

November 13, 2015

The Honorable Sally Jewell  
Secretary of the Interior  
U.S. Department of the Interior  
1849 C Street, NW  
Washington, DC 20240

The Honorable Daniel Ashe  
Director  
U.S. Fish and Wildlife Service  
1849 C Street, NW Room 3331  
Washington, DC 20240

Dear Secretary Jewell and Director Ashe:

We, the undersigned Governors of the States of Arizona, Colorado, New Mexico, and Utah hereby express our collective and unified position regarding the U.S. Fish and Wildlife Service's efforts to develop a recovery plan for the Mexican wolf (*Canis lupus baileyi*). We have serious concerns with the Service's planned approach to recovery plan development.

We are keenly aware that a legally-sufficient, science-based recovery plan, which will serve as a foundational document for all subsequent actions and decisions related to Mexican wolf recovery, is necessary to allow our States to assess likely and potential impacts and to plan toward an eventual delisting of the subspecies. But, while we support the completion of such a recovery plan, which includes all relevant biological, social, and legal considerations, and is fully vetted by state, tribal and local governments and key stakeholders, we do not support recovery of the Mexican wolf across regions and landscapes that are not part of the subspecies' historical range.

Mexican wolf recovery is an incredibly complex and contentious issue in our States. If recovery is to succeed, it will require the support and participation of affected states as well as private parties. Recovery planning, therefore, must accord a meaningful role to state participants, beginning with the earliest stages of the planning process. Previous recovery planning efforts

have failed, in part because affected states did not have the necessary opportunities to shape both the planning process and the ultimate plan. We fear this error will be repeated in the current recovery planning process. Already, without consulting us, the Service has announced a questionable scientific approach to developing a plan, named non-neutral individuals to facilitate recovery workshops and lead modeling efforts, and specified an inappropriate venue for the workshops. Each of these choices is troubling, as is the Service's decision to make them without consulting our States, those most impacted by Mexican wolf recovery.

#### 1. Flawed Preliminary Planning Decisions

Regarding recovery planning, in an email dated August 4, 2015, Michelle Shaughnessy, Assistant Regional Director, U.S. Fish and Wildlife Service, announced the Service's intent to facilitate various workshops to discuss the development of a recovery plan. (August 4, 2015 email attached). In that email the Service announced its intention to discuss Vortex model input parameters, i.e. population objectives, prior to any discussion of geography, i.e. locations where Mexican wolf populations will be established. This is a scientifically-flawed approach. Examination of suitable locations within Mexican wolf historical range must occur prior to discussion of population objectives. The best available science includes the science of where the subspecies has historically occurred. Only after we survey existing landscapes can and should we begin to discuss how many wolves those specific landscapes are capable of sustaining.

The science of recovery is not limited to numerical recovery criteria. Where recovery takes place is of paramount importance and has to be the first step in planning the recovery of the Mexican wolf. The appropriate number of populations and individuals per population required for recovery cannot be determined by a model, rule-of-thumb, or calculations based on quantitative genetic theory. Models are useful to compare the relative value to alternative scenarios, but the actual number of animals required to no longer be in danger of extinction is determined through what is largely a normative process. Numerical recovery criteria must be constructed by considering a variety of factors, including the historical range in which the animal evolved, the landscape currently available for recovery, biomass available to sustain the recovered wolf population, and impacts to the native ungulate prey-base living in the recovered area. The recovery planning effort is unlikely to succeed if it is premised on a numerical goal, which ignores these considerations. The geography of recovery is as much a part of the science of recovery as are the numbers.

We are also seriously troubled by the panel of individuals the Service has proposed to facilitate the recovery workshops and conduct the Vortex modeling, as well as the venue selection for the workshops.

As an initial matter, the facilitator should be a neutral party, uncolored by prior wolf-related experience, and acceptable to our States as well as the Service. The facilitator identified by the

Honorable Sally Jewell  
Honorable Dan Ashe  
November 13, 2015  
Page 3

Service is not the right selection to facilitate these workshops. We strongly recommend that he be replaced by a neutral party.

Regarding the Service's selection of scientists, the panel as presently constituted will be driven as much or more by personal agenda than by science. This is unacceptable. While we generally support Mexican wolf recovery planning efforts, such efforts must be based on science, not ideology or personal agendas. Given that ninety percent of the subspecies' historical range is in Mexico, any serious recovery planning effort must headline a Mexico-centric approach rather than the translocation of the subspecies out of its historical range into new, previously uninhabited ranges of northern Arizona / New Mexico and southern Utah / Colorado.

The Service's apparent abandonment of efforts targeting recovery in Mexico is illustrated by its selection of scientist to lead the population modeling effort. Each of the scientists proposed to participate in the Vortex modeling is known for an affiliation with an advocacy position regarding the recovery of the Mexican wolf and some even have a financial interest in the subspecies' recovery. The scientists selected by the Service come to the workshop with an agenda of establishing populations of Mexican wolves north of I-40. This suggests that the Service is predisposed to look north for recovery rather than south, and is not open to other scientifically valid approaches, even where the latter have the support of our States. In order to reflect the best available science, the panel cannot be comprised entirely of scientists already wedded to one particular theory of recovery. While we support Mexican wolf recovery planning efforts, such efforts must be based on science not ideology or personal agendas. We are wholly unsupportive of a recovery planning effort that will be funneled through agenda-driven participants.

We have compiled a list of qualified, neutral scientists whom we would like to see at the helm of the Vortex modeling effort, as well as possible facilitators, and will share the list with you in the very near future.

Regarding the venue for the recovery planning effort, the COD Ranch, as the annual host for agenda-driven environmental groups, is not an acceptable location to host the recovery workshops. We call for a more appropriate venue and encourage the Service to seriously consider collaborating with its counterpart in Mexico to identify a suitable location in Mexico to host the recovery workshops.

## 2. Bi-National Recovery

To reiterate, we support the development of a Mexican wolf recovery plan. However, actual recovery of the subspecies can only be accomplished when a truly bi-national program is developed that recognizes that approximately ninety percent of the subspecies' historical habitat exists in Mexico. Arizona and New Mexico have made significant contributions to

Honorable Sally Jewell  
Honorable Dan Ashe  
November 13, 2015  
Page 4

Mexican wolf recovery, but, recovery of the Mexican wolf cannot and will not be achieved if the Service does not recognize that the majority of Mexican wolf recovery must occur in Mexico. Our four States cannot accept a recovery model that shoulders us with ninety percent or any majority of the recovery range ignoring the fact that only ten percent of the subspecies' historical range lies in the United States—across portions of southern Arizona, New Mexico, and Texas. Mexico must play a significant role in recovery planning and must be home to the lion's share of on-the-ground Mexican wolf recovery. This would not be unprecedented as other bi-national efforts between the United States and Mexico have shown promise.

Our States oppose the expansion, release, and occupancy of Mexican wolves north of I-40 in the States of Arizona and New Mexico and into Utah and Colorado. Available science does not suggest that areas north of I-40 were historically occupied by Mexican wolves. The Service should ensure that any recovery plan or related federal permit, plans, etc., clearly and consistently reflect that recovery of the Mexican wolf will occur from a northern-most boundary of I-40 south into Mexico. To this end, as the Service considers recovery and delisting criteria, it must ensure its efforts contemplate that significant management and recovery actions must to be taken in Mexico. Consistent with the Interim Endangered and Threatened Species Recovery Planning Guidance, because management and conservation in Mexico is necessary, early and continuing cooperation between the Service, Mexico, and the affected states must be an integral component of the recovery planning process.

Our States object to any proposed recovery of the Mexican wolf outside its historical range for a number of reasons. As an initial matter, the Endangered Species Act does not specifically authorize the recovery of a listed species outside its historical range, particularly when proposed host states object. Second, recovering the Mexican wolf outside its historical range, north of I-40, is neither necessary nor scientifically supported. In fact, efforts to recover the Mexican wolf north of I-40 will expose the subspecies to hybridization with the northern gray wolf (*Canis lupus occidentalis*). The resulting dispersal of hybridized wolves within core Mexican wolf populations in Arizona and New Mexico will threaten the genetic status of Mexican wolves, further jeopardizing the subspecies' recovery.

### Conclusion

There is no question that successful management of Mexican wolves for recovery and for long-term conservation purposes is entirely dependent on acceptance and tolerance by the public in the context of working landscapes and multiple uses. The Service is well aware of the critical role that social tolerance plays in the recovery and long-term conservation of the Mexican wolf and that active control promotes tolerance for the presence of Mexican wolf by responding to and minimizing impacts to private property without threatening the viability of wolf populations. Experiences teaches that Mexican wolf management and recovery will be best

Honorable Sally Jewell  
Honorable Dan Ashe  
November 13, 2015  
Page 5

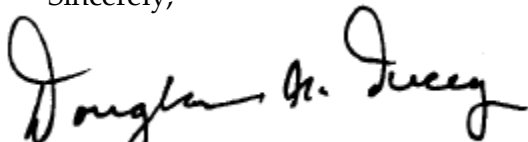
served by an enhanced outreach and response effort by the Service and enhanced state authority and involvement in the recovery of the subspecies.

Furthermore, as the Service continues its Mexican wolf recovery efforts and embarks on the development of a long-overdue recovery plan, it must demonstrate a greater commitment to managing on-the-ground issues pertaining to the Mexican wolf, specifically, conflict with existing wildlife populations, livestock, and our citizens. To date, the Service has not committed sufficient staff or financial resources to its own program, and has relied too heavily on Arizona and New Mexico to manage its program and respond to conflict-related issues. If the Service's Mexican wolf recovery program is to succeed, the Service must commit additional funds, staff, and related resources to the program.

In summary, we call upon the Service to (1) revise its backwards approach to recovery plan development and ensure that discussion of the geography of recovery precede any discussion of population objectives; (2) reexamine the panel of individuals selected to serve on the science panel and replace the existing panel with scientists less beholden to a particular outcome; and (3) work with our States to select a more appropriate venue for the recovery workshops, with serious consideration given to a location in Mexico.

Finally, we remind the Service of its obligations to effectively integrate its efforts to recover the Mexican wolf into existing working and recreational landscapes and authorities of state, tribal and local governments with regard to management of land, wildlife, and other natural resources that comprise the Southwest States' magnificent landscapes.

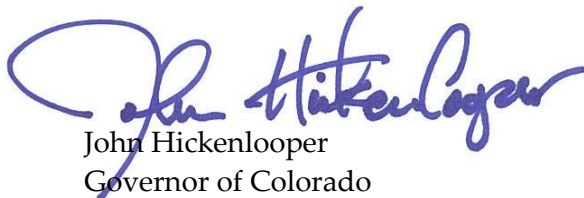
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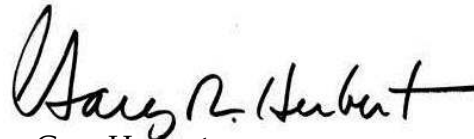
Doug Ducey  
Governor of Arizona



Susana Martinez  
Governor of New Mexico



John Hickenlooper  
Governor of Colorado



Gary Herbert  
Governor of Utah