



August 29, 2017

Submitted electronically via [www.regulations.gov](http://www.regulations.gov)

Public Comments Processing  
Attn: FWS-R2-ES-2017-0036  
U.S. Fish and Wildlife Service, MS: BPHC  
5275 Leesburg Pike  
Falls Church, VA 22041-3803

RE: Draft Mexican Wolf Recovery Plan, FWS-R2-ES-2017-0036

On behalf of Arizona Sportsmen for Wildlife Conservation (AZSFWC) please accept this letter as a formal comment on the proposed Draft Mexican Wolf Recovery Plan (Plan).

AZSFWC is a 501c-3 organization dedicated to wildlife conservation, habitat work, youth recruitment and retention, as well as educating sportsmen and women on issues important to their passions. We have 34 member organizations and 7 affiliate members that reach across the spectrum of hunting, angling and outdoor recreation groups and businesses from all across Arizona.

At the outset, we'll tell you we support the proposed Plan, however with that said; we also have some comment and observations on the entire matter. The groups and people that advocate for no wolves ignore the fact the Endangered Species Act (ESA) mandates a recovery plan. The groups and people that want unlimited wolves across the American Southwest have total disregard for the 21<sup>st</sup> century landscape, as well as the communities, the counties, landowners, ranchers, farmers and wildlife managers, not to mention the Mexican wolf's historical range in the United States was only 10% of the total.

With 90% of the wolf's historical habitat in Mexico, we are very pleased to see that component is not merely mentioned in the Plan, but an integral part of the animal's recovery efforts. We appreciate the continued cooperative efforts with Mexico and the goal of establishing multiple recovered populations in that country.

The Mexican wolf recovery efforts over the last three plus decades have already cost the American taxpayer tens of millions of dollars. The projected costs for future recovery work (\$262M+) should not be burdened by the American taxpayer alone!

While we understand there will be increasing costs over time for a myriad of reasons, we implore you to maintain flexibility in the process and to tailor the recovery efforts based on

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funding. Spending what amounts to more than a million dollars per animal is patently absurd! If more cost effective alternatives are developed we would strongly encourage you to consider them, particularly as expressed in your opening disclaimer.

We believe it's extremely important for the viability of the Plan to have and maintain objective, measureable and achievable goals within the designated historical habitats. With representation from multiple habitats, redundancy with two populations and resiliency in the numerical recovery criteria, this approach should help mitigate any existing or potential threats to the success of the Plan.

We support the targeted population goal in the United States within the Mexican Wolf Experimental Population Area (MWEPA) of an average of 320 wolves, with an upper limit of 380 based on modeling data. However, if populations of the prey base begin to see adverse effects due to these numbers, we would strongly suggest that's a point where flexibility in the Plan is critical in order to counter those effects.

We support the northern MWEPA boundary at I-40 for both habitat reasons, as well as genetic reasons. Extending the boundary north into what might be considered "acceptable" habitat, might feel good to some advocates, but with northern wolves already demonstrating they can reach some of those parts, the risk of genetic mixing from the larger species would only dilute the Mexican wolf gene pool and potentially jeopardize any Mexican wolf recovery efforts.

We support the cross-fostering efforts under way as a viable alternative to releasing naïve adult wolves directly into the recovery area. While release of captive wolves may be necessary on occasion, clearly wolf pups raised by wild adults assimilated to the landscape have proven to be a preferred option.

We would encourage strict adherence to the outlined reporting periods, and a concerted effort at transparency in the planning effort. We think that is important not only for information purposes, but also for social acceptance across the MWEPA area.

AZSFWC and 22 of our member organizations support the U.S. Fish and Wildlife Service and the Arizona Game and Fish Department (AZGFD) in this recovery effort. We also support the AZGFD comments and input on the Plan. As those recovery efforts continue and the Plan is implemented, we would encourage strong cooperation with AZGFD to reach and maintain the goals and objectives that have been proposed in the Plan with the ultimate goal of delisting the Mexican wolf.

Thank you.

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

Jim Unmacht  
Executive Director

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## **AZSFWC Member Organizations supporting the Draft Mexican Wolf Recovery Plan**

Anglers United  
AZ Antelope Foundation  
AZ Bass Federation Nation  
AZ Big Game Super Raffle  
AZ Chapter of National Wild Turkey Federation  
AZ Council of Trout Unlimited  
AZ Deer Association  
AZ Desert Bighorn Sheep Society  
AZ Elk Society  
AZ Houndsmen  
AZ Outdoor Sports  
AZ Shooting Sports Education Foundation  
Christian Hunters of America  
Coconino Sportsmen  
Mohave Sportsman Club  
Outdoor Experience 4 All  
South Eastern AZ Sportsmen Club  
Southwest Wildlife Foundation  
SRT Outdoors  
The BASS Federation  
Xtreme Predator Callers  
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