

**Connie Adler**

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Silver City, NM 88062

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Silver City  
NM  
complete  
Evan Paulby 31508

## Comments on Wolfe Reintroduction Program, December 2, 2007

TO: Brian Millsap:

I am writing to ask that the guidelines of the reintroduction program be revised so that this very necessary program is successful. The target goal for the program was to have 100 wolves in the area, the latest count shows that there are only 30 wolves remaining. In the past weeks orders have been given to remove three more, two of them females with pups, worse the order stated if they could not be easily trapped to shoot them. This is not the path to a successful program. Wolves belong in the forest and are necessary for our ecological system to return to a healthy balance. Every step of the way their reintroduction has been sabotaged by extremist politics and scare tactics. It is time for this to stop and for Fish and Wildlife to make changes to the guidelines that will help the reintroduction program to succeed. Please:

- Put an immediate end to removing wolves from the wild (trapping or shooting) until population goals are reached.
- Update the Mexican wolf recovery plan with new science and numerical targets for removing the wolf from the endangered species list. (The current plan hasn't been revised since 1982, before the discipline of conservation biology emerged, and contains no numerical goals for recovery).
- Allow direct release of wolves from the captive population into the Gila National Forest (currently only allowed after wolves have initially been released into Arizona).
- Allow wolves to roam beyond the boundaries of recovery area. (Currently they are captured and returned if they cross the boundaries, even if they aren't causing any problems).
- Require livestock operators who lease public lands in the wolf recovery area to practice responsible husbandry practices, such as disposal of carcasses, seasonal (versus year-round) grazing, using penned calving areas, etc.
- Resolve livestock-wolf conflicts over the long term through a voluntary grazing retirement program that allows ranchers to relocate their livestock operations to wolf-free areas.
- Promote better understanding of wolves through fact-based education programs, especially in communities within the wolf recovery area.

Thank you for considering these suggestions.

Connie Adler, Silver City, NM

Connie Adler

(PS: In a camper, binder, folder, hold biologist etc. the balls safer knowing wolves are part of the wilderness)

Thank you for your support on this issue + for your great work - Kathy C. Boett

are not, under normal conditions, a danger to people.

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RECEIVED

NOV 21 2007

USFWS-NMESFO

12/4/07

Dear Brian Millsap,

Thank you for taking comments on the Mexican Wolf Recovery Process.

I very definitely feel that the Mexican Gray wolf is an important member of our South western ecosystems. I feel we need to do all we can to educate the public to help them understand the wolf's presence in Arizona and New Mexico is better for the long-term vitality of our environment AND not ~~the~~ the wolves

✓  
60 Bear Mountain Road  
Silver City, NM 88061  
December 9, 2007  
[slppt@cvbermesa.com](mailto:slppt@cvbermesa.com)

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

Dear Mr. Millsap,

We support the wolf recovery project and do not support the killing or recapture of wolves. We understand that wolves have only recently been reintroduced into their historical environment. The public has not had much time to adjust to this change and therefore some members of the public are fearful. This is not an unusual response, but public policy must be developed based on fact and the importance to have a balanced ecological system which requires large predators to exist.

We appreciate the opportunity to submit our comments.

Sincerely,  
Sue Ann Childers  
Randy Harkins

*Sue Ann Childers*  
*Randy Harkins*

December 11, 2007

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

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DEC 12 2007

USFWS-NMESFO

Re: Mexican Gray Wolf, scoping process

Dear Mr. Slown,

Thank you for the opportunity to comment on the next phase for the Mexican Gray Wolf. I have participated by writing letters and attending meetings in the past nine years. Looking back, I see little progress for the species and continued hardship for the local economies. I live on the fringe of the Gila Wilderness, at the Gila Hot Springs and frequent the forest and wilderness. Our family was affected by a wolf depredation in June of 2000 and I have witnessed wolves loitering around our wilderness camp sites. My comments are based on what I have seen or experienced and not emotional drive.

I do not want to see the classification of the Mexican Wolf changed from the current "experimental, non-essential". The wolf is NOT essential to maintain a balance in our local environment which has plenty of predators already.

The release of wolves should continue to be limited to the BRWRA. Wolves released into the Gila Wilderness have traveled to the populated fringe in short order. The wolves appear to be habituated and not interested in living in the wild. Expansion of their territory would only spread your resources thinner and annoy more citizens.

Under your current rules, a wolf can have three livestock violations in one year and then the counter is reset. It should be three strikes and they are out. Livestock-wolf conflicts are a jumble of confusing regulations, including what does and does not constitute livestock. Add to that, public and private land regulations and it is tough to keep up. You can protect your horse on your land, but in the forest or wilderness you cannot. If it is your prize hunting dog, he is wolf feed whether he is in your front yard or with you in the forest. The protection you have afforded the Mexican Gray Wolf is exteme to say the least and has placed local citizens and their personal property below that of the wolf. Wolves should be subject to the same laws that apply to all other predators. If the wolves were eating domestic pets in Albuquerque and Santa Fe, support for the wolf would plummet. People that are misinformed and unaffected find it easy to defend the wolf when they are not suffering the consequences.

Human-wolf conflicts will continue until changes are made in the handling of wolves. There is no doubt, wolf habituation, is a major problem and the root of the programs failures. Dependence on humans, supplemental feeding, trapping and handling all result in a familiarity with people. Anyone who has left food out for a wild animal, knows how quickly the animal adjusts to the welfare provided. Why would the wolf be any different? The wolves need to be wild in order for this reintroduction to succeed. Wolves that show habituation behavior need to be removed and not released again.

Perhaps the greatest negative impact of the wolf is to the rural economies of southwest New Mexico. Elk and deer hunting is a major source of income to local outfitters, ranchers, motel owners, gas stations and all who supply them. The NMG&F has reduced the number of elk permits, in the last three years, on public and private land. This permit reduction is a result of declining elk herds, which I believe can be attributed to predation, mostly on the young, during the drought years. The wolf is another predator in an already precarious (supposed) balance of nature. How can we sustain our current elk/deer herds with the proposed population of 100 wolves? Nothing is being done to improve the habitat of the elk and deer that provide food for the wolf, and income for local economies.

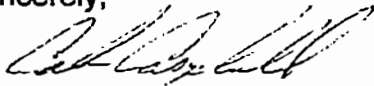
Money being wasted on the wolf could be used to repair water units in the wilderness, or other habitat improvement that would have a direct effect. I can assure you, the wolf has not provided the "positive" in tourism that some suggested it would.

The wolf is the latest in a long line of federal mandates that have resulted in the loss of the logging industry, restrictions to grazing on public lands and other ESA designations. Recent memory brings to mind, gila trout, the spike dace and loach minnows, willow flycatcher, spotted owl and the wolf. The time and energy required to protest these designations and the potential negative impact to your private property or USFS permit, is enough to make many people consider another line of work. The ESA is used by environmental groups to manipulate government programs through litigation. They want to recover the wolf, no matter the cost to society and individuals. The people of southwest New Mexico and their livelihoods, need to be part of the equation.

May I also state that the very people making a determination about the future of the Mexican Gray Wolf have a financial stake in continuing the program despite its failures. I see it again and again in government programs where work is created to justify positions. The Gila Trout Recovery Program is an excellent example. Thirty years of career building and yet no recovery for the gila trout.

As a taxpayer, I am frustrated with the cost of the Mexican Gray Wolf recovery and its meager success. How much longer will we be asked to bear the burden of this "non-essential" experiment ?

Sincerely,



Carla Campbell



Carla Campbell  
HC 68 Box 80  
Silver City, NM 88061

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ATTN: MEXICAN GRAY WOLF 320

December 15, 2007

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

Dear Mr. Millsap:

I am writing this letter in regards to the Mexican Gray Wolf Program and the intent to Prepare an Environmental Impact Statement and Socio-Economic Assessment for the Proposed Amendment of the rules regarding the Mexican Gray Wolf population in New Mexico and Arizona.

I believe the Mexican Gray Wolf Program status is best described in the epilogue of the book: The Mexican Gray Wolf in the Southwest by David E. Brown reprinted and updated by High Lonesome Press. In the new epilogue, Mr. Brown sites all the reasons that the Mexican Gray Wolf program will never work as it is now established. These reasons include having to continually feed the packs because there are no old animals with hunting experience to pass on to the younger members; hybridization with dogs of the gene pool in the breeding stock; and habituation; etal. Roy McBride who probably knows more about the Mexican Gray Wolf than anyone else has expressed many of these same concerns.

I have horses for pleasure riding in the Gila National Forest and dogs as pets around my rurally located home. In addition and most importantly I have grandchildren that visit us on a regular basis. These factors give me great concern over the habituation and hybridization of Mexican Gray Wolf and its lack of fear and respect of humans and human habitation. This is not true wolf behavior as exhibited by the Gray Wolf in Canada, the Northern Great Lake States, and that of wolves re-introduced into the Yellowstone complex. I believe that we as property owners should have greater leeway in dealing with the encroachment of the wolf on our own property and when livestock, pets and ourselves are threatened on public lands. We have more options afforded to us as citizens in protecting ourselves and our property from a threatening human being than we do with a wolf. This makes no since at all.

I believe that segments of our population should not have to bear the burden of this experimental program. The wolf was introduced at a time when our Mule and White tail deer populations were on the decline and it has not been satisfactorily determined what long-term effect it will have on elk populations. The introduction of the wolf certainly has not helped the problem for those of us that hunt. I believe that livestock producers have been treated unfairly in the rules that have been established for the way in which they can protect their stock and the way they are compensated for some of their losses. The rule of "three strikes and you are out" makes no since at all. It only perpetuates the problem of the nuisance wolf. The proposal for carcass management is a task that would

be impossible to accomplish. Who ever came up with this idea has never walked or ridden the mountains of New Mexico. The vastness and terrain of the area the livestock producer would have to cover daily to make sure that a carcass was taken care of in a timely manner makes this requirement impossible to meet. Someone must think that it is just a matter of driving the 'ol backhoe out, dig a trench, push the carcass in, and cover it up. I would gladly like to see them wander the forest with their pick and shovel and take care of the carcasses, which the wolves would promptly dig up. (This ability has been recorded through out the history of the west when the Mountain Man tried to protect his cache of supplies and furs from wolves.) Redefining the status of wolves that scavenge on the carcasses of livestock that died of non-wolf causes could not be determined without a full necropsy and bodily fluid testing of the carcass. How many additional employees and labs would have to be hired and established to investigate and determine the cause of death within a reasonable period of time? Who picks up the bill for this? The taxpayer who is already carrying the burden of this ill-conceived program? When is the Fish and Wildlife Department going to admit that the program, as implemented, is a failure and go back to step one and re-design it? Listen to the experts who have real field experience with the Mexican Gray Wolf. Look at the recommendations of Brown and McBride as well as others.

At the least, the rules should be changed to address the safety of human beings; the impact on other species of wildlife; the loss of pets and the impact on only a few segments of our population that have to bear the burden of the program. New Mexico is an economically poor state and programs such as this effect the income producing ability of rural areas within the state. The lose of only a few head of livestock can be a make or break situation economically for some people. The state and local governments should have the ability to draft regulations that best suit their constituents, not someone on the East or West Coast that has no concept of the rural west and is distantly removed from the situation on the ground. The expansion of the wolf recovery area will only increase the contact of these hybridized, habituated wolves with human beings and increase the potential for wolf attacks; possibly resulting in death. We always hear that "there is no evidence that wolves will attack man". These are not true wolves. They are wolf-dog hybrids that exhibit a very different behavior. Who will accept the responsibility for such a tragic occurrence of a human death through one of these encounters?

Sincerely,



Bill Rogers

P.O. Box 2419

Silver City, NM 88062

575-313-2993

[bdrogers@gilanet.com](mailto:bdrogers@gilanet.com)

cc:

Senator Pete Domenici

Senator Jeff Bingaman

Congressman Steve Pearce





United States  
Department of  
Agriculture

Forest  
Service

Gila National Forest  
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Silver City, NM 88061-7863

Internet: [www.fs.fed.us/r3/gila/](http://www.fs.fed.us/r3/gila/)

File Code: 2670-3

Date: December 18, 2007

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

RECEIVED

DEC 21 2007

USFWS-NMESFO

Dear Mr. Millsap:

This letter is a response to scoping for the proposed rulemaking regarding intent to prepare an environmental impact statement (EIS) and proposed amendment of the rule establishing a non-essential experimental population (NEP) of the Arizona and New Mexico Population of the Mexican Gray Wolf. These comments are offered pursuant to Federal Register 72:151 (August 7, 2007) and recent scoping meetings requesting suggestions for a Proposed Action.

Please keep this office on the mailing list for future information and comment opportunities for the EIS. Please also send this office a copy of the socioeconomic report referenced in item #9 of the pre-decisional steps (Federal Register page 44069). You may send these to the attention of Art Telles, Forest Wildlife Biologist.

**1. General recommendations.** These apply to development of the proposed action and EIS:

- a. Proactively engage in public outreach, objective environmental education, and in finding common ground with rural residents. A balanced education program discussing varied sentiments -- along with actions individuals can take to reduce wolf conflict potential -- could involve local communities, schools, interest groups and universities.
- b. Follow the path begun by Congressman Stevan Pearce by demonstrating not only a desire to listen, but also to work together in finding mutually-agreeable solutions. Coordinate closely with user groups such as the livestock and recreation industries at regional, state and local levels in formulating issues and alternatives. Comments received by the Gila National Forest regarding Mexican Gray Wolf have included public safety and effects to livestock grazing permittees.
- c. Consider financial incentive programs on a broader scale. Examples of successes in other agencies include the Conservation Reserve Program where farmers are paid to take lands out of commercial production during a contract period (e.g., 10 years) and the Environmental Quality Incentives Program (EQIP) which is a cost-share for land improvements and includes a component for federal lands within Arizona and New Mexico. Both of these are USDA-funded incentive programs.
- d. Prior to developing alternatives, a clearly-defined and measurable Desired Condition should be established, the Existing Condition described using the same criteria, and the gap identified, along with an explanation of how the current EIS fails to meet that gap. With this information, respondents could more productively provide suggestions for the upcoming Proposed Action, alternatives and EIS analysis.



2. **Alternatives.** The Gila National Forest supports expansion (revision) of the recovery area as a means of achieving downlisting when local issues and political conflicts are also considered. Expansion boundaries would be a subset of the historic range composed of suitable public (Forest Service, BLM, State) lands; cooperating Tribal areas and cooperating large private holdings could also be included. Considerations to minimize conflicts include habitat quality, native prey abundance, human population densities, and socioeconomic issues.

The Federal Register states the intent to consider reasonable alternatives. The Gila National Forest lies within New Mexico counties with a broad range of interests. The “Listening Session” held by Congressman Pearce last summer initiated a search for common ground. The Gila National Forest recommends analysis of the following alternatives:

- a) No wolf recovery program (comparison alternative, especially for socioeconomic effects).
- b) No change from the current NEP program.
- c) Expansion of the NEP area to include select areas based on criteria including topography, vegetation, population, landownership, land uses, and connectivity to the current NEP area. Focus on public lands (e.g., Forest Service, BLM, State), cooperating Tribal areas, and cooperating large private holdings. Include the White Sands Missile Range.
- d) Expansion of the NEP area to include all appropriate portions Arizona and New Mexico, as well as Colorado and Utah within the Mexican Gray Wolf historic range if these states are agreeable. (“Appropriate portions” include consideration of physical, biological and cultural/political conditions.)

3. **Issues re: Scope of the NEP.** While the topics identified in the Federal Register have been of public interest, it is not clear how these were derived as “issues”. For example, an EIS might not be needed to clarify definitions (issue f), and the role of White Sands Missile Range (issue c) could be woven into alternatives if the needs or advantages to Desired Condition were identified.

a. Treatment of wolves establishing home ranges outside the Blue Range Wolf Recovery Area (BRWRA).

- i. Agree that this is an issue. This issue may drive alternatives.
- ii. The Gila National Forest is within the BRWRA and so is not directly affected by this. However, indirect effects could include reduced wolf conflicts with livestock permittees and recreationists within the BRWRA. Please include the proposal that these wolves be permitted to establish home ranges outside the BRWRA at the discretion of Fish and Wildlife Service (USFWS) unless a problem is identified (e.g., on private land and owner requests removal; resource conflicts). This would involve coordination with federal and state agencies.
- iii. Encourage private landowners to develop agreements with USFWS (similar to a State program allowing wildland fire use on private lands).

b. Initial wolf releases from captivity allowed only in the primary recovery zone BRWRA.

- i. Agree that this is an issue. This issue may drive alternatives.

- ii. Please include the alternative that initial wolf releases are permitted anywhere within the [revised] recovery area, with consideration of local issues.
- c. White Sands Missile Range recovery role.
- i) Not certain that this is an “issue” that may drive alternatives. It could be a resolution of some issues identified through alternative development.
  - ii) Please include this area within the expanded and revised recovery area in the proposed action.
- d. Provisions for private individuals to “harass” wolves engaged in nuisance behavior, involved in livestock depredation, or attacking pets on private, public or Tribal lands.
- i) Agree that this is an issue, but may not drive alternatives. Please address this issue in all alternatives.
  - ii) Please allow private individuals to have limited authority to harass wolves in a manner that is potentially injurious but nonfatal on public land when the wolves are engaged in nuisance behavior or depredation of any domestic animals.
  - iii) Continue allowing harassment or take in self defense or in defense of the lives of others.
  - iv) To help avoid acclimation to humans, encourage non-injurious harassment of wolves on public land when wolves are in contact with humans.
- e. Allowing “take” of wolves in the act of attacking domestic dogs on private or Tribal Trust lands.
- i) This might not be an issue that drives alternatives if it is addressed in all alternatives.
  - ii) Private individuals should be granted authority to harass and if necessary take wolves in the act of chasing or attacking any domestic animals (livestock, pets, other domestic animals), with lethal take allowed without permit on private or Tribal lands.
  - iii) Continue the “unavoidable and unintentional take” provisions.
  - iv) As populations of both wolves and humans expand in southwestern New Mexico, the potential for conflict increases. A sense of control and empowerment could increase support for the wolf program in areas currently less supportive.
- f. Clarify definitions and identify other possible impediments to establishing wolves, such as livestock carcass management.
- i) Definitions might not be an issue requiring an EIS or driving alternative development. Other possible impediments and their solutions may be issues driving alternatives.
  - ii) “Injurious harassment” or “potentially-injurious harassment” needs a definition; see item 3(d) above.
  - iii) The following are **not supported as requirements** of Forest Service livestock grazing permittees.
    1. Remove or destroy livestock carcasses unless identified by FWS as necessary in specific cases.
    2. Utilize only confined calving strategies.
    3. Change from year round calving to limited seasonal calving.
    4. Change from year round grazing on public lands to seasonal grazing.

5. Reduce permitted livestock numbers solely to benefit wolf recovery efforts.

Rather, case-by-case assessment, encouragement to make changes where opportunities exist, and emphasis on voluntary incentive programs from USFWS would be acceptable in a Proposed Action. Permitted numbers would continue to be determined through environmental analysis and permit administration.

- iv) Another impediment to wolf recovery is the social and economic impacts on livestock grazing permittees. Coordination with Forest Service personnel regarding livestock depredation rates and prey base is recommended. Analysis of the economic impact to rural residents, communities and local governments – including recreationists, livestock grazing permittees, and counties – is recommended.
- v) When wolf translocation is needed, then a review process including criteria on local issues and documentation of rationale is recommended to minimize repeat problems. Introducing problem wolves from other areas into an area with current wolf issues and political sensitivities does not best serve the wolf as a recovery species.
- vi) A reduction in the threshold for reimbursement of livestock losses – rather than requiring strict “proof” of the wolf is recommended. A review and change of the threshold for removal of depredating wolves is also recommended. Note that average calf crops are one basis for reimbursement, but can be affected by Trichonomiasis without a vaccination program, by other livestock venereal disease, or from other causes. A required check for Trichonomiasis in the herd prior to compensation may be needed.
- vii) To gain support of more rural residents and ranchers, develop a financial voluntary incentive system to mitigate economic impacts to private individuals and communities within the recovery area. Payments could be made to those already using desired practices or to those converting. Incentive examples include:
  - Reduce the threshold for confirmed wolf depredation.
  - Encourage compatible animal husbandry practices (confined calving, seasonal calving) through incentive payments or reimbursement for expenses to convert management.
  - Encourage regular livestock permittee monitoring to find and treat carcasses (when necessary) and prevent depredation by reimbursement of added expenses of increased intensity of management.
  - Develop incentive for Counties to replace lost revenue (e.g., counties demonstrate reduced revenue, link to wolf recovery program, and lack of replacement through other means).
  - Consider incentive program for ranchers based on the number of wolves using the allotment.

**4. Issues related to evaluation of the environmental impact**

c. Impacts on human health and safety.

- Refer to Items 3-a, b, d, e and f above

- f. Impacts to other species of wildlife, including other endangered or threatened species.
  - This needs to be explored in detail for all alternatives, and may be especially important where expansion of the range is suggested, including whether there is potential for undesirable interbreeding with other canids.
- g. Any other potential or socioeconomic effects:
  - Refer to above Item 1-a, b and c; Item 2; Item 3-a,b,d,e and f above.
- h. Any potential conflicts with other Federal, State, local, or Tribal environmental laws or requirements.
  - Unresolvable conflicts with livestock grazing, recreation, and other authorized uses of National Forest System lands may lead to legal or other challenges. A cooperative approach leading to a proposed action meeting the needs of various users is desired and encouraged.

Thank you for your consideration of these comments. If you have questions, feel free to contact Art Telles at (575) 388-8420 or Glenwood District Ranger Pat Morrison at (575) 539-2481.

Sincerely,

  
RICHARD E. MARKLEY  
Forest Supervisor

cc: Don G DeLorenzo, Art Telles, Pat Morrison

OKAY WELF NEPA SCOPING 10/11

I am writing to urge the U.S. Fish and Wildlife Service to do everything to ensure the recovery of the Mexican gray wolf as the operators that have been a national failure.

The current protocol of predator control is not working and needs to be suspended.

It is imperative that non-wolf-killed horses, cattle, and sheep carcasses be quickly removed from all grazing leases to prevent scavenging and habituation to livestock.

The overgrazing on federal lands by leases needs to be stopped which result to many livestock deaths. It may be necessary for the BLM and Forest Service to suspend all grazing in the areas of the wolf recovery program and to expand the size of the recovery areas.

Various compensation will pay for livestock killed; we will need to be killed or trapped.

The recommendations of the 2011 scientific review of the reintroduction program needs to be enacted.

Various law enforcement of illegal wolf baiting and baiting killing needs to be pursued especially in Catron County, New Mexico. Civically prosecuted cases will discontinue the practice.

Your cooperation is greatly appreciated.

Respectfully

David M. Rose

DAVID M. ROSE

1309 WEST ST

SILVER CITY, NM 88661-4637

**RONALD L HENDERSON**  
**2414 Kris Circle**  
**Silver City, New Mexico 88061**

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DEC 27 2007

USFWS-NMESFO

December 27, 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:

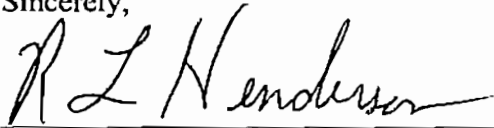
Thank you for the opportunity to comment on the above mentioned proposal. As an active hunting sportsman, I am directly affected by the nonessential experimental Mexican wolf reintroduction program. It is my desire that my concerns be addressed in the environmental documents needed for compliance with the National Environmental Policy Act. My comments are as follows:

1. The present status of the program (i.e. Nonessential experimental ) should remain as is. More restrictive designations will not aid in the recovery program and additional restrictions only limit the management options 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 lose 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.
6. The artificial boundaries established when the program first began should be scrapped and the wolves should be allowed to roam free within the states of Arizona and New Mexico.

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

Sincerely,

A handwritten signature in cursive script that reads "Ronald L. Henderson". The signature is written in black ink and is positioned above a horizontal line.

Ronald L. Henderson  
Sportsman



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DEC 27 2007

Mexican Gray Wolf  
Comments for Scoping Period, fall 2007  
December 27, 2007

USFWS-NMESFO

On my arrival home from a three week visit to Spain I am dismayed to learn that the wolf count is now down to 21. This number does not include puppies, as they are too vulnerable to be counted until the end of december, less than a week from now. I can not imagine many puppies have survived as the toll from removal on puppies and their parents has been extreme in the last year. The Aspen Pack was decimated while I was away. How can it be that the US Fish and Wildlife Service, the agency ultimately responsible for carrying out the law, The Endangered Species Act, can let this relentless and reckless removal go on? By the time this long scoping session is finished and the results tabulated, decisions are made determining actual changes in the program, and then implementation of the changes, there will be so few wolves left on the ground that the program will have to begin anew. (Perhaps that is the situation right now.) The political environment that needs to emerge to change the final rule will take a long time, another two years? We have watched the program wind down since 2001, when many of the changes now being considered were put forth by the scientists writing the Three Year Review. The Five Year Review made 37 recommendations, some of those would have called for a change in the final rule. And so those changes were not made. It is very difficult to believe at this point in time, when reading over the Mexican Wolf Recovery Program Chronology on the U.S. Fish and Wildlife web site, that there has been a serious effort to bring back our top predator to New Mexico and Arizona, regardless of all the money and work thrown at *Canis lupus baileyi* on the part of federal and state agencies. The U.S. Fish and Wildlife Chronology ends with the completion of the five year review in 2005. Perhaps those chronicling the downward spiral of wolf recovery could not bear to go on to finish it. It is clearly transparent what has happened here. We are at the brink of the second near extinction of our local wolf, only because state and federal agencies listen to the rhetoric of a small group of fear mongering fanatics that despise them and the reality of public lands to boot!

The following are the changes that were called for long ago. Here they are once again:

1. First and foremost there should be an immediate moratorium on lethal and non lethal removal of wolves until this entire procedure of scoping and decision making is finished, no matter how many years it takes. It is a critical moment, an emergency situation at this point. SOP 13 should be discarded. This moratorium should have been put in place at the beginning of the scoping session if not a year before. If this does not occur immediately there will be no wolves to continue the program and the rest of the recommendations are moot.

2. With numbers so low, it looks like many more wolves will have to be introduced to the wild if the program is to continue. There should be direct release of captive bred wolves into New Mexico.

3. The boundaries limiting the movement of wolves to the Gila and Apache Forests should be erased. The wolves should be free to travel without restriction.

4. The Final Rule should be modified such that the Mexican Gray Wolf population is not considered Experimental or Nonessential. This Mexican Gray Wolf population in New Mexico and Arizona is the only wild population in the U.S. and should not be treated casually, as if it were expendable. *Canis lupus baileyi* should have the full complement of protections granted by the Endangered Species Act where ever it may roam.

5. The Forest Service and the BLM must create a permit system for the ranching industry that requires full cooperation with, and acceptance of, the wolf recovery program as part of the privilege of participating in the permitting process and grazing their stock. Public Lands are multi use and ranching is not more important than the protection and enhancement of endangered species populations. Full compliance with these permitting regulations should be carefully monitored and ranchers not in full compliance must be required to remove their stock. These regulations will require animal husbandry practices that actively protect cattle AS WELL AS WOLVES.

5. If AMOC is to remain in place then it should be modified to include biologists and ecologists that have an equal voice to all others combined, in decision making. The aim of AMOC should be the Recovery of the Mexican Gray Wolf, not the resistance to its recovery. AMOC's job is not placating ranchers. If ranchers don't like wolves eating their cattle, and they are not satisfied with the compensation they are getting from Defenders of Wildlife then let them be cowboys and cowgirls that manage their animals; practice animal husbandry as their profession calls for it. If that is out of the question, which it seems to be, then they need to accept the losses due to wolves as part of the price inherent in their already subsidized public lands grazing, or find a more lucrative profession elsewhere. AMOC should be busy making sure wolves do not die. Not killing them.

6. The Recovery Team should be reconvened ASAP with biologists, ecologists, conservationists and environmentalists the main component of its membership. The establishment of the number of wolves that constitute recovery and delisting should be the top priority. The number of wolves that constitutes recovery should be scientifically realistic for the survival of the species relative to the habitat available. Not what one special interest group would prefer. The Recovery Team should have as its goal the RECOVERY of the Mexican Gray Wolf, sometimes called the Desert Wolf, not the resistance to it's recovery.

I hope this Public Comment Period was a serious attempt to document the public's desire for constructive change in order to have a successful Mexican Wolf Recovery program. I have written, requested, and spoken of the need to make these changes many other times, as countless others have as well, to no avail what so ever. Please begin to turn this unlawful and despicable circumstance around with a quick removal order of SOP 13.

Thank you in advance, for FINALLY doing the right thing forward, toward a thriving Mexican Wolf Population in the near future.

Rinda Metz  
Grant County  
Back Country Llamas

Mailing address:  
21 Wind Canyon  
Silver City, New Mexico 88061

2134 Cottage San Rd.  
Silver City, NM 88061  
December 27, 2007

RECEIVED  
DEC 27 2007  
USFWS-NMESFO

Mr. John Slown  
New Mexico Ecological Services Field Office  
2105 Osuna NE  
Albuquerque, NM 87113

Dear Mr. Slown,

Just a note to say that I strongly support the Wolf Recovery Program!!

Sincerely,

*Virginia Robertson*

Virginia Robertson

December 29, 2007

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

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JAN 01 2007

USFWS-NMESFO

Dear Brian,

Enclosed are three reports of my surveys of the wolf recovery areas conducted more than two years ago indicating there is not sufficient food to support anywhere near the number of envisioned wolf packs. If the goal is a hundred animals the only way to do so is to remove arbitrary boundaries allowing wolves to roam to follow their primary prey species. If not the program should be suspended in the Gila National Forest or reduce the number of packs to a number consistent with the carrying capacity of the designated area.

Respectfully,



Albert S. Burney

# THE TAP TO ACORN

ALBERT BURNEY 665 TYRONE ROAD BMH 204 SILVER CITY, NEW MEXICO 88061-9112

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*New Mexico The Land of Enchantment*

August 25, 2005

Michael Robinson  
Center for Biological Diversity  
Post Office Box 53166  
Pinos Altos, New Mexico 88063

Dear Michael Robinson;

Goal: Identify an ecological balanced food chain capable of supporting a wolf pack and search for evidence Indians inhabited the region in the distant past.

Last Tuesday I drove to the Snow Lake campground, parked my van, shelled out five bucks and listened for the howls of either wolf or coyote. No howling possibly drowned out by the hum of portable generators. The following morning I drove 4.2 miles east to Loco Mountain [ FS 705 trailhead ] where either U.S. Fish & Game and/or the Forest Service maintain a travel trailer, a modern sweet smelling outhouse, bear resistant garbage cans and a sign declaring the area is wolf country. Wednesday morning I climbed Loco Mountain scanned the area for wolves, elk as well as cattle. No sign of any large animal. In fact, other than a lone red tailed hawk who circled a couple of times caught a thermal and disappeared over the horizon, there was no sign of life whatsoever, whether morning, noon or dusk. Thursday morning I headed into the wilderness planning on camping at the first water, hopefully Aeroplane Mesa, spend the night and return the next morning. No water so I labored on finally descending into the Middle Fork of the Gila River Gorge some three and one half miles down trail. The trail was rocky and the hike difficult but well worth the extra effort.

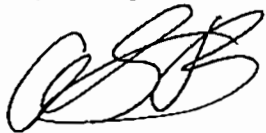
The U.S. Department of Fish and Game's research appears to have consisted only of over flights rather than a comprehensive environmental impact statement required because rancher's financial's as well as wolf's very existence is impacted. Said area is clearly desert evidenced just by noting the absence of elk, deer or cattle. Neither was there small game animals such as rabbits, squirrels, skunks or coati's. Other than in the Gila River Gorge no scavengers except a single vulture maintaining a roost Ravens claimed rights to the gorge but were no where visible in the experimental area assigned to a wolf pack. Probably the most significant absence was ants and lizards which prey on ants Without them there is no food chain. An occasional humming bird enjoyed a supportive food chain enjoying gnat sized insects and thistle nectar. For the wolf pack this territory is a lava field/desert even more unfriendly than the habitat in the heart of the Mojave Desert. Vegetation is grassland only goats find palatable and juniper trees having a density of no more than one tree per acre testify about the desiccated quality of the mesa. The carrying capacity of mammals is zero despite the appearance from afar it could be suitable wolf habitat.

Apparent is that both sides, ranchers and U.S. Department of Fish and Game, are so committed to combat that the wolf has become irrelevant. The Dept. of Fish & Game is faulted for instituting and continuing an experiment without conducting basic research and the rancher for being so unalterably opposed to the introduction of the wolf he isn't open to genuine dialog. Both parties demonstrate an absolute unwillingness to compromise that, if breeched, would end the persecution of the wolf in the Gila Wilderness. The ranchers are a victim of their own intransigence as had they surveyed the wolf habitat they would have discovered a habitat totally unsuited to support even a single wolf pack. The execution of wolves by Fish & Game is an admission of failure even though field staff implemented every suggested remedy save the shock collar the outcome of which would be the same only sooner. Without termination or major modification this experiment leaves the wolf with but two options - eat beef or starve.

This particular survey is only a snap shot that will be followed by at least three more at four mile intervals as weather and finances permit. I am a single retired private citizen/chemist dedicated to the preservation of the wolf. Because my focus is the health and well being of all wolves in the Gila Wilderness they should be relocated to a suitable habitat free of livestock and commercial enterprise. That position, I am confident, is rancher's preference.

According to the enclosed article from the Silver City Sun News Rocky Mountain National Park park officials may want wolves to control chronic wasting disease. Therefore recapture the wolves still out there and ship them to Colorado before any more are executed. Local ranchers and interested parties can contact wildlife veterinarian Margaret Wild or L. David Mech, a University of Minnesota wolf expert, to verify my observations because Fish & Game should know as well as the ranchers that, even with a suitable food chain, wolves and cattle cannot coexist. For proof one only need observe the well fed domestic cat's preference for birds rather than cat food to know that instinct trumps man's best effort despite intense training to behave otherwise.

Respectfully

A handwritten signature in black ink, appearing to be 'ASB', written in a cursive style.

Albert S. Burney

# THE TAP TO ACORN

ALBERT BURNEY 665 TYRONE ROAD BMH 204 SILVER CITY, NEW MEXICO 88061-9112

---

*New Mexico The Land of Enchantment*

August 1, 2005

Michael Robinson  
Center for Biological Diversity  
Post Office Box 53166  
Pino Altas, New Mexico 88063

Dear Michael Robinson;

Wolves and dogs are the before and after phases of the current misdirected program deployed against the wolf. Nothing is wrong with the dog other than the fact it is designed to be a pet or a guard not an animal with a well defined mission.

Ostensibly wolves are being reintroduced to improve the health and vitality of the various wild herds but by executing wolves demonstrating typical wolf behavior we will have repeated the process completed some ten thousand years ago of converting a wild wolf into the family pet. According to many who should know, the predator is destined to disappear from the surface of the earth because predator and prey cannot coexist. The reintroduction program as now constituted will eventually attenuate the predatory instinct, by selective breeding, if the wolf doesn't learn that preying on cattle is taboo. The technology is available now to teach the wolf that very important and fundamental fact. All we need do is act responsibly.

The fundamental travesty in the wolf reintroduction of wolves program into the Gila National Forest is the fact the original designers and managers, men and women of noble intent, have been replaced by political hacks appointed to positions of authority who don't have the interest of wildlife at the core of their concerns. Some may argue but shifting the reintroduction program to the responsibility of the inept public official is reason enough to believe the administration wishes to de-emphasize if not kill the program outright.

## COMMENTS.

Only animals severely harassed by motorized vehicles will flee until they drop dead from exhaustion. No helicopter or plane could cause that. Brunhilda surely died as a result of hot rock cowboys pursuing her on ATV's or trail bikes until she could run no more. Why not employ pit traps, portable corrals or nets allowing the animal to be tranquilized before being examined or batteries replaced in its collar.

Battery life of transmitters may be so limited it requires capture more often than necessary particularly if a five year battery is available. More sophisticated but equally effective are implantable devices similar to pace makers whose signal could be detected at greater distances with increased selectivity and sensitivity benefiting from state of the art battery

technology. Might overstressed wolves be prevented by pursuing only on horse back regardless of the area or terrain? In a fair world if any animal, domestic or wild, were harassed the way Brunhilda was, that person would face a judge charged with cruelty. All I hear is a barely audible oops!

Are wolves responsible for all the predation many assign to them. Mountain lions inhabit the areas as well proven by Quentin Hulce, a hunting guide, who organized expeditions specifically to hunt mountain lions in the Snow Lake area. Feral dogs could also play a role. I have shot feral dogs in the Truchas area, Tesuque and a mile north of the prison in Santa Fe so I am certain they exist throughout New Mexico. However no sign of feral dogs in Southern New Mexico. A characteristic I found encouraging is shooting one member of the pack rids that area of entire the pack. Feral dogs offer an as yet unrecognized danger to wolves in that they may interbreed therefore breeding the wolf right out of existence in a few years.

When it comes right down to deciding how to preserve wolves I don't see a solution to maintaining the current genetic profile without continual intervention by the Fish & Wildlife Service unless cattle are removed from grazing lands. Maybe in fifty years when the beef is produced by large corporations on immense feed lots, therefore sending the small rancher into retirement, that the wolf will return to its place in the history of the West. Under present circumstances the wolf pack must be managed into the foreseeable future to insure it's survival.

Respectfully

A handwritten signature in black ink, appearing to read 'ASB', written in a cursive, stylized script.

Albert S. Burney



September 26, 2005

Michael Robinson  
Center for Biological Diversity  
Post Office Box 53166  
Pinos Altos, New Mexico 88063

Dear Michael Robinson;

After viewing the photo of the wolf being crated for release dread swept over me for the wolf's safety and well being. How could any supposedly well intentioned smart wildlife specialist even entertain the thought that the pictured wolf or any wolf for that matter wouldn't flee the scene after being systematically terrorized then released into a habitat teeming with people and domestic livestock? It couldn't do anything else! Coupled with the roaming restriction it is institutional premeditated brutality where the administrators should face a jury charged with cruelty beyond the wolf's capacity to endure.

How should Fish & Wildlife correct the injustice inflicted on the wolf? Suspend the experiment permanently or at least until the entire staff is replaced with wildlife specialists demonstrating at least a trace of compassion for the wolf persecuted from the time cattle first displaced it from its historically established territory. But first consider nature's example in Alaska where wolves follow the caribou herds as they migrate culling the sick and the old as well as the western plains [ both past and present ] where wolves fed/feed themselves by stampeding the herds of buffalo picking off stragglers. Now Fish & Wildlife presumes to defy nature by confining wolves to a specific area [ without a second reliable food base ] while elk migrate from place to place in search of suitable vegetation. It isn't in the wolf's genetic programming to be constrained.

Suspension should be postponed, however, until ranchers are consulted and their cooperation solicited to provide wolves with food during those months where the danger of starvation is the greatest. Leave cattle carcasses where they fall to be claimed by indigenous wildlife. Fish & Wildlife should then ask ranchers to harvest elk and locate carcasses in wolf territory until such time it develops a taste for elk meat. The only hitch being finding enough elk to support a wolf pack. Apparently they evacuate normal feeding grounds during periods of high human activity.

East and immediately adjacent to the Slash Ranch small prey as well as elk are absent not because of inadequate grass but because cattle displace both from their natural habitat confirmed by sighting only one elk and no small mammals during a second survey. Wolves must still eat beef or starve.

Significant is the retirement of the *wolf country* sign and leaving the travel trailer headquarters unoccupied allowing one to hope the experiment may have ended. Since the trailer was unlocked I entered, tossed rotting hamburger and rescued the enclosed map. Thereafter I settled-in for the night [ in my van ] when at 3.50 AM I was awakened by howling north of the area where cattle grazed the previous day. Except for pitch that howl was more wolf than coyote offering hope a wolf might be establishing a territory. However the food base remains critical so the original conclusion stands until evidence to the contrary requires a change of mind.

Because Brunhilda sought refuge near the Negrito Fire Base I surveyed that location as well to determine if it would support a wolf pack. Except for a group campsite it is, indeed, potential wolf habitat - no evidence of continual or even intermittent human usage - no fire rings, no firewood gathering and only a few foot trails. Obviously Brunhilda liked what she saw so closing the group camp site could provide the wolf with a chance for survival in New Mexico. After inspecting that site I evaluated surrounding areas finding many definitely superior to the Gila Wilderness location. Still no elk however

Of equal gravity is the human presence throughout the sector where ranchers and employees present only a minor distraction. During weekends and holidays when campers swarm-in the human presence becomes pervasive and oppressive. Come August the state issues elk tags to bow hunters who flood the territory trying to bag a trophy elk from their ATV. Following bow season comes rifle season when the state again issues permits to hunt elk where the human presence is orders of magnitude greater than bow season. Such a situation is wall- to-wall people for yours truly as well as the wolf, I am sure. The only alternatives require closure or discontinuing elk permits until the wolf establishes its own territory elsewhere. One can be assured either action would raise a howl heard all the way to Washington. The state, for certain, would object because closure impacts income in addition to being a violation of state's rights.

What comes after suspension should be a demand for Fish & Wildlife to explain why it deposited the wolf in an area containing the greatest concentration of cattle and humans in the region. Whoever authored the experiment may be mesmerized by the wilderness concept believing, erroneously, wilderness is wolf friendly because conflict between humans and wolves is minimal. However wilderness designation lures a different but usually larger numbers of campers, the difference being the intent of the individual but, due to the ubiquitous camp fire, the environmental impact is essentially the same or worse.

Respectfully,

A handwritten signature in black ink, appearing to read 'ASB', written in a cursive, somewhat stylized script.

Albert S. Burney

Dec 29, 2007

Comments:

Dear USFWS People,

Please find some way to prevail Against the Atror country NUT cases who think the wolves are going to eat their children. The American public wants wolves, we must not let the democratic process be subverted! It is your responsibility to carry out this mandate.

Sincerely,



Name: VAN Clothier  
Street: Box 2721  
Silver City  
City, State, Zip: NM 88062

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

DO NOT STAPLE  
Thank you for your input!

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.

December 30, 2007

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

Fax: (505) 346-2542

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

Dear Mr. Milsap:

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

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

1. Disclosure of the full social, cultural and economic impacts on rural residents and local governments to include the loss of tax revenue and increased government operation costs due to presence of introduced wolves. Appropriately recognize and mitigate impacts to pastoral communities and individuals affected by introduced wolves.
2. Full investigation into the efficacy of livestock carcass removal including the increased cost to livestock operations.
3. Discontinuance of the practice of translocating problem wolves.
4. Prompt control, lethal and non-lethal, of problem wolves.
5. Improve monitoring of wolves to insure that residents of the release areas are informed when wolves are in close proximity and to facilitate documentation of predation on livestock.
6. No claims of uncollared wolves allowed in relations to sightings or depredation. All wolves must be collared and tracked before dispersing as a puppy. If an uncollared wolf is sighted or involved in an attack or kill that wolf shall be tracked, trapped and collared. This wolf is subject to all the rules.
7. Amending the 10(J) rule to include the authority to harass Mexican wolves for purposes of scaring them away from people, buildings, facilities, pets and livestock. Specific language is needed to state a person may kill or injure a wolf if threatened by a wolf or in defense of another who is threatened, and may, kill a wolf that is not responding to harassment and is consistently in populated areas frequented by people and demonstrates desensitization to human encounters.
8. Amending the 10(J) rule to allow harassing or humanely dispatching of wolves by federal, Tribal or state agencies when wolves exhibit fearless behavior or become habituated to humans and pose a demonstrable threat to human safety. This provision should include providing a federal take permit for local county law enforcement personnel to allow them to lethally take a wolf for immediate protection of human safety.
9. Amending of the 10(J) rule to allow serious and affective methods that will immediately stop wolf attacks on dogs and stop wolves from coming into private property and areas where people live. This should include public education practices that teach people how to deal with habituated wolves and give them the tools to do it. Also necessary is the need to issue take permits to those who are suffering these types of territorial challenges by Mexican wolves at their homes.
10. The 10(J) rule should document that people reside in current and potential wolf habitat. The general public has been given the mistaken impression that people do not reside in the wolf release and recovery areas.
11. Maintenance of the livestock production in the release and recovery area.
12. The effects of wolves on watersheds, spread of disease and domestic and wild animal populations.
13. An allowance in the rule for livestock owners or their agents may take (including kill or injure) any wolf engaged in the act of killing wounding or biting livestock on federally administered lands (see definition change) allotted for grazing anywhere within the Mexican wolf Experimental population area, including within the designated wolf recovery areas.

14. The need for definition changes in the new rule and management plans as well as any SOPs, such as:  
**BREEDING PAIR:** an adult male and an adult female that are firmly mated and have the potential to breed and raise a litter of pups in the upcoming breeding season

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

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

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

**ENGAGED IN THE ACT OF KILLING, WOUNDING OR BITING LIVESTOCK:** to be engaged in the act of grasping, biting, attacking, chasing, harassing (howling near paddocks with intent to scare), 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, poultry, burros, llamas, chickens, stock dogs, guard dogs, hunting dogs and other domestic animal (including pets) to which value is attached and the loss of which would prove to be a financial or emotional hardship and result in the takings of private property (pursuant to the Fifth Amendment of the U.S. Constitution).

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

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

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

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

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

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

16. 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.

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

18. 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.

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

20. Flight reports where any wolves are tracked shall be posted immediately on the FWS or other IFT public accessible website with real GPS coordinates to assure public safety.

21. Wolves in and around communities and homes reported no more than 3 times shall have a IFT member there for 24 hours to trap, collar and remove all wolves and as determined by behavior all wolves shall be moved to the center of the wilderness or if this is a 2<sup>nd</sup> time to be removed, the wolf pack shall be placed in captivity.

22. Hazing by IFT shall not be used if it will send the wolves from one home to another. Wolves shall be removed from communities and moved to the center of the wilderness or if this is a 2<sup>nd</sup> time to be removed, the wolf pack shall be placed in captivity never to be re-released.

23. Livestock owners or agents shall have the right to harass and or kill wolves in the act of harassing or scaring livestock. This includes hanging around, howling near camps and chasing.

24. A livestock owner or agent shall have the rights to continue to pursue a wolf that is in pursuit of their livestock whether on private or public lands.

25. Interactions with wolves where children are involved such as being encircled or a wolf attacking near a child (100 yards) or coming near a school yard shall cause immediate trapping and removal of all wolves

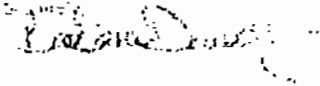
related in the incident or captured nearby where the incident occurred and removed from to a holding facility and not be available for re-released ever.

26. All wolves shall be vaccinated for rabies and other related transmittable diseases every year or as specified by the vaccine manufacture.

27. Only the classic wolf kill and wolf bite wounds shall be all that is necessary to prove a wolf attack or kill.

28. A missing livestock animal such as a calf or colt and horse or cow hair later found in wolf scat shall be used as 100% confirmation that this wolf or wolves were involved in killing a livestock animal.

29. Campers and hikers need to be notified if wolves are being fed in an area within 3 miles of where they are camping and hiking or if a wolf incident or sighting occurred within an area within 3 miles of where they are camping or hiking. This information should be available similar to wildfire information from the Forest Service.



Tamara A. Ogilvie  
10199 Hwy 180 West  
Silver City, New Mexico 88061

December 31, 2007

Mr. 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](mailto:R2FWE_AL@fws.gov)

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

Dear Brian Milsap,

As a livestock producer in Grant County, I am writing to you to express my concern that the Mexico Wolf program is causing an unbearable burden on livestock producers and other rural residents within the wolf recovery area.

Many producers are experiencing depredation losses are far greater than the confirmed kills found in time to necropsy. Wolves are killing numerous baby calves, leaving no evidence to base a confirmation on until the wolves actually kill a larger animal. No actions are even taken when they have been confirmed to have attacked dogs on deeded land where children are residents. This is a very unacceptable situation. Producers should be able to protect their homes, children, pets and working dogs, and they need reasonable compensation for livestock losses.

County governments are also facing reductions in tax revenues and outfitters are facing reductions in revenue due to decreased hunting opportunities due to this program. Sportsmen are also being impacted by decreasing numbers wildlife. It is unfair that the financial burden of this recovery program has been shifted to the ranching industry and the local, rural residents who can ill afford to continue to suffer losses.

The USFWS continues to follow practices with the wolf recovery program that cause problems for rural residents. Wolves and wolf packs are being fed in some areas which causes the habituation of those animals to human contact. Wolves are allowed more kills here than in other wolf reintroduction areas such as Minnesota in the Midwest. More evidence is also required to confirm a kill here than in other areas.

To date there has been no progress in establishing an acceptable compensation program for producers or other rural residents. Dr. Tuggle, the USFWS Director for Region 2, has indicated interest in such programs but funding, among other things, seems to be an issue.

The Mexico Grey Wolf population is currently designated as a non-essential, experimental population. At some point, the program must be assessed and some determination made about its continuance. Is this population really worth the money and disruption to people's lives at this point? The option of "no wolves" should be able to be considered.

Sincerely,



Tamara A. Ogilvie





RECEIVED

DEC 31 2007

Grant Soil and Water Conservation District  
2610 N. Silver Street – Silver City, NM 88061  
Phone: (505) 388-1416

USFWS-NMESFO

December 31, 2007

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

Subject: Transmittal of Grant Soil & Water Conservation District's Scoping Comments Regarding the Mexican Gray Wolf Environmental Impact Statement and Proposed Rule Change

Dear Sir:

The Grant Soil & Water Conservation District's submits the following scoping comments for the Mexican wolf Environmental Impact Statement (EIS) and proposed changes to the Mexican Wolf Nonessential Experimental Population (NEP) final rule. Our comments are based on several major areas of concern, which include but are not limited to the following:

- Expanding the wolf boundary: Because of all the problems that currently exist with the Mexican wolf program, it would not be wise to expand the problems to other areas, impacting more people; especially given the lack of adequate funding necessary to mitigate the current direct costs and the social costs.
- In terms of direct releases in New Mexico, for the same reasons expressed above no wolves should be directly released into New Mexico until it can be determined what the wolf's biological and human factor carrying capacities and through, more rigorous scientific studies are conducted, especially geared to assessing the long term impacts to New Mexico wildlife.
- When a wolf becomes a problem by frequenting human settlement, displaying habituating behaviors, these "problem" wolves should be immediately and permanently removed.
- Non lethal wolf deterrents, such as hazement, can only be effective if it is aversive (punishment) conditioning according to canine and wolf behavioral specialists. Lethal means should be used when a wolf is determined to be a problem. The current Take permit should be streamlined for human protection as well as reducing livestock depredation. Trapping and relocating wolves to permanent pens removes the problem wolves. But allowing lethal takes should not be encumbered by the red tape that now exists. We encourage the FWS to adopt more liberal take permits like what the FWS allows in other, northern wolf areas. Furthermore, the FWS should examine other ways to remove and relocate wolves to refuges (large acs.) that could use other public lands and provide financial incentives for willing private land owners and parties to raise "problem" wolves in large areas. This would be a good alternative to killing problem wolves or penning them in cages.
- Carcass disposal cannot be feasibly done and it has n scientific or empirical basis for reducing wolf depredation on livestock. Certainly the rancher cannot feasibly remove dead livestock and the agency probably does not have the funds t remove carcasses; it would probably require expensive equipment, if not helicopters to remove carcasses. Furthermore, removing cattle carcasses will actually have the oppose effect – t will result in more livestock depredation by wolves because the wolves would not be eating on the livestock t just killed because it would be removed. So the wolf will end up killing more livestock to make up f the carcasses that are removed.

The Conservation District is a sub-unit of the New Mexico state government with statutory responsibilities for l coordinated planning and management, including wildlife. Grant Soil and Water Conservation District takes seriously its statutory responsibilities to establish and implement programs to protect wildlife. Our Conservation District encourages and has been involved in conserving New Mexico's wildlife heritage, especially those species that are endangered or threatened.

With the introduction of the Non Essential, Experimental Mexican wolf, it is imperative that the U.S. Fish and Wildlife Service (FWS) determine the effects on New Mexico's wildlife from the translocation of wolves from Arizona to New Mexico. We strongly encourage you to work with New Mexico Game and Fish Commission in

analyzing the impacts of wolf introduction on New Mexico's wildlife. In southwest New Mexico, we are trying to stop the declining mule deer population. We have sensitive species, such as the big horn sheep. Working together, along with wildlife specialists and our land grant university at New Mexico State University, we can examine the potential impacts of any more wolves into southwest New Mexico, and the effects on the management of wildlife as well as the economic impacts related to hunting and outfitting/guiding.

The Mexican wolf program has problems in effectively and fairly translocating wolves into New Mexico. It appears that the cattle production has been unduly impacted with the wolf translocation. These negative effects on small family ranches can be devastating. Yet, the FWS socioeconomic impact report does not display the degree and severity of these impacts to the public.

Hence, the Grant Soil and Water Conservation District recommends that that the FWS proposed Rule change addresses the following:

- Determine the wolf impacts on the wildlife of New Mexico's wildlife conservation and sound management the Conservation District
- Determine the impacts on effected communities and livestock production
- Develop effective compensation to cover the full costs of livestock depredation due to wolves
- In the best interest of furtherance of the protection of wolves and people and rural communities, we recommend that any more problems wolves translocated to New Mexico, be placed into areas that eliminate or significantly reduce the human-wolf conflicts.

The Grant Soil and Water Conservation District requests that your agency work with our Conservation District in protecting the and in the management of its habitat. We look forward to hearing from you on this matter.

Respectfully submitted,

*Dusty L. Hunt*

Dusty Hunt, Chairman

Grant Soil & Water Conservation District

RECEIVED

Reference: Mexican Wolf recovery plans

DEC 31 2007

USFWS-NMESFO

Mr. Slown,

I am taking this opportunity to again urge caution in pushing ahead with the Recovery Plan as written. Ideally, I would like to see the whole program cancelled, but we both know that is impossible. It would jeopardize many good programs that are making progress, and politically impossible at this time. So, rather than dwell on all previous mistakes, let's work on a positive solution. Below, I have identified the major problems. I think you will find them factual.

**First, the problem of habituated wolves.** This is the most divisive issue of all, and has caused enormous anger among rural New Mexicans. For the most part, I believe the ranchers and other families that have had their world turned upside down, have shown remarkable restraint and tolerance.

I do not believe the problem of habituated wolves was even given any credence in the original scoping, and the release sites being in wilderness areas was supposed to prevent such problems.

**Domestic animal predation.** This is a fact of life with any predator. However you have given the wolf special standing, even above human predators, and this is intolerable to the rural minority that is most affected.

There was a "carrot" offered towards livestock owners, for a third party to make payments to livestock owners for animals destroyed by wolves. This unusual authorization of payment for predation by Mexican Wolves has been difficult to prove, cumbersome, and usually not the true value. At best, it hasn't enlisted the support for which it was designed.

**Special standing of the wolf.** This situation is the basis of the Fish and Wildlife's acrimonious relationship with so many people. To be blunt, a Mexican Wolf can transgress against any citizen, (man, woman or child) in ways no other animal or person can, without fearing death.

A wolf can kill your pet dog, even on the porch of your house, and you cannot use deadly force to prevent it. Yet, if the wolf is chasing a lamb in your private pasture, miles from home, you can kill it. If you do kill it, you must notify the authorities. However, if the lamb is going to die, better not kill the wolf, because you will be charged with killing a wolf, because it is eating a dying/dead livestock animal, not pursuing it. (The value of the lamb, about \$40, the cost of a grooming at a "Pets R-Us" for Fido.)

However, if you are on a horseback trip, on public or forest land, and a lion, bear or a man is attempting to kill your horse or mule, you can use deadly force to protect your livestock. If it is a wolf, you can not.

It really is "Alice in Wonderland"

**Over harvest of game animals.** This is the ideal situation, wolves eating deer, elk rabbits etc. This is the plan. However, what is to be done when the wolves reach a number that there are not excess animals left for the hunters?

Each year we are seeing fewer and fewer permits for big game, and from an economic standpoint, this does not bode well. While wolves are a part of the equation now, how dominant will they be when there are a hundred or more?

What are the plans to keep viable guide and outfitter industry in southwestern New Mexico? We both know that economic effects must be considered in any changes made with the reintroduction scoping process.

**Solutions.** These are my ideas and opinions.

**Habituated wolves.** This problem can only be fixed with the removal of the individual wolves that exhibit this unnatural habit. Since only a minority of the wolves become habituated, now is the time to remove these unsuitable individuals from the gene pool. They must be either killed or trapped. If trapped, then not allowed to breed. This is Animal Husbandry 101. To ignore this will relegate the Mexican Wolf to be a coddled and protected species for ever.

I believe strongly this is a genetic problem. I have lived my whole life in and around the Gila Wilderness, and have had some unusual close encounters with wild animals. These animals showed a total lack of fear of me, while others in the same herd or group behaved in the normal way, and fled from me. These animals were simply missing the inherent "wildness" that they needed to survive around the predator man. In the past 10,000 years evolutionary pressure has favored those that have a inherited distrust in humans. That is not an acquired characteristic of individuals but the instinct of being wild.

I believe the Mexican Wolf have either been tainted with domestic dog genetic material, and/or have been exempt from evolutionary pressure so long, due to captive breeding, that many are born without the instincts to avoid humans. Since as you told me there is only 1% difference genetically between some dogs and wolves, there is no way you can prove that there is no dog cross breeding in the Mexican Wolf.

**Domestic animal predation.** I do not see an easy solution here, because wolves will kill what they can, when they can. It is up to you to take the moral high ground, and pay for any and all personal animals that are destroyed by wolves. This includes all animals, from house cats on up. Also, you need to pay fairly, promptly, and cover all the costs incurred by the owner.

Three strikes and then removal should be continued, but I think it is just going to perpetuate the problems. The three strike rule needs flexibility, either up or down due to circumstances. Understand, you are working with lots of different animals and conditions, and a good field worker should have the ability and discretion to make the call. For instance, give some slack to older animals that have a good track record and move fast on those that are habituated.

**Special standing of the wolf.** This solution is easy, and has lots of political advantages. When it comes to any domestic animal or livestock, it is simply up to the owner as to how they protect their property. If, for instances, a wolf killed one of my chickens, I wouldn't kill it because it is not that big a deal. However, more important and expensive animals would be much more vigorously protected. I am suggesting the wolf is entitled to the same protection as bears and mountain lions concerning predation, but no more.

The right to protect ones self and property cannot be infringed on, regardless as to where the transgression occurs. Your audacity to dictate that a persons' civil rights are abridged on public lands begs civil disobedience.

Perhaps I need to be more blunt on this: You anger people enough, they will react and try to get back at you. I am willing to bet that the wolves that were shot were killed by someone that was really angry with you, not the wolf!

This change in posture would probably result in slightly greater loss of wolf numbers. The losses would be mostly in habituated animals, because they are the ones most likely be caught in the act. Thus it could be a way to improve the genetic quality and solve the problem of habituated wolves.

At no time should a person kill a wolf in a chance encounter. This includes those that happen do travel close to human habitation or livestock.

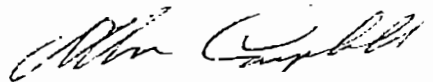
Over harvest of game:

Our elk and deer herds are at a very low level now, and the number of permits are already dropping. I believe the drop in ungulate numbers are a combination of all the predators, but wolfs are Johnny-come lately. I believe the wolves will cause the deer and elk herds to drop precipitously before the target of 100 is reached. This could cause economic collapse of Catron counties outfitters and guides, which are stand-alone businesses or significant economic portions of the cattle ranching businesses.

At this point I remind you of U.S. Fish and Wildlife's responsibility to include all and any economic impact caused by changes to the original Reintroduction of the Mexican Wolf. This is an ESA requirement, and I also believe there is some concerns for the counties social/economic standing that must be addressed.

Finally, I do not support any increase in the boundaries of the reintroduction area. It would be much better to control other predators, and thus increase food supplies for the wolf within the specified boundries.

Sincerely,

A handwritten signature in cursive script that reads "Allen Campbell".

Allen Campbell