



May 16, 2022

**RE: Docket No. FWS-R2-ES-2022-0018
Revisions to the USFWS Recovery Plan for the Mexican Wolf**

Comments submitted electronically at <https://www.regulations.gov>

Arizona Sportsmen for Wildlife Conservation (AZSFWC) appreciates the opportunity to comment on a second revision to the 2017 Recovery Plan for the Mexican Wolf, prepared by the US Fish and Wildlife Service (FWS).

AZSFWC is a 501(c)-3 non-profit organization dedicated to wildlife conservation, habitat improvement, youth recruitment and retention, as well as educating outdoor enthusiasts on issues important to their passions. AZSFWC member, affiliate, and associate groups reach across the spectrum of hunting, angling, shooting, outdoor recreation, and businesses from across Arizona, representing more than 20,000 people from Arizona.

AZSFWC's support for the 2017 Recovery Plan is outlined in our August 29, 2017 letter (attached). We are pleased to note that critical elements of concern to our membership have been carried forward in the proposed revision. We also appreciate the close coordination between FWS and the respective Arizona and New Mexico state wildlife agencies in developing this revision.

This revision addresses the October 2021 remand of the Recovery Plan by the Federal District Court of Arizona, the central issue being reduction of human-caused wolf mortalities in the Mexican Wolf Experimental Population Area (MWEPA). Human-caused mortality presents a potential challenge to wolf recovery; however, current data indicate that such mortality is **below** the threshold to adversely impact the current trajectory toward meeting demographic recovery criteria. We support additional efforts to reduce human-caused wolf mortality, but these must be supported by the best available science and also be fiscally prudent.

AZSFWC offers the following specific comments on five key elements of the revised plan:

AZSFWC comments on Second Revision to the Mexican Wolf Recovery Plan – 5-16-22

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Law Enforcement – AZSFWC supports efforts to reduce illegal take of Mexican wolves. These should be closely coordinated with state wildlife agencies who provide the vast majority of boots on the ground - their resources are finite and often overextended. FWS should base any cooperative enforcement efforts on thorough analysis of areas where illegal take has occurred.

Hunter Education and Outreach – There have been a small number of highly-publicized incidents where Mexican wolves were accidentally taken by hunters while legally pursuing other species. AZSFWC asserts that these impacts have been biologically insignificant with respect to meeting recovery criteria but supports outreach efforts to reduce such mortalities in the future. That said, going forward, it is incumbent on FWS to be open and transparent about causes of Mexican wolf mortality and their respective impacts on recovery criteria parameters.

Vehicle-Associated Mortalities – A number of Mexican wolves have been road-killed by vehicles inside and outside the MWEPA. The tremendous human population growth in Arizona and associated traffic volumes have exacted a significant toll on many species of wildlife, wolves among them. The Arizona Game and Fish Department (AZGFD) and Department of Transportation have over two decades experience researching and managing wildlife-vehicle conflicts on major travel corridors. Those efforts have proven extremely successful when guided by site-specific data on wildlife behavior and movements. A similar approach would be appropriate for the Mexican wolf, especially if considering expensive crossing structures or other infrastructure modifications.

Adaptive Management of Wolf Removal – AZSFWC support for Mexican wolf recovery efforts has been conditioned on avoiding adverse impacts to ungulate populations. In our January 26, 2022 comment letter regarding the Revision to the Nonessential Experimental Population of the Mexican Wolf (attached), we expressed support for Alternative #2 in the Supplemental Environmental Impact Statement, which would retain management flexibility (specifically, take of wolves by non-lethal means) to address such impacts. Once again, we are reiterating that position.

Population Objective – Finally, AZSFWC reiterates our concerns relative to the population objectives as expressed in our January 26, 2022 letter:

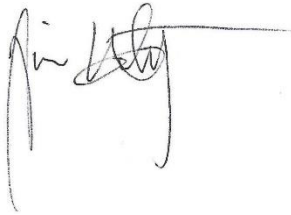
In response to the court's decision, the hard population cap in the 2015 rule has been replaced with a target average of greater than or equal to 320 Mexican wolves in Arizona and New Mexico combined. The rule (p. 59960) also states that once this objective is reached, the population would fluctuate "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.

Thank you for your consideration of our comments.

A handwritten signature in black ink, appearing to read "Jim Unmacht", with a long horizontal line extending to the right.

Jim Unmacht
Executive Director