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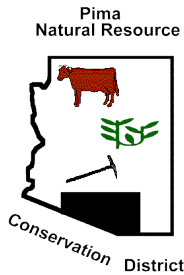
Endangered and Threatened Species: Revision to the Nonessential Experimental Population of the Mexican Wolf (/document/FWS-R2-ES-2021-0103-0001)

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Comment Tracking Number



Pima Natural Resource Conservation District
Pima Center for Conservation Education, Inc.
3241 N. Romero Road
Tucson, AZ 85705



Thursday, January 27, 2022

Processing Attn: FWS-R2- ES-2021-0103-0001
U.S. Fish and Wildlife Service
MS: PRB/PERMA (JAO/1N)
5275 Leesburg Pike, Falls Church, VA 22041-3803

RE: Endangered and Threatened Species: Revision to the Nonessential Experimental Population of the Mexican Wolf (Canis lupus baileyi) ; Docket FWS-R2-ES-2021-0103-0001

Ladies and Gentlemen,

The following comments are submitted on behalf of the Pima Natural Resource Conservation District and the Pima Center for Conservation Education, Inc. (District). We incorporate into these comments, by reference, all our previous comment submissions regarding the Mexican Wolf (Wolf).

ABOUT THE PIMA NATURAL RESOURCE CONSERVATION DISTRICT

The Pima Natural Resource Conservation District is one of 32 NRCs in Arizona. The Districts are all established under the Arizona Revised Statutes (A.R.S.) Title 37, Chapter 6. Each District is an independent local unit of Arizona government, with elected leadership, and is recognized in statute as having special expertise in soil and water conservation. The Districts are organized under the Arizona Natural Resources Commissioner.

The mission of the District therefore aligns with the statutory mission of the Arizona Natural Resources Commissioner:

“To provide for restoration and conservation of lands and soil resources, preservation of water rights, control and prevention of soil erosion, and thereby conserve natural resources, conserve wildlife, protect the tax base, protect private, state and federal lands, protect and restore the state’s rivers, streams and associated riparian habitats including livestock, fish and wildlife dependent on those habitats, in such manner to protect and promote public health, public safety, and the general public welfare.” (A.R.S.)

§37-1001)

Each District is managed by, and serves, voluntary cooperators who reside within the geographic boundaries of their respective NRCD. An NRCD cooperator is any person who has entered into a voluntary cooperative agreement with their NRCD for the purpose of protecting, conserving and practicing wise use of the natural resources under his or her control.

In carrying out our statutory mission, the Pima NRCD (District) is closely aligned with, and recently signed a Memorandum of Understanding with the USDA Natural Resources Conservation Service (NRCS). Many of our cooperators have contractual agreements with NRCS under the EQIP or other USDA grant programs. At present, the District's home office resides within the USDA Plant Materials Center building in Tucson, Arizona.

NON-ESSENTIAL DESIGNATION

The Mexican Wolf population in Arizona and New Mexico is, and should continue to be, classified as non-essential. Given the number of wolves in captive facilities it is not likely the Mexican wolf is in any danger of going extinct. In addition, the existing take provisions are entirely consistent with achieving and promoting recovery of the Wolf.

GENETIC VIABILITY

It is fact that there was a small number of founding Mexican Wolf members. Regardless of careful cross breeding of captive wolves and selective cross fostering with wild packs the Wolves are subject to in-breeding.

DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS)

The purpose described in Congressional intent for creating the ESA 10(j) statute was to make an introduction of a species into unoccupied habitat more palatable for impacted people and communities. The Mexican wolf program has proven to create an on-going sacrifice for residents, school kids, ranchers, hunters, recreationists, private property owners and communities. Management rules for the Mexican Wolf have become so complex that actual management of the population has become detrimental to the aforementioned people.

It is not wolves that the FWS seeks to manage; it is humans the FWS wants to manage and control. The 2021 DEIS has failed to disclose levels of social, cultural or economic impacts nor provide for sufficient mitigation for those impacts. It is clear that Wolf management actions by the Forest Service on historic livestock allotments have resulted in prohibiting movement of cattle onto pastures due to denning activity. Most egregiously, the Forest Service has cut permitted cattle numbers, the very factor that most damages sustainable historic economic production, on behalf of the Wolves.

Not only will the 2021 DEIS impact ranching operations, but it will also impact tourism and hunting opportunities due to increased ranch allotment closures and reduced access for the public when beef-producing families suffer damages that threaten their multi-generation economic and cultural survival.

POPULATION OBJECTIVE

The 2015 rule called for a population objective of 300 to 325 Mexican wolves in Arizona and New Mexico (half of 320 in each State). In the 2021 proposed update at (k)(9)(iii) the population objective is, “Based on end-of-year counts, we will manage to achieve and sustain a population average greater than or equal to 320 wolves in Arizona and New Mexico.” (“Greater than” is any number on a number line extending into infinity). It is objectionable and unfair to increase the 2015 goal and thereby create even greater survival threats to the culture and economy of historic ranching communities. The FWS maximum numbers of Wolves needed for re-establishment was identified in 2015. The proposed open-ended (!) increase is an additional blow to the affected communities and families.

ECONOMIC AND SOCIAL COSTS

The final EIS needs to provide full disclosure of the real costs of wolf introduction to ranchers, hunters, other local businesses and entire communities harmed together with full mitigation and compensation.

DEPREDATION AND MITIGATION

The Wolf population has already reached numbers beyond what the native, non-livestock prey base can support. As wolf numbers have increased, livestock and wild ungulate depredations have grown exponentially. Livestock depredations will continue to increase as wolf numbers increase and wild ungulates, particularly elk populations, will suffer additional losses.

It is impossible for producers, virtually all of whose ranches are on extensive rugged, mountainous terrain, to find every depredation event. Analysis of producers’ testimony in current Wolf areas indicates a statistical probability that, for every depredation found, ten were unaccounted for. In mountainous regions, heavy brush areas and timber-covered terrain, a minimal amount of carcass is left after Wolf depredation due to the length of time since depredation and the fact that predators and carrion-eaters may fully consume the kill.

Mitigation measures need full funding to **truly** compensate ranching operations for the additional operating costs imposed by wolf introduction. Wolf losses include lower conception due to stress on livestock herds requiring cattle and ranch workers to be constantly on the alert and frequently moving. Additionally, a more realistic and economically-substantiated system needs to be identified for reimbursing producers for confirmed and unconfirmed depredations. In addition, compensation measures are needed to replace lost tax revenues to state and local governments. Furthermore, since much labor is diverted to locating and

documenting depredations, it is crucial to increase ranch management compensation for the substantial cost in time and resources.

CONCLUSION

The non-essential 10(j) Wolf Status must be retained. Maintaining a hard population cap of 320 Wolves and keeping the 2015 take provisions are also essential. Three hundred twenty “or greater” is NOT a population cap. There will be significant economic, social and cultural impacts to all affected communities and resource users should the Mexican Wolf be re-classified as essential.

The final EIS needs to provide full disclosure of the real costs of wolf introduction and depredation to ranchers, other wildlife, people and the rural communities impacted. It is objectionable that the Fish and Wildlife Service originally agreed to 100 Wolves, then moved the goal to 320 wolves and now is considering moving the goal posts again. Wolf management, with its ever-increasing societal damage, has been a heartless attack by the Fish and Wildlife Service on unique American western ranching communities and their multi-generational conservation of productive ranchlands.

Sincerely,

James K. Chilton, Jr, Chair, Pima Natural Resource Conservation District