

October 9, 2005

Bill Van Pelt
Nongame Birds and Mammals Program Manager
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RE: New Mexico Habitat Mapping

Dear Bill,

I feel more comfortable addressing my questions and comments to you, since the Arizona Department of Game and Fish is the lead agency on the Jaguar Conservation Team. Don't get me wrong. I like Michael Robinson, but I don't think the Center for Biological Diversity should be developing strategic plans for the jaguar or recognized as a lead.

I would like to reiterate what you and I discussed at the last jaguar meeting in Douglas. When we left the jaguar habitat subcommittee meeting in Albuquerque, August of 2004, I was under the impression the Center would not be allowed to develop the maps for New Mexico. As you may recall, Michael was not happy with the New Mexico Game and Fish Department's map and let everyone know his feelings in no uncertain terms. He successfully upset everyone with his criticisms of the Department's competence and ability in drafting their map of potential jaguar habitat. I thought we were going to wait until the Department had the technology they needed to develop another map, although I saw nothing wrong with the one they presented to the group. In fact, I find it much more realistic than Michael's map.

Needless to say, I was surprised when I found out you authorized the Center in April 2005 to develop his map. Seems to me this is just another of a dozen backroom deals you all make with NGOs. It certainly leaves a bitter taste in my mouth.

I also marvel at the way Michael wordsmiths his thesis, "Suitable Habitat for Jaguars in New Mexico". Among other things, it appears we "voted" not to forward the New Mexico Game and Fish Department's map to the Jaguar Conservation Team. That's not how I recall the events at our August meeting.

In fact there is a lot of word-smithing that I have to take exception to in Michael's essay. First, however, I'd like to know if you sent this document to Alan Rabinowitz for his comments, and if you did not, why not? It seems to me that Rabinowitz is one of a handful of wildlife biologists that has a great deal of experience with jaguars and always seems to come down on the side of sound science and what's best for the species. He is also a member of the Scientific Advisory Group (SAG) and should be consulted, in my opinion.

These are the issues I have with Michael's report:

- Michael correctly notes on Page 1 that according to the "Conservation Assessment and Strategy", it was proposed, "not later than 24 months after establishment of JAGCT, (i.e. before April 1999)", to produce "state-specific maps..... insofar as habitat can be delineated at that time". (Emphasis added).
- If Michael had been coming to the conservation team meetings since their inception he would realize why it has taken so long to develop the maps. As you are aware, we were waiting on the criteria for habitat from our SAG. He would also realize this was a goal, not a requirement, which was not set in concrete. In my observations, we only "hoped" to achieve this goal in a specific time frame. No one knew when the Strategy was being developed what kind of scientific knowledge would be required to define habitat in the Southwest as there was no studies or baseline information for this area when we began.
- As I have already expressed, Michael does a lot of word-smithing which I feel is not constructive. In the last paragraph he tries to create a crisis that must be immediately addressed by claiming there is an "urgency" to protect jaguar habitat in the United States. The only urgency that exists is in his mind. According to the Federal Register, the greatest threat to a jaguar in the United States is illegal taking which has been addressed in both Arizona and New Mexico through their efforts to increase the penalties for killing a jaguar and changes to predator control activities in the area. It should be noted no jaguars have been killed in the U.S. since a jaguar was accidentally taken in Arizona in 1986 (prior to listing). And, before 1986 it had been at least 50 years since one was killed. No jaguars have ever been taken, in either state, by modern predator control devices.
- I'm not sure why Michael feels it necessary to include Texas, Colorado and California sightings in this document, or why he feels it necessary to speculate on why jaguars are no longer found in Texas. If you recall this is an Arizona and New Mexico strategy, not a U. S. - wide assessment and strategy. Including an "Overview of the Jaguar in the United States" appears to be overreaching and intrusive in nature since most of these states have declined to participate on the jaguar conservation team.
- Michael acknowledges on Page 4 that although jaguar reports are more numerous in New Mexico and Arizona, the jaguar's very persistence in these states raises the question of why the species "was not more ubiquitous" than is suggested by a "dozen sightings". Although Michael concludes, referring to a report by Merriam and Fisher and Bell that discusses 5 jaguars killed in Arizona in 1927, that at the "turn of the century" jaguars were "hardly a rarity" in the southwest. I believe most reputable wildlife biologists would dispute his claim.

In my recollection, the report by Fisher and Bell has been attributed to the importation of jaguars by a guide/rancher in southern Arizona that brought these jaguars from South America, released them in canned hunts and received payment

for the guided hunts from customers. As a result, these "sightings" are not even included in the historical sightings for Arizona.

- As for the jaguar reports in New Mexico, it should be noted that the majority of sightings took place over 100 years ago. Many are class III sighting which tend to be vogue without any physical evidence to support the sightings. I am glad Michael excludes the Santa Fe sighting since many wildlife biologists consider this to be a "Paul Bunyan" type of sighting - the truth stretched to the max.

If you recall, Alan Rabinowitz wrote in his trip report of Southwest U.S. and Northern Mexico, June 21-26, 1997, *"[T]he fact that southwestern United States is the northern limit of the modern jaguar's range is not by chance. The more open, dry habitats of the southwest are marginal for the jaguar in terms of water, cover and prey density"*. It doesn't matter how Michael tries to paint a picture of this region, the facts and science do not support his theory that "potential habitat" for jaguars exist in the borderlands area, much less in 2/3rds of New Mexico.

- I assume the date of Warner Glenn's sighting, page 6, is a typographical error. The actual date was March 7, 1996. Michael's conclusion that the "modern era has shown the possibility of a resurgence for jaguars is, once again, far-reaching. I believe most wildlife biologists familiar with jaguars would agree with Alan Rabinowitz when he wrote in his trip report, *"[F]or at least the last century, the jaguar has been a regular, albeit infrequent, visitor to a small area of the borderlands region in the southwest United States. If there were resident breeding populations of jaguars in the past, they were very small, probably short-lived, and not viable"*.
- As for the sighting at Steins Pass, I've heard individuals speculating that Steins might be a "corridor" for the jaguar since the inception of the jaguar team. It seems very convenient this "sighting" should suddenly "pop-up".
- The other recent sightings Michael includes in his dialogue and mapping efforts are also questionable in my opinion. They all appear to help Michael build a case that the Gila Wilderness is "potential habitat" for jaguars. The first time I met Michael at a jaguar habitat subcommittee meeting at the Gray Ranch, he told us how he would like to see jaguars "romping" in his backyard in the Gila. These "sightings" only serve to help him achieve his goal. Too convenient and undocumentable, in my opinion.
- Michael does include the correct criteria for identifying jaguar habitat as defined by the Habitat subcommittee. However, he goes far beyond the Arizona Game and Fish Department's mapping efforts. If you all had included all the historical sightings in Arizona your map would have included $\frac{3}{4}$ of the state.

It might be good for everyone to understand how the historical sighting areas were limited in the mapping process for potential habitat in Arizona. Perhaps you can discuss this in your comments on Michael's proposal.

I would like to add, the jaguar actually got listed as endangered in the U.S. as a result of a petition to list, August 3, 1992, from Tony Povolitis of the Southwest Sierra Institute which was followed by a lawsuit from the Center for Biological Diversity in September of 1996. Judge Roger G Strand ruled, March 14, 1997, that the US. Fish and Wildlife Service was to list the jaguar and 4 other species as endangered within 120 days of his order. After clarification of the order, the Service listed the jaguar as endangered throughout its range on July 22, 1997.

Michael has accused me of "filibustering" the jaguar conservation team's efforts in the past. If demanding sound science and common sense be applied to the Jaguar Conservation Strategy is filibustering, then I'm guilty as charged.

Let's cut to the chase. It's obvious there are several "members" on the conservation team, including Michael and Tony, that would like to use the jaguar as their surrogate species to implement the Wildlands Project. I'm not talking about the organization, the Wildlands Project, but a report entitled the "*Wildlands Project: Plotting a North American Wilderness Recovery Strategy*". Published in a special issue of "Wild Earth", a quarterly publication of the Cenozoic Society in 1992, 75,000 copies were distributed. The majority were mailed to federal and state agencies with oversight responsibilities for wildlife and land-use planning. I'm not sure if the Arizona Game and Fish Department supports the "rewilding" effort put forth in this document, but I suspect you all strongly encourage those who would like to implement this agenda.

I am also familiar with the "Sky Islands" Michael refers to on Page 4. Not only have I read the Wildlands Project, but also an article that appeared in the Albuquerque Journal, June 15, 1997 entitled, "Trying to Preserve Wild Lands", by Mike Taugher. Taugher writes, "*Co-founded by Dave Foreman, an Albuquerque resident who in 1980 co-founded the radical environmental group Earth First!, the Wildlands Project shows how over the last few decades wilderness advocates have shifted some of their emphasis on wilderness as a place for scenery and recreation to wilderness as a place for preservation of plant and animal species*".

Taugher continues, "*[O]ne of the Wildlands Project's first proposals would be in southwestern New Mexico, southeastern Arizona and northern Mexico.*

In its preliminary form, the "Greater Gila Sky Islands" reserve would encompass 40,000 square miles, roughly half of which would be in Mexico. Within that area would be wilderness core areas, buffer zones around those cores and corridors connecting the core areas. Land-use restrictions in the buffer zones would be less restrictive than in the core areas."

When one reads the Wildlands Project, as published in 1992, it becomes clear there are individuals and organizations that would use this plan to lock up 50% of the land mass in the United States in "core reserve" areas, "buffer zones" and "corridors" where human activities would be severely limited and all economic activities prohibited in order to preserve plant and animal species.

Those who promote the Wildlands Project/Sky Island concept have let it be well-known "[T]he core areas would be "designed to protect 'umbrella species' such as, bears, wolves, bison and jaguars".

Personally, I believe in protecting and caring for our plants and animals, but not to the detriment of human beings. Mapping New Mexico and Arizona for "potential habitat" for jaguars is not going to save the few jaguars that might wander from Mexico into the borderland area. Only common sense, community support and a sound strategy based on science will accomplish this purpose.

This document needs to be scrapped and replaced by the original map as developed by the New Mexico Game and Fish Department. It is certainly more scientifically based and achievable than Michael's dream.

Sincerely,

Judy Keeler
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