



January 19, 2022

Public Comments Processing
Attn: FWS-HQ-ES-2021-0106
U.S. Fish and Wildlife Service, MS: PRB/3W
5275 Leesburg Pike
Falls Church, VA 22041-3803.

Submitted electronically:

<http://www.regulations.gov>, Docket No. FWS-HQ-ES-2021-0106

Re: 90-Day Finding for Two Petitions To List the Gray Wolf in the Western United States

Arizona Sportsmen for Wildlife Conservation (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, affiliate, and associate groups reach across the spectrum of hunting, angling, shooting, outdoor recreation, and businesses from across Arizona. Our member groups represent more than 16,000 people from Arizona.

AZSFWC understands the U.S. Fish and Wildlife Service (USFWS) is currently conducting a status review in response to two petitions to list the Gray wolf as threatened or endangered in the Northern Rocky Mountains and Western United States. We appreciate the opportunity to provide comment on this review.

Both petitions include portions of Arizona as part of the distinct population segment (DPS) recommended to be listed. We consider these proposals without merit from a conservation standpoint and an existential threat to recovery of the endangered Mexican wolf, an effort that our organization has supported under the Recovery Plan (see attached letter dated 08/29/17) and 2015 10(j) rule (see attached letter dated 06/15/20).

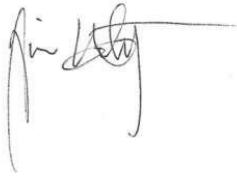
The Arizona portion of the proposed DPS would not make a meaningful contribution to recovery of the Gray wolf. Habitats in that area are arid and largely devoid of elk, the primary prey for Gray wolves. Historical data indicate that wolves were relatively uncommon.

Of greatest concern is potential interbreeding between dispersing Gray wolves and Mexican wolves in the Arizona and New Mexico Experimental Population Areas. This "genetic swamping" effect is well documented in the scientific literature (see attached paper by Odell et al. 2018) and would effectively doom recovery of the Mexican

subspecies under the current Recovery Plan and 10(j) rule. That effort represents millions of taxpayer dollars, the best available science, 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.

Finally, we note that one of the petitions (Petition 1, p. 19) is factually incorrect in stating that the State of Arizona has "*no protections in place for wolves.*" Wolves in Arizona are fully protected under state statutes (ARS 17-309 and 17-314) and by the Federal Endangered Species Act. AZGFD and its partners have extensive, ongoing outreach efforts to educate hunters and the public about the protected status of wolves, including efforts to recover our unique Mexican subspecies.

AZSFWC and 26 of our member organizations (list follows) appreciate your consideration of this vital information in preparing the forthcoming 12-month finding on the two petitions.

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

Jim Unmacht
Executive Director



**AZSFWC Member Organizations Supporting Comments
on the 90-Day Finding for Two Petitions To List the
Gray Wolf in the Western United States**

Anglers United
AZ Antelope Foundation
AZ Bass Nation
AZ Big Game Super Raffle
AZ Bowhunters Association
AZ Chapter of NWTF
AZ Chapter of SCI
AZ Deer Association
AZ Desert Bighorn Sheep Society
AZ Elk Society
AZ Flycasters Club
AZ Houndsmen Association
AZ Outdoor Adventures
AZ Outdoor Sports
AZ Predator Callers
AZ Taxidermy Association
Christian Hunters of America
Mohave Sportsmen Club
Outdoor Experience 4 All
Southern AZ Quail Forever
Southwest Wildlife Foundation
SRT Outdoors
The Bass Federation of AZ
Theodore Roosevelt Conservation Partnership
Valley of the Sun Quail Forever
Yuma Valley Rod and Gun Club