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Public Comments Processing
Division of Policy and Directives Management
U.S. Fish and Wildlife Service
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December 13, 2013

Subject: Comment on Removing the Gray Wolf (*Canis lupus*) from the List of Endangered and Threatened Wildlife and Maintaining Protections for the Mexican Wolf (*Canis lupus baileyi*) by Listing It as Endangered

Reply to: Jim deVos, Assistant Director, Arizona Game and Fish Department, 5000 W. Carefree Highway, Phoenix, Arizona 85086

To Whom It May Concern:

I am commenting for the Arizona Game and Fish Commission and Department (Department) on the June 13, 2013 U.S. Fish and Wildlife Service (Service) proposal to remove the gray wolf from the List of Endangered and Threatened Wildlife and maintain protections for the Mexican wolf by listing it as endangered. I also incorporate by reference herein our previous comments on proposed Service actions to revise the nonessential experimental population (NEP) rule for the Mexican wolf (Docket #FWS-R2-2013-0058) and to solicit scoping comment for drafting an Environmental Impact Statement (EIS) on revision of the current Mexican wolf NEP rule (Docket #FWS-R2-ES-2013-0098).

We believe the proposed gray wolf delisting is scientifically sound and will be an asset in State and Tribal efforts to manage the gray wolf to ensure that it does not again become imperiled.

With regard to the Mexican wolf listing:

1. We support the listing of the Mexican wolf as a subspecies of the gray wolf, with unique genetics and natural history. In terms of distribution, it is widely separated geographically from all other subspecies of gray wolf. It also meets the criteria for Federal listing as endangered. However, we believe listing should be done administratively and should be accompanied by simultaneous action to retain the existing 1998 Final Rule in its present form.

2. Moreover, we do not believe the Service has demonstrated that it has fully evaluated or disclosed all reasonable alternatives to the proposed listing, and the arguments for and against each alternative. In lieu of its proposed approach, we believe the Service should be administratively “relisting” the subspecies *baileyi* as endangered, wherever it may occur in the States of Arizona (AZ) and New Mexico (NM) and in Mexico. Essentially, this would restore the endangered status conferred on the Mexican wolf when it was listed on April 28, 1976 (41 FR 17736), before it was absorbed into the gray wolf listing on March 9, 1978 (43 FR 9607). This relisting should stipulate that any wild wolf occurring in the United States outside the listing range would be considered an unlisted gray wolf. Among other alternatives, the Service should also be considering:
 - a. Listing as two Distinct Population Segments of gray wolf (i.e. respectively in AZ-NM and in Mexico), the range of which is bisected by the International Border between the United States and Mexico.
 - b. Listing as two Distinct Population Segments of Mexican wolf (i.e. respectively in AZ-NM and in Mexico), the range of which is bisected by the International Border between the United States and Mexico.

We again further note that the Service delisting/relisting and NEP rule revision proposals reference several important documents to which the public has not had access. These include a draft revised Mexican Wolf Recovery Plan, a draft Mexican Wolf Management Plan and a National Conservation Strategy for the Gray Wolf. Failure to provide the latter is particularly vexing because the State wildlife agencies of AZ, NM, Colorado and Utah participated in that process but the Service failed to resolve important concerns that were raised by those agencies. Lack of access to those documents severely limits our ability to evaluate the Service delisting/relisting proposal.

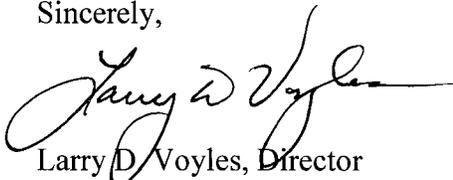
3. Regardless of which alternative it selects, we believe the Service should recognize that Mexican wolf historical range as extending from central Mexico into Arizona and New Mexico south of Interstate Highway 40.
4. The Service proposal to list the Mexican wolf is based partly on concerns about population size and genetics. A key question regarding population size is how large it must be for recovery and delisting; that question has not been resolved through recovery planning process. Lack of a clear, reasoned and achievable recovery goal is perhaps the single greatest challenge to effectively evaluating the relisting portion of the proposal. It is a major impediment to addressing concerns about population size. Clearly genetics are also relevant because of the small number of founders (7) and documented levels of inbreeding. However, the connection between inbreeding depression in a small group of captive individuals and population-level demographic consequences in the wild is not as direct as the Service suggests. It remains largely theoretical and not well supported by real-world examples directly relevant to Mexican wolf recovery. The weak connection between inbreeding depression and failed persistence in wild populations is exemplified by many examples of translocated wolves and animals of other species that are thriving despite originating from a small number of founders. The Service should not use extrapolations of inbreeding depression at the population level to justify higher numerical recovery criteria than would be necessary to recover the Mexican wolf. Further, the Service has not accurately portrayed the productivity of captive Mexican wolves vs. wild

wolves in AZ-NM, and in doing so has overstated its concerns about genetics. We address these issues in more detail in our comments on proposed Service actions to revise the nonessential experimental population (NEP) rule for the Mexican wolf (Docket #FWS-R2-2013-0058), which we have incorporated by reference above.

5. The proposed listing should be expeditiously followed by completion of the current draft revision to the 1982 Mexican Wolf Recovery Plan, so wolf conservation efforts in AZ-NM can be measured against a rangewide recovery goal or objective.

We appreciate this opportunity to comment on the proposed Service actions and look forward to participating further as appropriate and necessary to ensure that our perspectives are fully considered and reflected in the final decisions. We hope the Service will reconsider its approach, redesign it accordingly and bring an orderly and constructive end to our concerns and those expressed by countless others. We have a long history of cooperative conservation efforts working in conjunction with the Service. We believe that cooperative relationships hold the best promise for a vibrant wildlife future. We are, however, committed to all actions necessary to protect Arizona's interest in management of our wildlife resources. We do not seek litigation, but are obligated to take all measures necessary to protect Arizona's wildlife interests.

Sincerely,



Larry D. Voyles, Director
Arizona Game and Fish Department

cc: R.J. Kirkpatrick, Acting Director, New Mexico Department of Game and Fish
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