



January 26, 2022

Public Comments Processing  
Attn: FWS-R2-ES-2021-0103  
U.S. Fish and Wildlife Service  
MS: PRB/3W  
5275 Leesburg Pike  
Falls Church, VA 22041-3803

**Re: Revision to the Nonessential Experimental Population of the Mexican Wolf**

**Submitted electronically:** <http://www.regulations.gov>, Docket No. FWS-R2-ES-2021-0103

Arizona Sportsmen for Wildlife Conservation (AZSFWC) appreciates the opportunity to comment on revisions to the experimental population 10(j) rule covering the Mexican wolf in Arizona and New Mexico. AZSFWC is a 501c-3 non-profit organization dedicated to wildlife conservation, habitat work, youth recruitment and retention, as well as educating outdoor enthusiasts on issues important to their passions. AZSFWC member groups reach across the spectrum of hunting, angling, shooting sports, outdoor recreation, as well as businesses from across Arizona, representing more than 16,000 people.

In response to a 2018 remand from the Federal District Court of Arizona, and to align with a revised 2017 recovery plan, the US Fish and Wildlife Service (USFWS) has prepared a draft Supplemental Environmental Impact Statement (SEIS) and revision to the 2015 10(j) rule covering the Mexican wolf.

AZSFWC is on record supporting the revised Recovery Plan and the 2015 10(j) Rule as noted in the attached letters dated 08/29/17 and 06/15/20, respectively. AZSFWC understands the Court's decision required USFWS to address specific issues while revising the 10(j) rule. We are pleased to see that the proposed rule retains core elements central to our support of the Mexican wolf recovery process, however other aspects of the revision are of considerable concern to our membership. We offer the following specific comments.

**Mexican Wolf Population Status** - we appreciate and support the decision to retain the nonessential experimental status for Mexican wolves in Arizona and New Mexico. The management flexibility afforded by 10(j) is essential to maintaining broad stakeholder support for reintroduction of wolves and effective recovery of the subspecies.

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**Experimental Population Area** - we likewise applaud the decision to retain the existing boundary of the experimental population area (MWEPA). This boundary reflects the best available science on the historical distribution of the Mexican wolf and is critical to maintaining the genetic integrity of this unique taxonomic unit. Allowing Mexican wolves to spread outside of the MWEPA, particularly north of Interstate 40, poses significant risk of "genetic swamping" by the larger and behaviorally dominant northern gray wolves that have already "dispersed" into Arizona on at least one occasion, and will likely do so again in the future.

The Mexican wolf recovery effort represents millions of taxpayer dollars and decades of work by the Arizona Game and Fish Department (AZGFD), USFWS, and other partners. It must not be compromised in order to accommodate the short-sighted vision of particular interest groups. To provide clear direction moving forward, the final rule (not just the preamble) should clearly state that Mexican wolves dispersing outside the MWEPA, particularly north of Interstate 40, will be captured and relocated or returned to captivity, as appropriate.

**Population Objective** - in response to the court's decision, the hard population cap in the 2015 rule has been replaced with a target average of greater than or equal to 320 Mexican wolves in Arizona and New Mexico combined. The rule (p. 59960) also states that once this objective is reached, the population would fluctuate "*between the mid-300s to low 400s*" but could exceed that number due to "*natural population growth*."

AZSFWC understands that this objective reflects extensive population modeling using the best available science. However, as written, the draft rule implies that the wolf population could grow indefinitely. This open-ended approach is of great concern to AZSFWC and others who are currently supportive, or at least tolerant of restoring Mexican wolves to the Southwestern landscape. Mexican wolf recovery must be managed in a manner that respects stakeholder concerns, does not adversely impact ungulate populations and associated hunting opportunities, and does not compromise other legitimate uses of public and private lands.

The lack of clarity in the population objective also opens the door for further legal challenges, which have already consumed massive amounts of resources better spent on actual recovery. The final rule must address this uncertainty around the population objective, perhaps by identifying an upper population limit that reflects expected variability around the 320 wolf average.

**Genetic Objective** - AZSFWC understands that maintaining genetic diversity is an important element of Mexican wolf recovery. The genetic objective in the revised rule (22 released wolves of breeding age in the wild population) reflects the best currently available science and is supported by our organization. This should be accomplished by cross fostering captive-born pups with wild adults, rather than release of captive-bred adult wolves. There is abundant evidence that the latter approach has not been particularly successful at recruiting animals into the breeding wild population.

**Restrictions on Take** - AZSFWC understands that the recovery effort has been hampered by loss of Mexican wolves from the wild population. However, it is important to note that while illegal killing of wolves has been a factor, a large proportion of these mortalities were road kills. This should be clearly articulated in the final rule, providing clarity for the public and interest groups engaged in the ongoing controversy over Mexican wolves.

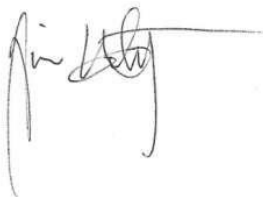
We are particularly concerned by language in the EIS Preferred Alternative (#1) and draft rule that prevents take of wolves in order to address unacceptable impacts to ungulate populations, until the genetic objective is met. We are likewise puzzled by language in the draft rule (p. 59962) which appears inconsistent with what we understood to be a collaborative effort between USFWS and its state partners:

**"(E) No requests for take in response to unacceptable impacts to a wild ungulate herd may be made by the State game and fish agency or** accepted by the USFWS until the genetic objective at paragraph (k)(9)(v) of this section has been met." [emphasis added]

The ability to address impacts to ungulate populations has been central to support of the Mexican wolf recovery effort by AZSFWC and other stakeholders. The SEIS and draft rule state that impacts to ungulate populations have yet to be documented and are not anticipated before reaching the benchmark of 22 released wolves in 2030. However, these are predictions that may or may not be accurate, leaving an uncertain future for ungulate populations already impacted by historic drought.

AZSFWC and 30 of our member organizations (list follows) believe it is important to retain management flexibility and therefore we support EIS Alternative #2, which leaves the existing take provisions in place.

We appreciate your consideration of our comments in preparing the final SEIS and 10(j) Rule.



Jim Unmacht  
Executive Director

**AZSFWC Member Organizations Supporting Comments on  
the Revision to the Nonessential Experimental Population  
of the Mexican Wolf**

Anglers United  
AZ Antelope Foundation  
AZ Bass Nation  
AZ Big Game Super Raffle  
AZ Bowhunters Association  
AZ Chapter National Wild Turkey Federation  
AZ Chapter Safari Club International  
AZ Council of Trout Unlimited  
AZ Deer Association  
AZ Desert Bighorn Sheep Society  
AZ Elk Society  
AZ Flycasters Club  
AZ Houndsmen's Association  
AZ Outdoor Adventures  
AZ Outdoor Sports  
AZ Predator Callers  
AZ Taxidermy Association  
Ben Avery Clay Busters  
Christian Hunters of America  
Mohave Sportsman Club  
No Excuse Hunting and Outdoors  
Outdoor Experience 4 All  
Southern AZ Quail Forever  
Southwest Wildlife Foundation  
Sportsmen's Business Alliance  
SRT Outdoors  
The BASS Federation of AZ  
Theodore Roosevelt Conservation Partnership  
Valley of the Sun Quail Forever  
Yuma Valley Rod & Gun Club