



June 15, 2020

Public Comments Processing
Attn: FWS-R2-ES-2020-0007
U.S. Fish and Wildlife Service, MS: PRB/PERMA (JAO/1N)
5275 Leesburg Pike
Falls Church, VA 22041-3803.

Re: Notice of intent to prepare a supplement to the Environmental Impact Statement on the 2015 revision to the nonessential experimental population of Mexican wolf

Submitted electronically: <http://www.regulations.gov>
Docket No. FWS-R2-ES-2020-0007

Arizona Sportsmen for Wildlife Conservation (AZSFWC) is a 501c-3 organization dedicated to wildlife conservation, habitat improvement, hunter recruitment and retention, as well as educating sportsmen and women on issues important to their passions. AZSFWC's member, affiliate, and associate organizations represent in excess of 10,000 sportsmen and women who span the spectrum of hunting, angling, shooting and outdoor recreation groups and businesses across Arizona.

AZSFWC appreciates the opportunity to comment on the supplemental Environmental Impact Statement (SEIS) and potential revisions to the 2015 Final Rule covering designation of the Mexican Wolf Experimental Population Area (MWEPA) in Arizona and New Mexico, being prepared by the U.S. Fish and Wildlife Service (Service).

AZSFWC supports current efforts to conserve the species, with the caveat that this be done in a manner that is supported by the best available science, does not adversely impact populations of economically and recreationally important wildlife species, and does not compromise responsible multiple-use management on public lands occupied by the Mexican wolf.

The Notice of Intent requests information on three issues covered in the 2018 Arizona District Court ruling, indicating that in order to be considered, comments must be accompanied by supporting information and appropriate citations from the scientific literature. In the comments that follow, we offer AZSFWC perspective on those issues.

AZSFWC comment on USFWS SEIS and Proposed Revisions to 2015 Rule for MX Wolves – 6-15-20

Arizona Sportsmen for Wildlife Conservation
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In support, we have appended detailed comments prepared by our state wildlife agency the Arizona Game and Fish Department (AZGFD), which include relevant data and citations from the scientific literature.

In preparing the supplemental EIS and revisions to the Final Rule, the Service must apply the best available science, as well as new information that was not available when the court took up the case in 2015. These include the 2017 update to the Mexican Wolf Population Viability Analysis (PVA) and the bi-national Recovery Plan signed in 2017.

AZSFWC and 24 of our Member Organizations believe the picture is clear and unambiguous, and that significant positive progress toward wolf recovery has occurred since elements of the 10(j) rule were remanded by the court.

Specifically:

1. Essentiality determination - the captive Mexican wolf population has increased dramatically since 2015, with the majority of captive wolves now at prime reproductive ages. This growing captive population has higher genetic diversity than free-roaming wolves in the U.S., and represents a more than adequate reservoir to restart wild populations, should that be required in the future. In addition, there are now wild, reproducing wolves on a large tract of high-quality native range in Mexico. This data strongly supports preserving the designation of "experimental nonessential" for the species, and rendering the change to "essential" as unwarranted.

2. Alignment of population objective and release recommendations - the PVA analysis completed in 2017 provides a much clearer picture of wolf population trajectory than was available in 2015, including more reliable estimates of the influence of inbreeding and expected mortality rates of free-roaming wolves. This data supports the population objective in the Recovery Plan along with the numbers of breeding-age wolves that need to be added to U.S. and Mexican populations in order to maintain genetic diversity. Experience gained since the court ruling has also shown that release of adult, captive-raised wolves contribute little to genetic diversity of the wild population. That objective has been effectively addressed by cross-fostering captive-reared pups into dens of wild wolves and safely retaining genetically valuable adults in captivity, a practice that should continue. The alignment that the Service seeks can be readily accomplished by incorporation of the 2017 Recovery Plan into the SEIS.

3. Population-level genetic health - AZSFWC takes issue with the court finding that the recovering Mexican wolf population is in genetic decline. The currently available scientific information does not show a statistically significant decline in genetic diversity. Additionally, dozens of genetically valuable wolves have been added to the wild population in the last 5 years. In preparing the SEIS, the

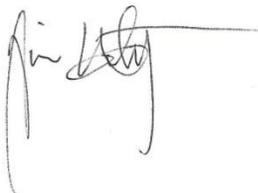
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Service must analyze the full dataset from all free-ranging wolves, including cross-fostered individuals, in order to obtain reliable estimates of inbreeding and other important genetic parameters.

Finally we note that the expanded take provisions in the 2015 10(j) rule are critical to the recovery effort. The MWEPA is a working landscape where wolves must be managed in a manner that is compatible with other resources and activities. The ability to remove wolves causing depredation on domestic livestock or unacceptable impacts on wild ungulate populations has been essential to building social license for reintroduction of wolves in this area. AZSFWC notes that proactive adaptive management and compensatory strategies have been successful, so that the increased take provisions have not resulted in the removal of any depredating wolves. Removals that have occurred for other reasons have been relatively few, with no disadvantage to wolf recovery or genetic integrity. That said, the 2015 increased take provisions could be needed in the future. Removing them will set the stage for significant adverse social and economic consequences and potentially put the entire recovery effort at risk. These provisions must be included in the final rule.

AZSFWC and our 24 Member Organizations (list attached) look forward to seeing a science based and fully informed SEIS and revised rule that allows recovery of the Mexican wolf to proceed, and does not compromise an effort in which the Service, AZGFD and other partners have invested millions of dollars and countless hours of staff time.

Thank you for the opportunity to comment on this important action.



Jim Unmacht
Executive Director

Attachments:

AZSFWC Member Organizations supporting AZGFD Analysis

AZGFD Comment letter – 6/15/20

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**AZSFWC Member Organizations Supporting AZGFD's
Scientific Analysis and Recommendations for SEIS
and Revisions to 2015 MWEPA for MX Wolf Recovery**

Anglers United
AZ Antelope Foundation
AZ Bass Federation Nation
AZ Big Game Super Raffle
AZ Bowhunters Association
AZ Chapter National Wild Turkey Federation
AZ Chapter Safari Club International
AZ Deer Association
AZ Desert Bighorn Sheep Society
AZ Elk Society
AZ Houndsmen's Association
AZ Outdoor Adventures
AZ Outdoor Sports
AZ Predator Callers
Christian Hunters of America
Kahuna's Kids
Mohave Sportsman Club
Outdoor Experience 4 All
Southwest Wildlife Foundation
SRT Outdoors
The BASS Federation
Valley of the Sun Quail Forever
Yuma Valley Rod & Gun Club
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