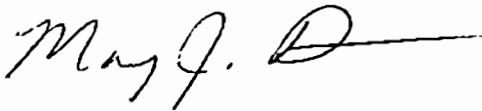
I am submitting my input on the proposed changes to the Mexican gray wolf reintroduction project. First, I'd like to voice my support for the wolves. The Fish and Wildlife Service should be doing everything in their power to successfully reintroduce the wolves into a truly wild environment and take all steps necessary to ensure their survival in the wild. It is time to re-take public lands for the benefit of all, which includes providing habitat for endangered native species.

I am appalled that the federal government continues to put the welfare of a few individuals above the enacted national interest. I am appalled that a trek through designated wilderness means that I encounter cows and cow pies instead of native species. I am appalled that Catron County killers continue to interfere with the introduction of the gray wolves, with no apparent consequences. I am appalled at the ignorance of the local (human) population.

I specifically request that you:

- Include and adopt a Conservation Alternative that will change the classification of the reintroduction effort to "experimental, essential."
- Remove all restrictions for natural wolf movements.
- Allow "taking" of a wolf only in the event of an actual attack on a human.

Sincerely,



Mary J. Davis  
P.O. Box 1736  
Tijeras, NM 87059

HC 62 Box 654  
Reserve, NM 87830

December 14, 2007

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

Dear Brian Millsap,

I am a resident of Catron County and I am in favor of the S. W. Wolf Recovery program. I am sick of publicity stunts by Catron County officials such as wolf proof shelters for school children. I have not yet seen a rural family drop off their children in a remote spot to wait for a school bus alone and unprotected. Parents sit with their children in their vehicle and wait for the school bus. I know as I, along with other parents, did just that even before the wolf became an issue at horse springs.

The wolf program has many positive benefits for the county and it should be allowed to continue. The only aspect of the program I have a problem with is it's management. This management seems to be about placating program opponents. Yes, wolves kill cows but so do lots of other things like cars and people. Wolves are carnivores so let them be wolves. Harass them, yes, but move them around, break up packs, kill them, no! Instead, pay off the livestock owners with no argument. After all, the bottom line is the dollar and payments will gain acceptance of the program.

Thank you.

Respectfully,

  
Stephen Rowe

December 15, 2007

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

Atten: **Mexican Gray Wolf NEPA Scoping**

Dear Mr. Slown,

This letter is written in support of the wolf survival plan in the wild. The classification of the Mexican gray wolf should be changed to *experimental essential* to reflect the urgency of protecting this beautiful, endangered species.

Research has determined that their territory needs to be expanded to allow them to find enough good habitat and prey. Wolves are deathly afraid of people and will keep their distance. Therefore no exclusions of geographic areas should be allowed. For long-term continued success, the area for initial release also needs to be expanded so wolves are put into areas where they can find potential mates.

In addition, conflicts with ranchers need to be resolved. One solution would be to require ranchers to quickly remove dead stock that attracts wolves to their property. Or better yet they could raise buffalo instead of cattle, bringing back the original mix of native animals to our state.

Most important the recovery plan needs to be revised. It has not been amended in 25 years and does not include objectives for full recovery of this endangered species. The number to "take" (killing wolves) needs to be substantially reduced. The original goal was to have *at least* 100 wolves, including 18 breeding pairs, in the wild by the end of 2006. We have fallen way short of this goal with only 59 wolves and 6 breeding pairs.

I urge you make the above mentioned changes to the rules governing the Mexican gray wolf reintroduction project. Thank you for your efforts to ensure the long-term success of this magnificent animal in New Mexico. Please keep informed of future developments.

Sincerely,



Karen Leach  
5 Calle de Oro  
Tijeras, NM 87059  
Karenleach7@msn.com

c: Governor Bill Richardson  
Senator Jeff Bingaman  
Representative Tom Udall  
Representative Heather Wilson

State Representative Kathy McCoy  
State Senator Sue Wilson Beffort

N Cross Ranch  
PO Box 450  
Cliff, NM 88028  
575-535-4174  
jthollimon@starband.net

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

Dear Sir:


I have a BLM lease also State Land lease as well as private property. The cattle that graze my ranch including all leases and private are my private property. I have the right given in the constitution to protect my private property.

When a wolf kills domestic livestock they should not be relocated to another Place. Why take ones problem to someone else? Too much of a ranchers time is taken by trying to protect our livestock from wolves.

I believe the main purpose of wolf reintroduction is to speed the decline of ranchers in the west. Not only on federal land but on private land. This will cause more sub dividing of private property to re coop our investments.

Those wolves that stay around ranch headquarter or camps where people live or work should be removed permanently not relocated somewhere else. If a child or adult is killed by a wolf so goes the wolf program. People should be considered before the wolf. People will join together to address the problem THE WOLF.

Sincerely,



J.T. Hollimon

Dec. 16, 2007

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

ATTN: Mexican Gray Wolf NEPA Scoping

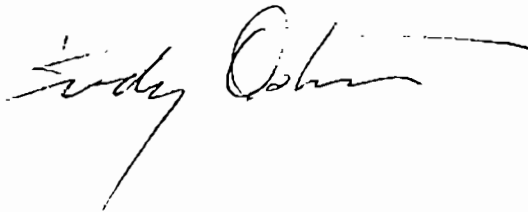
Dear Mr. Millsap,

I live in far northern New Mexico and was unable to attend any of the scoping meetings regarding rule changes that will affect the Mexican Gray Wolf. I would like to express my deep concern for the survival of the remaining wolf population in the wild and hope you and your staff will seriously consider rule changes that would allow wolf releases in the Gila and elsewhere to establish a viable reproducing population.

Rule changes that allow wolves to expand their territory outside the Blue Range Recovery Area will be critical for the long term recovery. The cooperation of livestock operators who use public lands for their business is also crucial. These individuals are profiting from a public resource and must be asked to do their part in ensuring that ecosystem's future health and stability through carcass recovery/disposal to prevent wolves' from becoming habituated to feeding on livestock.

Thank you for your consideration,

Judy Osburn  
PO Box 48  
Ocate, NM 87734

A handwritten signature in cursive script that reads "Judy Osburn". The signature is written in black ink and is positioned below the typed name and address.

From: Steve Darland <darland@riolink.com>  
Subject: Mexican Gray Wolf NEPA Scoping  
Date: December 17, 2007 6:59:31 AM MST  
To: r2fwe\_al@fws.gov  
Cc: Margot Wilson <margotwilson40@hotmail.com>

Attention: John Slown and Brian Millsap

Count us as ones who believe Nature knows more than government, especially as it concerns wild heritage animals like the Mexican Gray Wolf.

In short, we believe we should stop killing them, revise the recovery plan, expand the number of wolves in the wild, keep recovery options open, while finding wise, non-lethal ways to resolve conflicts with livestock.

The Mexican Gray Wolf is "endangered" and should be so classified as they are allowed to expand their territory, including increase into the State of New Mexico.

We are proud, hard-working organic farmers. We believe in Nature. These wolves are part of that and should be allowed to thrive. This would aid in overall balance, which is missing in so many ways, so many places.

Do the right things.

Steve and Jane Darland  
P.O. Box 23  
Monticello, NM 87939  
[darland@riolink.com](mailto:darland@riolink.com)  
575743-0200

(also faxed 12/17/07)



12/20/07

U.S. Fish and Wildlife Service, Attn: Wolf Program  
New Mexico Ecological Service Field Office  
2105 Osuna NE  
Albuquerque, NM, 87113

Elizabeth Miller  
P.O. Box 889  
Cedar Crest, NM 8700

To Whom It May Concern:

My name is Elizabeth Miller and I am writing concerning the endangered Mexican Grey Wolf's (*Canis lupus baileyi*) continued recovery. I urge you to consider this beautiful animal's plight. I recommend uplisting the Mexican Grey Wolf to fully endangered, separately and distinctly from *Canis lupus*, allowing the wolves to roam beyond the current artificial boundaries to find suitable habitat and prey, resolving the current livestock-wolf conflicts in ways that keep wolves in the wild and achieve progress toward reintroduction objectives, revising the service's 30-year-old recovery plan to the recovery objective of establishing a viable/self sustaining population of at least 150 Mexican Grey Wolves within the current geographic scope of the Blue Range Wolf Recovery Area (BRWRA) and with no upper limit on the future number of Mexican Wolves within the BRWRA or any larger geographic area, allowing opportunities to expand wolf reintroduction to other areas in the future, removing all restrictions on the movements, dispersal, and establishment of territories by Mexican Wolves outside the boundaries of the BRWRA, and a provision for maximizing the genetic integrity of the BRWRA population.

The Mexican Wolf once roamed throughout parts of Arizona, New Mexico, Texas, and Mexico. They are the most genetically distinct subspecies of Grey Wolf (*Canis lupus*), and the most endangered Grey Wolf in North America. They are incredibly intelligent; they have intricate social structures and live in family groups with social ranks, as well as complex communications in the form of scent, body language, and vocalizations. Before people came to the Southwest, they also had one of the largest populations of animals in the area. Then, in the late 1800's and early 1900's, the human-caused reduction of the wolves' natural prey such as white-tailed deer and elk caused many of them to begin attacking domestic livestock. This was the beginning of the unjust desire for extermination of wolves in the Southwest, and led to intensive efforts by government agencies and individuals to eradicate them. The federal predator-control program, which also targeted other large predators such as mountain lions, was hugely successful. The wolves' were trapped using snares and steel leg-hold traps. People amused themselves by denning, shooting, and poisoning them. Sodium cyanide was used directly against the wolves and strychnine, arsenic, and compound 1080 were placed in carcasses and other bait. Public bounties were paid for each dead wolf, and by the 1950's, the wolf had been extirpated from the wild. By the 1970's, only a handful of wolves survived in zoos. Although the Mexican Wolf was listed as endangered on the Endangered Species Act in 1976, only an estimated 200-250 survive in the wild today.

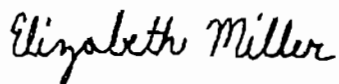
With their listing on the ESA, Mexican Wolves gained attention to their plight, and the wolves' Captive Breeding Program began with the capture of five Mexican Grey Wolves in Durango and Chihuahua from 1977 to 1980. These were the only wolves left in the wild that could be found. They were sent to Arizona, where the Mexican Grey Wolf Recovery Team (formed in 1979) was put in charge of preserving their genetic diversity. In captivity, the wolves began to recover with careful breeding. However, having a captive population of wolves is not enough to ensure their preservation.

Although the Mexican Grey Wolf Recovery Plan, launched in 1982, called for the reintroduction of Mexican Wolves to the wild, it took 16 years of political and legal disputes for the first wolves to be reintroduced to the wild. On March 29, 1998, when there were only 175 wolves in the captive population, the United States Fish and Wildlife Service introduced 11 Mexican Wolves into the Blue Range area of Arizona with the goal of reestablishing at least 100 Mexican Wolves in the Apache and Gila National Forests of Arizona and New Mexico by 2008. At the beginning of 2007, about 50-60 wolves populated the Blue Range Wolf Recovery Area and approximately 300 additional wolves were being held in various captive-breeding facilities located throughout the U.S. and in Mexico. Now, it is almost 2008 and the USFWS has not met their goal.

The Mexican Grey Wolf is only listed as a subspecies under the Grey Wolf, and is considered to be a "non-essential, experimental" population. This allows the Fish and Wildlife service to write rules that override the usual protections for endangered species, and cater to New Mexican and Arizonian ranchers instead of the Mexican Wolves, creating a deadly bias against the animals. In essence, it makes them easier to be gotten rid of, which is the opposite of what the Wolf Reintroduction Program should be trying to do. The Wolf Reintroduction Program includes a set of procedures to deal with "problem wolves": Standard Operating procedure 13, which states that if a wolf or family of wolves kills three livestock animals, they are to be removed from the wild. The wolves are to be captured and relocated, but if they can't be, then they can be killed. Capture and relocation is stressful and often dangerous to the wolf, and nearly 70 wolves have died accidentally or been killed because of this "three strikes" rule. This is not fair to the wolves, as ranchers are compensated for lost cattle by Defenders of Wildlife, an organization committed to helping the recovery of the Mexican Grey Wolf and other endangered species. Often, wolves become accustomed to the taste of beef because they eat dead cattle they find. Because of this, ranchers should be required to either remove dead cattle from their land, or treat the carcasses with lime to make them inedible. The wolves are also currently limited to the Blue Ridge Wolf Recovery Area, limiting how many wolves the area will support. Each wolf pack, consisting of about ten individuals, needs a territory range of 100 to more than 500 square miles. If a pack of wolves try to establish a territory outside the recovery area's boundaries, they are automatically captured and relocated, even if the land is suitable and the animals have caused no problems.

For the Mexican Grey Wolf, major recovery needs are not habitat management and restoration, but primarily education and tolerance. Despite widespread public support for their return, many people are still afraid of wolves or think they are dangerous to people and livestock. The wolves are also often mistaken for coyotes and shot as pests. Continuing funding is needed to conduct wolf research, monitor their activities, sponsor public outreach, prevent and respond to depredation incidents, conduct field surveys to monitor the presence of wild wolves and to evaluate potential reintroduction sites for habitat capabilities, prey base, and potential conflicts with humans. I urge you to work towards the continued recovery of the Mexican Grey Wolf.

Sincerely,



Elizabeth Miller

RECEIVED  
DEC 26 2007  
USFWS-NMESFO

State Administrator  
Albuquerque, NM 87113  
December 18, 2007

Darlene Calvo  
791 Parque Rd.  
Berino, NM 88024

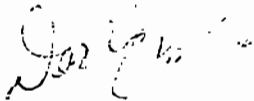
Dear Sate Administrator

I just wanted to say my opinion about the wolves. I do agree that the wolves should be reintroduced out to the world once again since I understand they are being extinct. I believe that the wolves aren't much danger to our environment. I just think that they should be kept in a place where human beings will not be in any sort of danger.

I also believe that cow owners should not have any sort of animals lying around dead on the road, where the wolves are tempted to want meat to eat. I think that they should pick up there dead animals so that the wolves don't get used to wanting to eat meat and putting humans in danger.

In that, I would just like to thank you for your time in reading this letter about my opinion and hopefully something will change and have wolves be reintroduced back into the environment and being free.

Sincerely,



Darlene Calvo

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DEC 19 2007

USFWS-NMESFO

John Slown  
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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DEC 21 2007

USFWS-NMESFO

N Cross Ranch  
PO Box 450  
Cliff, NM 88028  
575-535-4174  
jthollimon@starband.net

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

Dear Sir:


I have a BLM lease also State Land lease as well as private property. The cattle that graze my ranch including all leases and private are my private property. I have the right given in the constitution to protect my private property.

When a wolf kills domestic livestock they should not be relocated to another Place. Why take ones problem to someone else? Too much of a ranchers time is taken by trying to protect our livestock from wolves.

I believe the main purpose of wolf reintroduction is to speed the decline of ranchers in the west. Not only on federal land but on private land. This will cause more sub dividing of private property to re coop our investments.

Those wolves that stay around ranch headquarter or camps where people live or work should be removed permanently not relocated somewhere else. If a child or adult is killed by a wolf so goes the wolf program. People should be considered before the wolf. People will join together to address the problem THE WOLF.

Sincerely,



J.T. Hollimon

## 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.mexicanwolves.org](http://www.mexicanwolves.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.

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DEC 21 2007

USFWS-NMESFO

Comments: FROM GLENWOOD MEETING DEC 5, 2007

DIDN'T SEE ANY "BOARD" THAT MENTIONED  
ECONOMIC IMPACT TO CATRON COUNTY  
BY WOLVES.  
MOST RANCHERS ARE SMALL AND THE  
BULK OF "THEIR" LAND IS FEDERALLY OWNED  
MEANING A VERY COMPLEX PROBLEM OF  
WOLF CONTROL  
THE SCHOOL BOARD IS BUILDING GAGES FOR KIDS  
AT SCHOOL BUS STOPS, THIS IS INCREDIBLE,  
IS ERANT COUNTY NEXT?

Name: William Kuyler

Street: P.O. Box 313

City, State, Zip: TYRONNE NM  
88065

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

DO NOT STAPLE  
Thank you for your input!

**GILA FISH AND GUN CLUB**  
**317 North Mineral**  
**Santa Clara, New Mexico 88026**

**RECEIVED**  
DEC 21 2007  
USFWS-NMESFO

December 17, 2007

Brian Milsap, State Administrator  
U.S. Fish and Wildlife Service  
Ecological Services Field Office  
2105 Osuna N.E.  
Albuquerque, N.M. 87113

RE. Proposed amendment to the 10J rule establishing a nonessential experimental population of Mexican gray wolves in the States of Arizona and New Mexico.

Dear Mr. Milsap:


Thank you for the opportunity to comment on the above mentioned proposal. As active hunting sportsman, we are directly affected by the nonessential experimental Mexican wolf reintroduction program. We desire that our organizational concerns be addressed in the environmental documents needed for compliance with the National Environmental Policy Act. Our organizational comments are as follows:

1. The present status of the program (i.e. Nonessential experimental ) should remain as it is currently. More restrictive designations will not aid in the recovery program and additional restrictions only limit the management operations of the Federal agents charged with management of the program.
2. Additional studies are needed on the impacts of wolves on the existing prey base. The New Mexico Game and Fish Department is well positioned and knowledgeable to undertake these studies if additional Federal Funding is made available.
3. The present program of compensation for damage to private property is inadequate. A compensation program should include pets and wildlife as well as grazing animals. Compensation for wildlife losses could be handled by funding grants to the respective Game and Fish Departments for more intensive management of the prey species. Compensation for pets and grazing animals should be for the fair market value of the animals and include compensation provisions for properly documented reduction in calf crop losses where physical evidence (remains) is lacking. The compensation program needs to be under the direct control of the Fish and Wildlife Service (not a non Federal cooperator) and include a review panel of private and Federal individuals.

4. Carcass removal of dead domestic grazing animals should not be made a requirement. Much of the Wolf recovery area is in extremely shallow soils or wilderness areas where mechanical burial with motorized equipment is not effective or prohibited by law. Burning carcasses is not practical because of wild fire potential in the dry fire prone southwest. Chemical treatment of carcasses is not practical because of environmental problems. If carcass removal is desired, it should be the responsibility of the U.S. Fish and Wildlife Service who have access to aircraft for physical removal. A detailed study needs to be made of carcass removal; if this is undertaken, one will find that the adverse environmental impacts far out weigh any so called wolf program advancements.
5. The supplemental feeding of the free ranging wolves should cease immediately. This only causes wolves to loss their fear of man and hang around areas of human concentration. Areas of human concentration includes private property or homes and hunting and other recreational camps.

We appreciate the opportunity to submit comments prior the preparation of environmental documents and we look forward to reviewing and commenting again once the documents are prepared. We as an organization will be closely following this process.

Sincerely,

  
Deily Crumbley  
President, Gila Fish and Gun Club



2720 Los Lunas  
Los Lunas, NM  
87031

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

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DEC 21 2007

USFWS-NMESFO

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").**

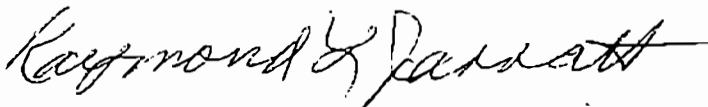
Dear Mr. Millsap:

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,



**ADELE E. ZIMMERMANN**

Rinconada Box 4B  
Embudo, New Mexico 87531  
505-579-4661/870-1322  
[locoadele@cybermesa.com](mailto:locoadele@cybermesa.com)

RECEIVED  
DEC 27 2007  
USFWS-NMESFO

December 25, 2007

U.S. Fish and Wildlife Service  
2105 Osuna NE  
Albuquerque, NM 87113

Attn: Wolf Program,  
New Mexico Ecological Services Field Office

Re: Modifications to Mexican Grey Wolf Reintroduction Program

Ladies and Gentlemen:

For centuries the American West has been held hostage to an extractive industry devoted to the production of beef, otherwise known as "ranching". It has destroyed western ecosystems, unduly influenced western and national politics and steadfastly refused to acknowledge the 21<sup>st</sup> century. It has been so romanticized in written and performing arts as to obscure the ecological devastation which is inherent in its operation.

Ranchers have done their best to sabotage the Reintroduction Program. They have deliberately failed to remove carcasses of cattle not killed by wolves, thereby training wolves to consider cattle a desired prey. They have exploited the irrational fear of wolves, maintaining that their children are in danger on their ranches and even in the streets of their towns. And they have outright slaughtered reintroduced wolves.

I include here the text of a commentary I wrote which was printed in the *Albuquerque Tribune* and the *Rio Grande Sun*:

"Yet another Mexican Grey Wolf has received a terrible sentence: life in prison without possibility of parole. Her crime was being a wolf. She's lucky. Others of her kind have been sentenced to death.

Centuries ago European invaders of North America imported an animal which did not belong on the continent. Its sharp hooves and massive weight trampled native flora and opened lands, particularly streams, to severe erosion and degradation. Its grazing habits encouraged fire-susceptible forest overgrowth while discouraging natural plant diversity.

Less intelligent than native mammals, it was incapable of protecting itself and its young from native predators. Its human caretakers, who were not industrious enough to protect it, opted instead to eliminate the predators.

What resulted was an acute imbalance in a previously harmonious ecosystem. Populations of native animals which had been the predators' natural prey exploded, further endangering the balance of the system. The collective health of prey species suffered as the sick and injured remained alive and their population exceeded their habitat's ability to support them.

Attempts to reintroduce prey species, particularly the wolf, have been met with legal opposition and such strict regulation that the success of the program is in danger. Outright murder of reintroduced wolves and removal or killing of "rogue" animals who dare to prey on the hapless imports puts the survival of successfully reintroduced wolf packs in question.

If we want to preserve the grandeur of the "Great American West" and restore balance to its ecosystems, we must turn our attention to the invasive nonnative species. Remove cattle from our publicly-owned forests and grasslands. Allow wolves and other natural predators to restore the balance necessary for survival of native flora and fauna.

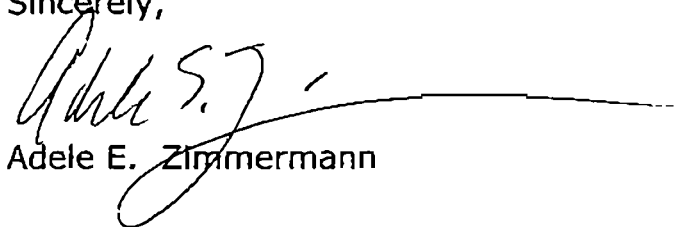
This is not the 16<sup>th</sup> century; it is 500 years later. Haven't we evolved enough by now to find a more humane and less destructive way to feed those who choose to eat meat?"

I propose modifying the Mexican Grey Wolf Reintroduction Program by enforcing existing penalties for killing or otherwise harming reintroduced wolves and for failing to remove cattle carcasses. If necessary, penalties should be increased. Ranchers are subject to the laws of our land, as are any other citizens.

I propose that federal regulations supersede any state, county or municipal regulations that seek to penalize reintroduced wolves for performing their natural ecological functions. Any decisions by lower courts must be appealed to federal jurisdiction.

Rather than weakening the program, I insist that it be strengthened enough to insure its success. The multiple-use mandate for federal lands must include use by native fauna over imported species, and use by citizens who insist on preservation of native ecosystems rather than their destruction by private profiteers.

Sincerely,

A handwritten signature in black ink, appearing to read 'Adele E. Zimmermann', with a long horizontal line extending to the right from the end of the signature.

Adele E. Zimmermann

December 25<sup>th</sup>, 2007

RECEIVED  
DEC 27 2007  
USFWS-NMESFO

**Attn: Mexican Gray Wolf NEPA Scoping**

The U.S. government must promote a larger Mexican gray wolf population and allow the species to increase its range. Barring another reintroduction site (such as the Grand Canyon ecosystem) the Blue Range/Gila population of Mexican gray wolves is the only one in existence. Government agencies have every responsibility to ensure that this population grows. If ignored government funded wildlife agencies violate the mandate given them by the citizens of the United States. The USFWS in particular must act to allow an increase in the minimum population, allow Mexican wolves to expand their range and open all possibilities to the conservation efforts.



Shane Fitzpatrick  
3537 Calle Suenos NE  
Rio Rancho, NM 87124

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

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DEC 26 2007  
USFWS-NMESFO

Attn. Mexican Gray Wolf NEPA Scoping

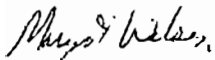
Dear Sir:

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 throughout the Blue Range Wolf Recovery Area region. This animal needs the classification of "endangered" for protection and the area for initial release must include the entire BRWRA, not limited to Arizona only.

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, including watershed degradation, introduction of exotic species and increased wildfire damage. A healthy predatory population of wolves has been shown to improve the biology of our western forests and attracts tourism, with its low impact economic benefits far greater than the supposed economic benefits of grazing on public lands.

Grazing lease holders, unashamed recipients of the public's largess, are bragging of their ongoing baiting and killing of the wolves, a clear violation of federal law, while employees of both the Fish and Wildlife Service and the Justice Department dishonor their oaths of office by their apparently willful and knowing refusal to enforce the law. In these times, it is morally disgusting to see violators of federal law imposing their self-servicing priorities above those of the greater public good.

Yours truly,



Margot Wilson  
PO Box 926  
Elephant Butte, NM 87935

## How to Submit Comments

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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.mexicanwolves.org](http://www.mexicanwolves.org)
- Faxed comments may be sent to (505) 346-2542

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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!**

**As one who helped raise the first 2 Ganis lupus bailey pups released from the Ghost Ranch lineage, beginning in 1971, I am firmly pro-wolf (as far as individual and population survival are concerned. Norma Ames and I**

## Comments: Continued

felt this was vital in that Roy McBride estimated the 50 wolves remaining in the wild in Mexico had no chance for survival. Captive breeding of C.I.B. was the only chance to prevent extinction. I am proud of our efforts, BUT that does not mean that I favor the US F & W Svc. ill conceived, poorly implemented wolf reintroduction into the Blue Range Wolf Recovery Area. This is NOT a National Park, like the Yellowstone reintroduction area. The unsigned "Comments to Save Mexican Gray Wolves" document contains several proposed rule changes which are open-ended, and if carried to extreme, could severely damage human interests and cause private land hardships. The "Comments" document is bogus, and reads like a manifesto of the Defenders of Wildlife or Center for Biological Diversity. Both favor wolf expansion, but stand to suffer no losses. **THINK** : Every year many bears are immediately removed from the Sandia foothills, even though they have caused no damage! There mere presence is viewed as a threat by the urban public. Yet rural land and livestock owners are expected to suffer repeated traumatic losses of their animals, without immediate, realistic recourse. The current "3 kills before you are out" rule is unworkable as a remedy, and yet the proposed rule changes advocated less "take" of offending wolves, as well as "no maximum population limits" and "no exclusion of geographic areas" and "no limits on future options". Private property owners have an inherent right to prevent and stop damage to their interests and livelihood. **Find ANOTHER LOCATION, 100% public lands, military withdrawals, etc.**

**Again, THINK: unlimited wolves, any geographical area, unlimited options, etc. could well be YOUR BACKYARD.**

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DEC 9 6 2007

USFWS-NMESFO

Name: PARRY LARSEN

Street: P.O. Box 458

City, State, Zip: EL PASO

BUTTE, NM. 87935

**CERTIFIED WIDOWIFE BIOLOGIST**

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

**Professor, Natural Resource Management,  
DO NOT STAPLE Retired**  
Thank you for your input!



## CUBA SOIL AND WATER CONSERVATION DISTRICT

(505) 289-3950 ■ P.O. BOX 250 CUBA, NEW MEXICO 87013

December 26, 2007

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

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DEC 27 2007  
USFWS-NMESFO

Dear Mr. Milsap:

### MEXICAN GRAY WOLF REINTRODUCTION

I write for the seven-member Board of Supervisors of the Cuba Soil and Water Conservation District, to express our opposition to your proposed establishment of a Non-essential Experimental Population of the Mexican Gray Wolf in New Mexico and Arizona.

For some twenty-five years or more, your agency has been studying, planning, and reviewing the reintroduction of the Mexican Gray Wolf. Thousands of man hours, and countless thousands of dollars have been spent in this endeavor.

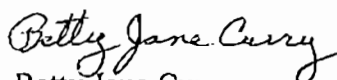
With all this study, all the documents, all the various reviews of your project, you state that you still are short of your goal of 102 wolves and 18 breeding pairs, with only 59 wolves and 7 breeding pairs at the end of 2006. It is time to realize that this is not a profitable, nor a successful venture.

What you are trying to do is re-create the past. You cite specimens from 1916 and earlier. The habitat of 2007 is much different; the prey species is different; even the wolves that you plan to introduce are different. They are raised by humans and expect to be fed by humans. They are not the wolves of 1916 and earlier. Today's wolves have no fear of humans or human habitation. The depredation of livestock and pets is a common result. When an owner finds one of his animals dead and reports it to the Game Department or your agency, it is often some time before an officer arrives on scene. Then it is difficult to judge whether or not the depredation was caused by a wolf, and often the owner receives no compensation, even if the death was the result of a wolf kill.

You state that you coordinate with State, County, local and Federal partners; with Tribal partners; with Mexican authorities. You do not mention private landowners (taxpayers), whose land and property will be affected by the introduction of the wolves. The Game Departments and the Federal agencies do not own livestock. The Tribal governments are sovereign and if their members lose livestock, you will surely reimburse them. Private landowners are those most affected by your proposed Non-essential, Experimental Population of the Mexican Gray Wolf, and their rights should be respected.

You describe rules affecting private landowners who might "harass" or "take" the wolves if they are found on private property. The Constitution gives citizens the right to defend their own property. It is not for a Federal agency to deny that right.

Very truly yours,



Betty Jane Curry  
Supervisor



December 26, 2007

Briaan Milsap  
U.S. Fish and Wildlife Service  
Ecological Service Field Office  
2105 Osuna NE,  
Albuquerque, N.M. 87113

RECEIVED

DEC 28 2007

USFWS-NMESFO

Dear U.S. Wildlife Service of New Mexico:

To date your desired conditions fall very short from the conditions that exist for the Mexican Grey Wolf recovery program. 1.) Livestock depredation is substantial and localized especially in Catron County. 2.) Conflict with private land owners is no longer incidental but frequently repeated. 3.) Captivity of the wolves outside the recovery area is frequent. This results in cruel stress and often death to the wolves and excessive cost to your program. 4.) Public support to those directly affected by your program has met with a high degree of opposition. 5.) Depredation of Elk, Deer and other wild animals is significant.

I therefore disagree with your current proposed action because it does not address these problems. I propose the following changes for the wolf recovery program. I suggest that the Mexican Grey Wolf be allowed to expand its territory with no restrictions to its dispersal and movement; and thus no exclusion of geographic areas from occupation by wolves. This would decrease the concentrated number of wolves in certain areas and hopefully decrease conflict with these land owners that are repeatedly harmed emotionally and financially by the wolves. This expansion of territory would only be successful if the number of wolves in the population did not exceed your desired condition of 100 wolves.

Yours very truly,

*Marinel J. Poppie DVM*

Marinel J. Poppie DVM

P.O. Box 188

Glenwood, New Mexico 88039