



April 12, 2023

Electronically submitted:

<https://www.regulations.gov/commenton/FWS-R6-ES-2022-0100-0791>

Public Comments Processing
Attn: FWS-R6-ES-2022-0100
U.S. Fish and Wildlife Service
MS: PRB/3W
5275 Leesburg Pike
Falls Church, VA 22041-3803

RE: Endangered and Threatened Species: Establishment of a Nonessential Experimental Population of Gray Wolf in Colorado

Arizona Sportsmen for Wildlife Conservation (AZSFWC) appreciates the opportunity to comment the proposed rule and notice of intent by the US Fish and Wildlife Service (Service) to establish a Nonessential Experimental Population (NEP) of Gray wolves in the State of Colorado.

AZSFWC is a 501c-3 organization dedicated to wildlife conservation, habitat improvement, youth recruitment and retention, as well as providing educational opportunities to outdoor enthusiasts. AZSFWC member organizations reach across the spectrum of wildlife conservation, hunting, angling, shooting sports and outdoor recreation groups across Arizona, representing over 27,000 people.

AZSFWC focuses primarily on issues within Arizona; however, this particular action by the Service could have enormous implications for Colorado's neighboring states to the south and west. It is essential that state wildlife agencies and stakeholders across this area are fully involved in the process and their concerns are addressed.

AZSFWC has several concerns with respect to this proposed rule:

1. Mexican wolf recovery and conservation efforts must not be adversely impacted by the establishment of a NEP of Gray wolves in Colorado,
2. The Service must ensure that the genetic integrity of the Mexican wolf is preserved, and outline a specific plan for removal of any Gray wolves that disperse outside of the 10(j) area, notably that Arizona is outside the historical range of Gray wolves,
3. The Service must ensure "de-facto" establishment of Gray wolves in Arizona does not occur in a manner that circumvents the public process and appropriate analysis by state and federal wildlife managers,

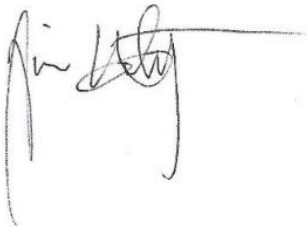
AZSFWC comments on Nonessential Experimental Population Proposal for Gray wolves in CO - 4-12-23

4. The Service should identify all the tools and response protocols within their statutory purview and 10(j) rules to ensure that any Gray wolves that leave the Colorado 10(j) area, regardless of origin, are immediately captured and returned to that 10(j) area,
5. Finally, the Service should ensure they are adequately staffed and funded, in conjunction with the state of Colorado, so any costs associated with the management of Gray wolves dispersing outside the 10(j) area, and possibly into Arizona, are not the burden and responsibility of the Arizona Game and Fish Department.

AZSFWC is on record supporting recovery of the Mexican wolf within its historic range, an effort that represents tens of millions of dollars and decades of effort by state wildlife agencies, the Service, the government of Mexico, and numerous stakeholders. The dispersal of larger, behaviorally dominant Gray wolves into Arizona, and the inevitable genetic mixing, poses an unacceptable, existential threat to the Mexican wolf. It also poses a potential negative impact on ungulate populations in the state.

We have shared this concern with the Service on multiple occasions, most recently in our comments on proposed modifications to the 10(j) rule that would relax criteria for species' introduction outside historical range, and previously in our comments on the 10(j) rule covering the Mexican wolf, the Mexican wolf Recovery Plan, and listing proposals for the Gray wolf. It is essential that the Service follow the best available science guiding Mexican wolf recovery and not compromise recovery of that unique taxonomic entity by allowing intermixing with Gray wolves.

AZSFWC and 26 of our member organizations listed below thank you for considering our input and 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



AZSFWC Organizations Supporting 10(j) Comments for Gray Wolves in Colorado

Anglers United
AZ Antelope Foundation
AZ Bass Nation
AZ Big Game Super Raffle
AZ Chapter of Backcountry Hunters & Anglers
AZ Chapter of 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
Ben Avery Clay Busters
Diablo Trust
Mogollon Sporting Association
No Excuse Hunting
Outdoor Experience 4 All
Southern AZ Quail Forever
Southwest Wildlife Foundation
SRT Outdoors
The Bass Federation of AZ
Valley of the Sun Quail Forever
Yuma Valley Rod and Gun Club