



United States Department of the Interior



FISH AND WILDLIFE SERVICE

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April 4, 2025

Memorandum

To: Field Coordinator, Mexican Wolf Recovery Program, Southwest Region

From: Mexican Wolf Recovery Coordinator, U.S. Fish and Wildlife Service, Southwest Region

Subject: Mexican Wolf Decision Memorandum, Bear Canyon Pack

Under the Revision to the Regulations for the Nonessential Experimental Population of the Mexican wolf (*Canis lupus baileyi*) (10(j) Rule), published on January 16, 2015 (80 FR 2512) and revised on July 1, 2022 (87 FR 39348), the U.S. Fish and Wildlife Service (FWS) or designated agency may intentionally harass, implement non-lethal control measures, translocate, place in captivity, or lethally control problem wolves.

Six confirmed wolf-caused depredations, one probable wolf-caused depredation, four confirmed injuries of livestock, and two pending injuries of livestock occurred in the Bear Canyon pack territory in eastern Arizona from March 2024 to March 2025 (see chronology section). The livestock were lawfully present on federal or private land. These depredations and injuries have been associated with the Bear Canyon pack, which consists of seven wolves (three sub-adults, three adults, and one unknown age class) with two functioning radio collars (AM2563 and M3008), one non-functioning radio collar (AF1823). Four wolves do not have radio collars. It is expected the breeding female will soon den and whelp a new litter of pups, further increasing the size of this pack. Therefore, I direct the Interagency Field Team (IFT) to conduct the following management actions:

- Lethally control an uncollared wolf associated with the Bear Canyon pack from the depredation area. Removal is authorized for one wolf at this time. The Bear Canyon pack genes are still represented in the wild through siblings and the pack's breeding adults. Further, we do not anticipate that the removal of an uncollared wolf associated with the Bear Canyon pack will impact their ability to raise pups because there are other yearlings and adult members of the pack to assist in raising pups.
- Regardless of the results of the removal efforts, the IFT should continue to: (a) conduct intensive wolf monitoring, (b) maintain the diversionary food cache, (c) haze wolves following the completion of removal activities, and (d) coordinate with livestock

producers in the depredation area on future management actions to reduce the likelihood of additional depredations.

The removal order is in effect from April 4 through May 18, 2025.

Current Conditions

The Bear Canyon pack has engaged in a chronic series of depredations (six confirmed, one probable) over a period of 12 months, in which three have occurred in the last 6 weeks. In addition, four confirmed and two pending injuries of calves have occurred, three of which have taken place in the last 2 weeks. The Bear Canyon pack currently consists of seven wolves (three pups that just became yearlings, three adults, and one unknown age class) with two functioning radio collars. It is expected the breeding female will soon den and whelp a new litter of pups, further increasing the size of this pack.

Chronology of Recent Events Prompting this Management Decision

3/11/2024: Depredation of a cow – confirmed wolf. Assigned to Bear Canyon pack. The depredation was on public land.

5/10/2024: Depredation – probable wolf. Bear Canyon pack was in the area. The depredation was on public land.

5/10/2024: Depredation of a cow – confirmed wolf. Assigned to Bear Canyon pack. The depredation was on public land.

5/29/2024: Injury of three calves – confirmed wolf. Bear Canyon pack was in the area. The injuries occurred on public land.

2/26/2025: Depredation of a calf – confirmed wolf. Assigned to Bear Canyon pack. The depredation was on public land.

3/12/2025: Depredation of a calf – confirmed wolf. Assigned to Bear Canyon pack. The depredation was on public land.

3/16/2025: Depredation of a calf – confirmed wolf. Assigned to Bear Canyon pack. The depredation was on public land.

3/17/2025: Calf died from injuries – confirmed wolf. Assigned to Bear Canyon pack. The depredation was on public land.

3/17/2025: Injury of a calf – confirmed wolf. Bear Canyon pack was in the area. The injuries occurred on public land.

3/30/2025: Injury of two calves – pending confirmation. Bear Canyon pack was in the area. The injuries occurred on public land.

Management Actions Conducted to Deter/Reduce Conflicts

The rancher/permittee and IFT have taken a wide variety of preventative measures to avoid additional depredations, including:

Establishing and maintaining four separate diversionary food caches throughout April and May 2024, and during March and into April 2025. Challenges to food caching the Bear Canyon pack is the lack of roads in the area and the topography. The lowest elevation in the area is the private property along the Blue River and Blue River Road. From there the elevation immediately and drastically increases. Food caching at the lower elevations encourages the Bear Canyon pack to remain close to the private property and to utilize the areas cattle are present. The only option is to hike/horse-back to higher elevations out of the area into remote locations and given the very large volume of food packed to the four cache sites and limited personnel and resources, this is not a viable solution to implement sustainable, effective conflict reduction.

Hazing activities took place in March and April 2024. Hazing has proven to be extremely ineffective due to the terrain that the Bear Canyon pack occupies. The topography is extremely rugged and varied due to ridges and canyons throughout the entirety of the Blue Primitive Range. All effective hazing has been done within the Blue River Canyon along the Blue River Road. This is the only road in the area and where the private property occurs. Attempts at hiking and/or horseback hazing have proven to be ineffective.

Decision:

I extend my sincere thanks to all those involved in implementing field efforts to protect livestock and conserve wolves. I make my decision fully considering the following:

1. Evidence in the FWS's files shows that Mexican wolves have injured or caused the death of the aforementioned domestic animals.
2. Given the rate and proximity of the depredations, the FWS believes it is likely that Mexican wolves will continue to depredate on domestic animals in the near future without additional control measures.
3. We have considered evidence of the use of attractants or intentional feeding of Mexican wolves in the area. There is no evidence to suggest the intentional use of attractants or feeding to draw wolves into the area has occurred.
4. The basis of this removal order is livestock depredations, and thus, we have not considered evidence related to wolf/human interactions.
5. I am concerned with the numerous depredations in this area over a short period of time and the toll these depredations have caused the livestock producer. In addition, I am concerned with the additional depredations that have occurred in the area despite IFT efforts to mitigate the scenario.

6. It is the FWS's intent to recover the Mexican wolf in a manner that reduces economic impacts on the local livestock industry.

Therefore, my decision is to authorize U.S. Department of Agriculture - Animal and Plant Health Service - Wildlife Services (USDA – APHIS Wildlife Services) personnel to lethally remove an uncollared wolf associated with the Bear Canyon pack. To effectively manage a conflict situation, a radio collared alpha-member of the pack is essential to track, monitor, and haze wolves in the area. In addition, it is our intent not to remove the breeding female (wearing a non-functioning radio collar) who will likely whelp a new litter of pups soon. Therefore, a removal is only authorized for one uncollared wolf at this time which will ensure other collared wolves (AM2563, AF1823) remain in the pack. The Bear Canyon pack has genes represented in the wild through likely siblings and the pack's breeding adults.

Removal activities will cease when an uncollared wolf associated with the Bear Canyon pack is removed. I will evaluate the continuation of the authorization period based on the relevant information at the time (e.g., whether additional depredations have occurred, where cattle are located, and any additional information on the Bear Canyon pack).

In the meantime, I direct the IFT to continue or increase their proactive management efforts to reduce conflict with livestock by: (a) continuing to conduct intensive wolf monitoring, (b) continuing to haze wolves following the completion of removal activities, (c) continuing to maintain the diversionary food cache, and (d) continuing to coordinate management actions with livestock producers in the depredation area.

The Mexican Wolf Recovery Coordinator permit (ESPER0048320), issued December 27, 2022, under the provisions of 50 CFR 17.22 and 50 CFR 17.32, provides that Authorized Permittees may take any Mexican wolf in the non-essential experimental population in a manner consistent with a Service-approved management plan or species management measure the Service adopted pursuant to the provisions of 50 CFR 17.84(k), as well as to conduct activities related directly to Mexican wolf reintroduced, non-essential experimental population conservation, protection, and recovery in Arizona and New Mexico. The permit's provision R(l) provides that, "Specifically, authorization includes all actions related to: capture including, but not limited to, leg-hold traps, helicopter or ground darting and net-gunning, and captive capture methods; handling; possessing; administering health care; propagating; radio collaring, or other marking techniques; releasing, translocating, and cross-fostering; obtaining and preserving blood, tissue, fur, semen, oocytes, and other samples that are considered parts of Mexican wolves (scat is not considered a part of a Mexican wolf and can be collected without a permit); transporting between approved Mexican wolf captive management facilities in the United States and Mexico, to and from veterinarian care facilities, and to approved release sites; purposeful lethal take (purposeful lethal take is limited to Mexican wolves within the MWEPA in Arizona and New Mexico); hazing via less-than-lethal projectiles; injurious harassment; investigating known wolf GPS radio collar clusters indicative of den, rendezvous or kill sites; research; and carrying out any other USFWS-approved husbandry practice, law enforcement, or management action for Mexican wolves."

The 2022 10(j) Rule states in section 17.84(7)(vii) that "The Service or a designated agency may take any Mexican wolf in the experimental population in a manner consistent with a Service-approved management plan, special management measure, biological opinion pursuant to section 7(a)(2) of the Act, section 6 of the Act as described in §17.31 for State game and fish agencies with authority to manage Mexican wolves, or a valid permit issued by the Service through

§17.32." Thus, USDA–APHIS Wildlife Services employees are authorized to lethally control Mexican wolves in accordance with this Decision Memorandum, and any incidental wolf death or injury during this operation will be covered under the Mexican Wolf Recovery Coordinator permit (ESPER0048320). The USDA–APHIS Wildlife Services employees working under this permit will not be considered negligent when exercising appropriate methodology. Appropriate methodology is defined as USDA–APHIS Wildlife Services employees following all established policies and Standard Operating Procedures associated with Mexican wolf recovery.

I wish to thank the livestock producers in this area for their efforts to reduce Mexican wolf-livestock conflicts and working with the IFT. I also wish to thank the Arizona Livestock Loss Board for their financial compensation to the livestock producers for past, current, and any future depredation losses. I encourage the IFT to focus on field efforts and needs associated with continued wolf monitoring in the area.

Cc: Regional Director, Ecological Services, U.S. Fish and Wildlife Service, Southwest Region