

June 24, 2010

Brian Millsap, Assistant Regional Director  
US Fish & Wildlife Service (USFWS)  
Albuquerque, NM 87103

Dear Mr. Millsap,

Thank you for your letter of June 11, 2010 regarding my concerns about your agency's permit (TE-821577) to the Arizona Game and Fish Department (AGFD) related to capture of endangered jaguars.

In my June 4, 2010 letter, I expressed concern about the non-specificity of the permit language stipulating that trail cameras or hair snares with jaguar-derived attractants or baits not be used by AGFD "in conjunction with" a capture device. In order to avoid unintended capture of a jaguar, the Service should require a minimum distance between attractant cameras or hair snares set specifically for jaguars and physical traps set for other species, and a minimum time interval between the use of jaguar camera lures and a large-carnivore trap at the same general location. Under this permit, the Service fails to safeguard jaguars against unwarranted capture, injury, and death resulting from inadequate spatial or temporal separation of the devices.

You characterized the potential for accidental capture of jaguar in snares set for other large carnivores as generally "very small" due to the rarity of jaguars. However, if snares are used in an area known to be traversed by a jaguar the risk of accidental capture would be significant, especially if the snare were baited with meat.

Paragraph 3 of your letter justifies the risk of accidentally capturing a jaguar on grounds that the capture-related study of other large carnivores as surrogates for the jaguar can yield information on how jaguars move through or around border barriers. Has this assumption been evaluated? Has the Service used existing data or analysis to assess the likely behavioral response of jaguars to physical barriers? Could track surveys or other methods provide data of equal or better value than capture/telemetry studies?

My point is that jaguar recovery planning requires careful evaluation of research goals, expectations, and alternatives weighed against potential harm to rare, endangered jaguars. That is why in my earlier letter I suggested that a scientific recovery team for the jaguar be assembled and a recovery plan prepared *before* permitting capture-related research in a jaguar area. How doubly tragic it would be, for example, if a female jaguar were caught in a snare and killed, and subsequent inquiry found little or no offsetting justification for using such devices where jaguars occur.

Permit TE-821577 allows the AGFD to propose a capture-related study of jaguars under its direction and supervision. Yet, in the case of Macho B's death, the AGFD, at best, failed to adequately supervise large carnivore research in the area occupied by the animal. Investigations of the Macho B incident (and of possible AGFD misdoings) are still ongoing, as you noted.

Despite these circumstances, you seem to suggest that the Service is obligated by law to issue a permit to AGFD to capture jaguars. Why not let a USFWS jaguar recovery team determine if data from captured jaguar is necessary for a species recovery program, and, if so, prepare an appropriate research project? It is hard to understand why, at this time, the Service would rather pass that assignment via the permitting process on to AGFD, an agency that showed little competence in jaguar recovery over the course of a dozen plus years of being “in charge” (a primary reason why a federal program is now underway).

In the 1990s, I asked the Service to list the jaguar as endangered in the U.S. and protect its critical habitat. Since then I have witnessed a dramatic decline in habitat connectivity in southern Arizona. Habitat loss for the most part continues, and many wildlife linkages are in imminent danger of being entirely lost. Yet I sense no urgency on the part of the Service to provide much needed leadership in protecting habitat connectivity for the region, essential for the conservation of the endangered jaguar, Mexican gray wolf, ocelot, and other species.

There is a habitat fragmentation crisis in southern Arizona that requires immediate attention by the Service. **I would like to invite you and other Service officials responsible for jaguar recovery to join me on a field trip to Cochise, Pima, and Santa Cruz counties for a first-hand look at habitat conditions, emphasizing areas currently identified as wildlife movement corridors.** I would be happy to prepare a 2-day itinerary and suggest accompanying materials, such as maps showing land cover changes in recent years.

Please let me know what dates for the proposed field trip would be convenient. I hope you will accept my invitation.

Sincerely,

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