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<http://jaguarhabitatusa.wordpress.com>

April 16, 2009

Larry D. Voyles, Director
Arizona Game and Fish Department
5000 W. Carefree Highway
Phoenix, AZ 85086-5000
Via E-mail: LVoyles@azgfd.gov

A Call for Jaguar Recovery

Dear Mr. Voyles:

The recent death of a jaguar in Arizona has brought to public light the urgent need for a program to recover the jaguar in the American Southwest. We ask that you commit the Arizona Game and Fish Department to reestablishing a resident population of jaguars.

We all can be proud of the efforts that Arizona has recently made in recovering endangered species such as the California condor and black-footed ferret, and its past efforts at restoring populations of depleted or extirpated game species such as American elk and pronghorn.

In connection with our request, please withdraw the public document entitled "Jaguar Conservation Assessment for Arizona, New Mexico, and Northern Mexico" (final draft March 2009). The document, prepared under the state-led "Jaguar Conservation Team," is a tragically misguided attempt by some in your agency to establish a state policy opposing jaguar recovery.

The "assessment" also poses unjustified risk to wild jaguars by recommending research-related captures, despite serious outstanding questions surrounding the capture-related death of jaguar Macho B.

Our specific objections to the “assessment” are presented in a letter to Mr. Terry B. Johnson, the primary author of the document (see attached below). We would be happy to review this matter with you in detail, and provide further documentation in support of our objections.

In short, we ask that you develop a program in cooperation with the US Fish & Wildlife Service that can achieve jaguar recovery. As you know, the U.S. District Court of Arizona recently ruled that the Service meet the requirements of the US Endangered Species Act by working toward a formal Recovery Plan for the jaguar. This is an opportune time for your agency to demonstrate conservation leadership by encouraging, supporting, and collaborating on jaguar recovery work.

It is of utmost importance that you commit the Arizona Game and Fish Department to jaguar recovery and support cooperative recovery planning at this time. We are ready to assist you in every way possible to advance this goal.

Sincerely,

Tony Povilitis

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Campaign Director
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Cc -

Bob Hernbrode, Chairman, AZ Game and Fish Commission
Tod Stevenson, Director, NM Department of Game and Fish
Jim McClintic, Chairman, NM State Game Commission
Janice K. Brewer, Governor of Arizona
Bill Richardson, Governor of New Mexico
Representative Raul Grijalva Arizona
Representative Gabrielle Giffords, Arizona
Representative Martin Heinrich, New Mexico

April 16, 2009

Terry B. Johnson, Chair
AZ-NM Jaguar Conservation Team
Arizona Game and Fish Department
5000 West Carefree Highway
Phoenix, Arizona 85086
Via email: jaguar@azgfd.gov

Dear Mr. Johnson:

It has been 13 years since the establishment of the Jaguar Conservation Team (JCT). During that time JCT has failed to protect habitat for jaguars, has not planned for jaguar recovery, and has failed to justify and minimize the risk to jaguars from capture-related research, a failure directly or indirectly resulting in the death of a wild jaguar in Arizona.

In your revised JCT policy document "Jaguar Conservation Assessment for Arizona, New Mexico, and Northern Mexico" (final draft March 2009) you attempt to obscure these failures through a series of unsubstantiated claims and rationalizations.

Failure to Protect Habitat

There are about a dozen habitat linkages in southern Arizona that are seriously threatened by urban sprawl and other factors. These have been identified by scientists with our Jaguar Habitat Campaign, the Arizona Wildlife Linkages Workgroup, Northern Arizona University, and others. Rather than committing the JCT to their protection, the "assessment" misleadingly implies that there is already a "comprehensive effort" under the recently established Arizona Linkages Workgroup (p. 36). However, it fails to mention that there has been no direct effort on the part of that state-led group to protect these specific jaguar habitat linkages, and makes no mention of any plans to do so.

The "assessment" states that "the primary concern now with regard to jaguar conservation in the U.S.-Mexico borderlands is clearly *potential* for future loss, fragmentation, and modification of habitat"(p. 20, my emphasis). The document further claims that "habitats within the primary emphasis area for jaguar conservation in the United States are managed in ways that are largely conducive to supporting jaguars" (p. 20). Are you not fully aware of the ongoing degradation of habitat in southern Arizona? We would welcome the opportunity for a joint field trip to examine and discuss the full extent of the problem.

After a general review of human impacts on the landscape and the importance of habitat connectivity conservation, the "assessment" makes a remarkable about face, skipping specifics on connectivity conservation for jaguars in favor of a discussion on opposing stakeholder values (pp.27-29). Without applying fundamental conservation principles and values, it is not surprising then that JCT cannot bring itself to do jaguar habitat conservation work.

You are well aware of the commitment that JCT made (Jaguar Conservation Assessment and Strategy 1997) to "coordinate protection of jaguar habitat"; "identify, maintain, and promote

existing and other suitable jaguar habitats”; “provide each land management agency cooperator with guidelines for conducting an assessment of the impacts of its current and planned actions on the jaguar”; “evaluate the potential impacts on jaguars and jaguar habitat of each new project”; and, enter into “protection and enhancement agreements for suitable jaguar habitat with federal and state land managers and willing private landowners.” These tasks were never completed (despite urging and work done by me and others toward that end), and have been dropped as JCT objectives.

Failure to Pursue Jaguar Recovery

The “assessment” attempts to discredit the conservation goal of reestablishing a resident population of jaguars in Arizona, New Mexico, and northern Mexico. It dismisses scientific evidence and analysis indicating historic occurrence of a resident jaguar population in Arizona and New Mexico (while ironically referencing some of it; pp. 8, 18, 30, 31). The document draws the spurious conclusion that the number of jaguars historically present in AZ/NM cannot be considered a “population,” based on a flawed assumption that jaguar records (mostly of kills) meaningfully reflect actual jaguar numbers at any given point in time, namely “0 to very few individuals” (p. 49). The “assessment” features this faulty conclusion on its list of “what we know” about jaguars in AZ/NM (p. 49), while ignoring strong evidence for the past existence of a jaguar population that was depleted by human-caused mortality, information on the difficulty of detecting an animal that is cryptic and secretive by nature, historic overexploitation of jaguar prey (which would have indirectly reduced naturally-occurring jaguar numbers), and the general lack of jaguar field detection work.

The “assessment” also asserts that “AZ-NM has limited, marginal jaguar habitat” (p. 48). It bases this conclusion on speculative opinion and its own failure to examine the issue analytically, despite the availability of reports and publications that do so. Ironically, the document points to these reports (p. 15) and to cases of jaguars occupying arid environments elsewhere (p. 13-14).

Considering habitat requirements for jaguars, as discussed in the “assessment” and elsewhere, there is no reason why jaguars cannot thrive in AZ/NM if their habitat is protected and if steps are taken to rebuild their numbers. In fact, the “assessment” itself points out that the region has “healthy populations of native prey” (p. 20), a key factor in habitat suitability (this stands in sharp contrast to concerns expressed about the status of the jaguar’s prey base in northern Mexico, p. 14). Additionally, the jaguar is characterized as a habitat generalist, namely a large-carnivore tending to have broader habitat tolerances than many other species as well as important effects on the health of natural ecosystems of which it is a part (p. 15).

JCT’s failure to pursue jaguar recovery is not a matter of misinterpreting scientific or other data on jaguars but rather a calculated policy decision. Perhaps the most telling example was its dismissal of jaguar habitat maps that had been carefully developed by its own habitat committee over a period of two years (of which I was a member). The final maps, based on criteria suggested by a scientific advisory group, were intended to advance jaguar habitat conservation.

Finally, the “assessment” provides no evaluation of options to rebuild jaguar numbers in AZ/NM through reintroductions. Yet reintroduction is a conservation tool commonly used to restore endangered species. For example, it has been recently used to restore the California condor and

the black-footed ferret in Arizona. Unfortunately, the JCT has renounced this tool for jaguars without ever conducting an objective feasibility study.

Unjustified Capture of Jaguars

The “assessment” dogmatically recommends further capture of jaguars (pp. 50-51) despite serious outstanding questions surrounding the recent capture-related death of jaguar Macho B. The JCT has not objectively weighed the risks of research-related death or injury to rare jaguars against potential data applications, if any, to jaguar recovery. Perhaps this is because “jaguar recovery” is not a relevant goal for the group. Nevertheless, there are important ethical issues about capture-related work that must be addressed. At a JCT meeting not long ago, I suggested that, while it would be nice to obtain data from a radio-collared jaguar or two, the risk of injury or death to these animals upon capture may not be justified in this case: essential information is already available to advance conservation of jaguars and their habitat in AZ/NM.

The “assessment” postulates that capture and collaring jaguars would provide “crucial detail” about the animal (p. 50) but does not indicate how crucial or crucial to what. You need to follow the logic closely before continuing to recommend capture-related research that jeopardizes exceedingly rare animals.

Conclusion

The “assessment” demonstrates no intention of advancing jaguar recovery in the Southwest. The document is contrived, patently biased, and designed to oppose that goal.

Sincerely,

Tony Povilitis

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