

From the desk of  
*Mireya Landin*  
P O Box 158, Williams, AZ 86046-0158

November 20, 2007

RECEIVE

NOV 26 2007

Brian Millsap, State Administrator  
US Fish and Wildlife Service  
New Mexico Ecological Services Field Office  
Attn: Mexican Gray Wolf NEPA Scoping  
2105 Osuna NE  
Albuquerque, NM 87113

U.S. NR

Dear Mr. Millsap

### MEXICAN GRAY WOLF (*LOBO*) RECOVERY

It should be superfluous and unnecessary to petition and plea for the Gray Wolf at this time in our history, culture and ecological awareness. Yet powerful interests are working hard to have the creature eradicated and bringing us back to our shameful past of medieval misconceptions.

Sadly, Mexican *lobos* are among the most endangered animals in the world despite the fact that they play an important role in restoring ecological balance to Southwest forest. Incredibly, they are routinely shot or sent back to captivity for killing livestock, or are illegally killed by poachers.

This is indefensible practice: there is plenty of public land in the Southwest where wolves could thrive rather than being confined to a ridiculously small, politically defined recovery area.

*There is one other factor to take into account: livestock and factory farming are one of the major causes of environment collapse, from ozone depletion to ocean dead zones –according to a 2006 United Nations sponsored report. Though the report has been reinforced by further studies in the past two years, it's gaining momentum with the push to track the "carbon footprints" of corporations and individuals. Can we, therefore, put livestock grazing in the balance to justify the persecution and killing of the wolf? Hardly.*

Please take these comments into consideration in your rule change process to determine the future of the Mexican gray wolves in Arizona and New Mexico.

Yours truly,

(Ms.) *Mireya Landin*

**Vicki A. Martinez**  
**15602 North 62<sup>nd</sup> Street**  
**Scottsdale, AZ 85254**

November 21, 2007

Mr. Brian Millsap, State Administrator  
U.S. Fish and Wildlife Service  
New Mexico Ecological Services Field Office  
2105 Osuna NE  
Albuquerque, NM 87113

**Attention: Mexican Gray Wolf NEPA Scoping**

Dear Mr. Millsap,

It has come to my attention that there may be positive hope regarding the destiny of the Mexican Gray Wolf in Arizona and New Mexico. Please consider this letter in favor of supporting the future of these majestic animals. The future of these Mexican Gray Wolves must be protected.

I sincerely request that you consider this as an opportunity to correct the mistakes of the past (of almost complete extermination of these animals) and ensure the bright future for wolf recovery.

There is so much we don't understand about how ecosystems operate. But keeping things natural to the extent we can, is always the best bet. Putting the Mexican gray wolf back on the land was one of the best bets our society ever made. It was and is the right thing to do.

These wolves belong here!!!

The Mexican wolves need all the help they can get to combat anti-predator prejudice and violence, some of it institutionalized at the highest levels of our government - please help make a difference!

Thank you in advance for your consideration.

Sincerely,



Vicki Martinez

November 27, 2007

Brian Millsap, State Administrator  
U.S. Fish and Wildlife Service  
New Mexico Ecological Services Field Office  
2105 Osuna NE  
Albuquerque, NM 87113

Dear Brian:

Please understand that the citizens of New Mexico and Arizona want the Lobo to stay and make a full recovery. While reintroduced wolves have thrived in the Northern Rockies - now numbering over 1,500 - the Mexican gray wolf population remains dangerously low, with only about 60 wolves in an area twice the size of Yellowstone. The difference is in the rules governing the program. Because of these rules, 11 wolves have been shot by the government, 20 more died inadvertently because of capture, and at least 24 have been trapped and permanently removed from the wild since the reintroduction began. Northern Rockies wolves are allowed to expand their territory. Mexican gray wolves are confined to the Blue Range Wolf Recovery Area, which includes the Gila National Forest in New Mexico and the bordering Apache National Forest in Arizona. But with good habitat outside of these areas, wolves often cross the political lines in search of new homes and prey. When they choose to live outside the boundaries, they are captured and re-located back into the Blue Range, which thwarts expansion of the population, disrupts packs, and sometimes causes serious injuries to individual wolves. Current rules do not require ranchers using public lands to remove or render inedible (as by lime, for example) the carcasses of livestock that die for a number of non-wolf related reasons like disease and starvation. Wolves are attracted to and often scavenge on these carcasses, and then begin to prey on live cattle or horses nearby. After three livestock kills in a year, the wolf is either killed or placed in captivity. The gray wolf reintroduction rule for the northern Rocky Mountains in Yellowstone National Park and central Idaho required ranchers to remove such "attractants" and specified that wolves that prey on stock near to where they were drawn by carcasses would not be "controlled." But the Mexican wolf never received this protection. Please don't let them be destroyed. Mexican gray wolves are critical to our natural environment. A healthy wolf population will keep our elk and deer herds healthy and bring balance back to our wild lands. This process is our chance to correct the mistakes of the past and ensure a bright future for wolf recovery. Please spare their lives we should all be glad we are not an animal, nobody seems to care especially for the Wolves.

Sincerely

*W. Morris*  
Wendy Morris  
219 W. Campbell Ave  
Phoenix, AZ 85013

November 24, 2007

Brian Millsap, State Administrator  
U.S. Fish and Wildlife Service  
New Mexico Ecological Services Field Office  
2105 Osuna NE  
Albuquerque, NM. 87113

RECEIVE

NOV 28 2007

Dear Mr. Millsap:

U.S. NMFS

I fully support the Center for Biological Diversity, Defenders of Wildlife, Grand Canyon Wildlands Council, Grand Canyon Wolf Recovery Project, Sierra Club-Grand Canyon Chapter, Sky Islands Alliance, and Wildlands Project in their deep conviction that wolves belong in Arizona, and deeply respect their clarion call to "Help us Save the Wolf!"

I'm aware that the Fish and Wildlife Service is holding a series of important public scoping open houses as part of a rule change process that will determine the future of Mexican gray wolves in Arizona and New Mexico.

This process is our chance to correct the mistakes of the past, and ensure a bright future for wolf recovery. I strongly urge you NOT to let the vehement demands of self-serving, profit-driven hunters and ranchers to influence your decision on behalf of the wolves by ruthlessly stacking the deck against these besieged, much maligned and misunderstood animals. Wolves are an integral part of the delicate balance of nature, and they deserve to survive in the wild.

I strongly urge you to live up to your name by protectively serving the needs of the animals for which your agency was originally created and established. We have the ability to save and preserve this magnificent and unique wolf species. We must not allow them to go the tragic way of so many extinct species.

Sincerely,  
*Donna Worthington*  
Donna Worthington  
1413 N. 72nd St.  
Mesa, AZ. 85207

Attn: Mexican Gray Wolf NEPA Scoping

November 28, 2007  
Brian Millsap, State Administrator of  
U.S. Fish and Wildlife Services  
New Mexico Ecological Services Field Office  
2105 Osuna NE  
Albuquerque, N M  
87113

RECEIVED  
NOV 28 2007  
FWS-NMFC

Subject: Mexican Gray Wolf  
Shooting Park at Munds Park Arizona

Sir:

To make myself clear I'm recommending YES YES YES for the introduction of the Gray Wolf in Arizona and New Mexico. The wolf will balance the eco system as it has successfully done in Yellow Stone Park. Ranchers are important but should not rule the Public land that they use. It belongs to all of us.

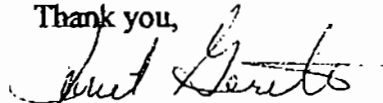
Again to be clear about the Shooting Park recommended at the Munds Park sight, NO NO, NO. I have lived there in the summers since 1983 and the reasons you do not want to build a shooting park are numerous.

1. Noise: regardless of what the shooters say it will be heard. I live at the furthest point in the park from the freeway (I 17) and I can still hear the cars. I will definitely hear fire arms.
2. Fires: regardless of what you say, want or do the shooting park will bring many more people to Cocinino Forest. This will dramatically increase an already frugal forest with the potential for fires.
3. Wildlife: There is a large wild turkey area exactly where you plan on building a park. This fall I saw an increase in elk herds due to the fire at Mormon Lake. The shooting park will only disrupt the wild life more. Has any one completed an impact study showing the effects of a shooting park in the area?

There are other considerations such as lead poisoning to the ground, the ability of the infrastructure in the area to accommodate the large volume of people.

Please consider the wishes of the residents. This is our home.

Thank you,



Janet Geretti  
7575 E Pasaro Drive  
Scottsdale, Arizona 85266  
jgeretti@gmail.com

✓  
December 6, 2007

John Slown  
U.S. Fish and Wildlife Service  
New Mexico Ecological Services Field Office  
2105 Osuna NE  
Albuquerque, NM 87113

Dear Mr. Slown:

As part of any rule change process involved in determining the future of Mexican gray wolves in AZ and NM, the U.S. Fish and Wildlife Service needs to keep in mind the one basic fact that every form of life on this planet has its place or it wouldn't be here. Natural selection marks species for extinction when they no longer have a niche. Humankind is but one strand in the web of life and does not have the knowledge or the right to destroy at will simply because we've failed to discern how to co-exist in harmony with nature's other creatures.

The Mexican gray wolf has just as much a right to live freely in this world as does mankind. As the supposedly "most intelligent" species, we should strive to become more adept at adjusting our way of life to fit into the patterns and components of nature rather than struggling and fighting against them. Attempting to eradicate elements we do not appreciate not only shows a great deal of ignorance and arrogance but has far-reaching effects that no one can accurately predict. We must respect the balance of nature and work with it, not against it, or we may find ourselves being singled out for extinction. It's a pack of wolves here, a species of owl there, a swamp, meadow or rainforest somewhere else, and little by little we change the environment that supported us so well for so long into one that can no longer sustain human life. Since we are not wise enough to accurately see the big picture, we must tend to the smaller details of respecting and nurturing all forms of life, understanding that nature will remove them when they no longer have a purpose to serve.

Finally, in the words of Mahatma Gandhi, "The greatness of a nation and its moral progress can be judged by the way its animals are treated." Persecuting and/or eradicating any animal species is beneath the dignity, intelligence and fortitude of the human race. Surely we are compassionate enough and smart enough to figure out how to live in harmony with wolves—or aren't we? I say we are. What do you say?

Sincerely yours,



Deborah Bird  
1284 N. 16<sup>th</sup> Ave.  
Show Low, AZ 85901

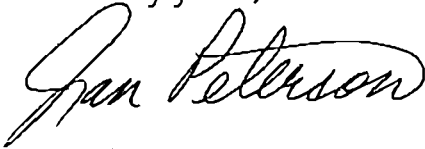
✓  
925 West 11<sup>th</sup> Place  
Mesa, AZ 85201-3117  
December 14, 2007

Brian Millsap, State Administrator  
U.S. Fish and Wildlife Service  
New Mexico Ecological Services Field Office  
2105 Osuna NE  
Albuquerque, NM 87113

Attn: Mexican Gray Wolf NEPA Scoping

I am writing on behalf of a specie that cannot speak for itself: the Mexican wolf. Your Standard Operating Procedure 13.0 is negatively impacting these wild and reintroduced Mexican gray wolves. Your "three strikes and out" rule is being arbitrarily applied and is resulting in biological instability and targeting wolves NOT guilty of depredations. The first wolf to be caught in an area where a "permanent removal" order has been issued is going to die, even if it doesn't belong to the pack that has the order issued for it. Why? This is being done to appease local ranchers. These wolves are endangered and need more protection than you are giving them. They are disappearing due to human causes. The wolves, not cattle, are endangered. Do you want wolves to be extinct? I believe extinction is the goal of the trigger-happy ranchers. Don't give them that power.

Sincerely yours,



(Mrs.) Jan Peterson

cc

✓  
To: Brian Millsap, State Administrator  
US Fish and Wildlife Service  
2105 Osuna NE  
Albuquerque, NM 87113  
R2fwe\_al@fws.gov

Attn: Mexican Gray Wolf Scoping

December 13, 2007

Dear Mr. Millsap,

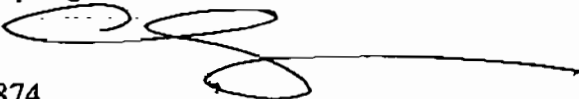
I am a strong ideological, financial and vocal supporter for reintroduction of the Mexican Wolf back into the wild. As an informed citizen, I have for years supported smart management of wildlife—which includes reintroduction of apex species like the Mexican Wolf into their rightful place in nature. I see that the world is waking up to the short-sighted actions that humans seem to keep inflicting on nature. The results? Devastating wildfires, decline of pollinator species, run-away carbon emissions and other global catastrophes.

Don't let short-sighted policy on how we co-exist with other living species create more natural disasters. I am aware of the relationship between apex species and all the subordinate species in their domain. Living on a wild-life corridor, I do my part by running all electricity off solar and wind and by conserving other resources. I would welcome reintroduction of the Mexican Wolf onto my own land in a heart beat as the natural wonders of the world cannot be even closely approached by human hand.

However, human hands CAN bring back species whose existence is threatened or endangered. I strongly support responsive and responsible reintroduction of wolf species throughout America. Don't let the frightened, greedy few run the show: commit your resources without hesitation today to bring back our natural allies—including the Mexican Wolf.

Sincerely,

Cari L Spring, Ph.D



POB 8874  
Catalina, AZ 85738  
520.260.9713



December 12, 2007

Mr. Brian Millsap, State Administrator  
U.S. Fish and Wildlife Service  
New Mexico Ecological Services Field Office  
2105 Osuna NE  
Albuquerque, NM 87113

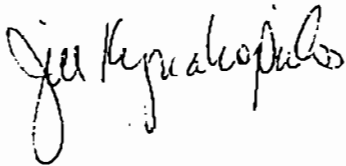
Dear Mr. Millsap,

I am writing to ask the U.S. Fish and Wildlife Service to give the Mexican gray wolf a chance to thrive here in Arizona and in the surrounding areas. The Mexican gray wolf is an important part of our ecology and environmental structure and deserves the right to survive in our state.

As a wildlife lover, I am very happy about the reintroduction of the wolves in Yellowstone National Park. The wolves have proved to be an important predator keeping with the natural cycle of wildlife in Yellowstone National Park. Special effort was put into effect in this part of our country and I believe a similar program can also work to help the Mexican gray wolf. I would like to ask for rule changes that are in progress to help determine a positive future for the Mexican gray wolf. This process is our chance to correct the mistakes of the past and ensure a bright future for wolf recovery.

Thank you for considering my comments on this matter.

Jill Kyriakopoulos  
150 Palo Verde Circle  
Sedona, AZ 86351  
(928) 284-4605  
jillkvvs@yahoo.com



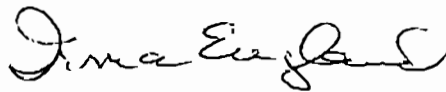
December 10, 2007

Brian Millsap  
State Administrator  
U.S. Fish & Wildlife Service  
New Mexico Ecological Services  
Field Office  
2105 Osuna NE  
Albuquerque, NM 87113

Dear Mr. Millsap;

I am writing this letter in behalf of the Mexican Wolf and its future in New Mexico and Arizona. I am a staunch supporter of having the wolves in both states. They are a natural predator and a native of both states. Please let's correct the mistakes of the past in allowing the annihilation of these animals by making sure that they will be allowed to inhabit both states. I appreciate you allowing my voice to be heard and by taking into consideration the recovery of the wolves in the southwest. I am a native of Arizona and feel that I should have a voice in this matter. Thank you.

Sincerely,

A handwritten signature in cursive script that reads "Irma England".

Irma England  
1601 Quail Ridge Cr.  
Kingman, AZ 86401

11/28/07

John Slown  
U.S. Fish and Wildlife Service  
New Mexico Ecological Services Field Office  
2105 Osuna NE  
Albuquerque, NM 87113

Dear Mr. Slown,

I am contacting you as I am very concerned at the dwindling number of Mexican Gray Wolves. I am hoping and feel that it is very important for the Fish and Wildlife Dept. to fulfill its mandate under ESA to recover Mexican Gray Wolves. I feel the focus needs not to be on wolf control but rather wolf survival in the wild. Changing the designation of these wolves from "experimental, non-essential" to "experimental, essential or endangered" would seem like a logical and helpful designation.

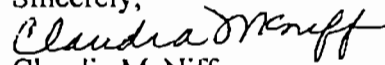
I understand that the Recovery Plan has not been revised for many years, but feel that it is important not to revise this plan until it is well understood what constitutes true recovery of these wolves.

I also would like to see the territory of wolves expanded to outside of the limits of the BRWRA and that further there should be a reduced "take" of wolves, in general.

In short, I feel that wolves are an important part of the ecosystem and more than that, are a beautiful representation of life in the wild. They are part of our heritage and part of the great outdoors: something that should be protected and valued.

I hope you will support whatever plans there are or will help create and/or revise plans, to help the Mexican Gray Wolves truly recover. We are losing wild America at an alarming rate. Let's not make these wolves the next victim of our shortsightedness.

Thanks for your consideration.

Sincerely,  
  
Claudia McNiff  
1623 E. Candlestick Dr.  
Tempe, AZ 85283

✓  
/

Brian Millsap, State Administrator  
U.S. Fish and Wildlife Service  
New Mexico Ecological Services Field Office  
2105 Osuna NE  
Albuquerque, NM 87113

Attention: Mexican Gray Wolf  
NEPA Scoping -

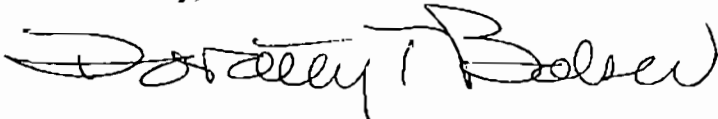
Dear Sirs:

As you well know, our wild predators play an important role in controlling the other wild species.

Please explore ALL avenues to allow natural species to co-exist with domestic animals.

I realize this is a difficult question but one that deserves careful decisions that don't wipe out species.

Sincerely,



Dorothy T. Baker.

November 26, 2007  
190 Wildwood Drive  
Prescott, AZ., 86405

November 24, 2007

Brian Millsap, State Administrator  
U.S. Fish and Wildlife Service  
New Mexico Ecological Services Field Office  
2105 Osuna NE  
Albuquerque, NM. 87113

CEIVE

NOV 28 2007

Dear Mr. Millsap:

U.S.-NMEC

I fully support the Center for Biological Diversity, Defenders of Wildlife, Grand Canyon Wildlands Council, Grand Canyon Wolf Recovery Project, Sierra Club-Grand Canyon Chapter, Sky Islands Alliance, and Wildlands Project in their deep conviction that wolves belong in Arizona, and deeply respect their clarion call to "Help us Save the Wolf!"

I'm aware that the Fish and Wildlife Service is holding a series of important public scoping open houses as part of a rule change process that will determine the future of Mexican gray wolves in Arizona and New Mexico.

This process is our chance to correct the mistakes of the past, and ensure a bright future for wolf recovery. I strongly urge you NOT to let the vehement demands of self-serving, profit-driven hunters and ranchers to influence your decision on behalf of the wolves by ruthlessly stacking the deck against these besieged, much maligned and misunderstood animals. Wolves are an integral part of the delicate balance of nature, and they deserve to survive in the wild.

I strongly urge you to live up to your name by protectively serving the needs of the animals for which your agency was originally created and established. We have the ability to save and preserve this magnificent and unique wolf species. We must not allow them to go the tragic way of so many extinct species.

Sincerely  
*Donna Worthington*  
Donna Worthington  
1413 N. 72nd St.  
Mesa, AZ. 85207

Attn: Mexican Gray Wolf NEPA Scoping

RECEIVED

DEC 26 2007

December 21, 2007

USFWS-NMESFO

Brian Millsap, State Administrator  
U.S. Fish and Wildlife Service  
New Mexico Ecological Services Field Office  
2105 Osuna NE  
Albuquerque, NM 87113

As I recall, the reasoning for the Mexican Gray Wolf recovery program was to establish a viable wolf population in the Southwest. And of course, the obvious objective was to prevent their extinction as well as to eventually re-establish their presence as a vital and important predator in the natural setting of our area.

The primary reason that more progress has not been achieved is the livestock interests conflict with this recovery effort. There are others that express concern about predation of game animals, such as deer and elk.

The vast majority of the wolf recovery area is on public lands that belong to all of us not just some of us. At the same time we can't ignore that cattle are using the same area. Wolves are native to these lands just as surely as elk, coyotes, deer, lions, bear, and bunny rabbits---they are supposed to be here!

In order to achieve the original objectives of this program stronger recovery measures are needed. Fortunately for those of us that like to eat beef, cattle are not on the verge of extinction---but wolves are, and we need to make certain that doesn't occur. What is needed is a conservation alternative that changes the classification for these wolves from "experimental, non-essential" to "endangered" because these wolves are already listed as "endangered" under the Endangered Species Act---the desired result is not being achieved with the present rules.


It is unreasonable to expect wolves to not disperse into surrounding areas anymore than we would or could restrict movement of any wild creature. Rule changes that allow new releases throughout the Blue Range Wolf Recovery Area(BRWRA) should be put into effect as soon as practicable. In the revised rule, there should be no exclusion of geographical areas from potential occupation by wolves.

I believe what the professional wildlife people say about the importance of the wolf to the overall health of our other wildlife and to our public lands. Recognizing there will continue to be wolf/livestock conflicts it is important to work to reduce the amount of predation but discontinue the removal or killing of wolves---we must remember, the goal is to re-establish a viable wolf population. The reintroduction objective of 100 wolves has not been accomplished---no one knows for certain how many wolves are out there. In any case a revised rule must allow no "take" of wolves. There should be no cap set on the numbers of wolves in the wild populations. The FWS needs to revise the recovery

plan before or concurrent with this rule change so that rule changes do not preclude future recovery actions. And there should be nothing in the language of the rules that would preclude future recovery options.

On the ground USDA predator control personnel must be advised appropriately and timely of all rule changes, when they occur, to prevent incidents that are detrimental to wolf population recovery.

Sincerely ,

  
Gary V. Christensen

PS: Please withhold personal information from public review.

December 15, 2007

Brian Millsap, State Administrator  
U.S. Fish and Wildlife Service  
New Mexico Ecological Services Field Office  
2105 Osuna N.E.  
Albuquerque, New Mexico 87103

Attn: Mexican Gray Wolf NEPA Scoping

Dear Mr. Millsap,

I am writing to urge the U.S. Fish and Wildlife Service to continue the Mexican Gray Wolf recovery program. Please do not be swayed by opponents of the Wolf who want the recovery program to end/fail and the Wolf to become extinct.

The recovery program has taught us about ecosystems and how they operate. The knowledge gained from studies of the Wolf may well be applicable to other endangered species. Already our generation has been associated with great numbers of species which have become extinct. Let us stop this trend and become better stewards of wildlife.

What changes in rules that occur must be for the benefit of the Wolf in Arizona and New Mexico. Keep the changes as close to natural or nature as is possible.

Thank you for your consideration of my letter. Thank you for the good work that the U.S. Fish and Wildlife Service has accomplished these many years.

Sincerely,



Jean S. Miyake, M.D.

11105 E Dale Lane  
Scottsdale, Arizona



2136 N. Rosburg Dr.  
Mesa, AZ 85215

December 17, 2007

US Fish and Wildlife Service  
New Mexico Ecological Service Field Office  
2105 Osuna NE  
Albuquerque, New Mexico 87113

Attention: Wolf Program

Gentlemen:

The Arizona Republic wrote a compelling editorial this day, explaining why the Mexican Wolf Program should continue and offering several changes that would make the Program more viable and more success oriented. I am in total accord with the content of the editorial. Among other things, they pointed out that

1. Ranchers could do more to prevent wolf depredation by removing dead cattle from the wolf recovery area or treating the carcasses with lime to make them inedible.
2. Additional acreage should be opened up to wolf habitation as the wolf population grows.
3. The Government should re-assign the wolf designation to "endangered species" (NOT the current "non-essential, experimental").

The Defenders of Wildlife is compensating ranchers for cattle killed by wolves. This top predator of the food chain should be allowed every opportunity to re-establish itself in the appropriate areas. I worked with P.A.W.s early in the 1990's to help re-introduce the Mexican Wolf to the wild and I am dismayed that progress is so slow and lethargic. Please move forward with this important effort.

Sincerely yours,



Patty A. Williams

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DEC 20 2007

USFWS-NMESFO

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DEC 20 2007

USFWS NMESFO

Stephen E. Sample  
5912 E. Tally Ho Drive  
Cave Creek, AZ 85331  
480-488-6429 Home  
480-688-7187 Mobile  
ssample@ccim.net

RECEIVED  
DEC 21 2007  
USFWS-NMESFO

December 17, 2007

Wolf Program  
U. S. Fish and Wildlife Program  
New Mexico Ecological Service Field Office  
2105 Osuna NE  
Albuquerque, NM 87133

Re: Stop Rancher Killing of the Mexican Wolves

Dear Sir,

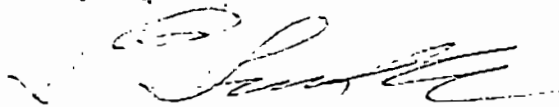
Please add my input into the public comment period regarding the re-introduction of Mexican Wolves in Arizona and the Southwest.

Continue Mexican Wolf introduction program and stop any killing of wolves by ranchers. Their cattle are very destructive of the ecosystem and those cattle should be taken off of public lands, not the wolves.

Ranchers should not be allowed to undermine the re-introduction program. They are a minority interest in the scope of things.

Wolves will help restore the health of the wild for more reasons than can be listed. The wolves were here before the cattle.

Sincerely,



Stephen E. Sample

DOMINIC J. VERDA PH.D.PH.D.  
F.I.-I.S.S. S.A. - D.C.S.S.  
9815 NORTH 96th PLACE  
SCOTTSDALE, ARIZONA \*5258 - 4701

12-17-07

DIRECTOR - WOLF PROGRAM  
U.S. FISH & WILDLIFE SERVICE  
NEW MEXICO ECOLOGICAL SERVICE FIELD OFFICE  
2105 OSUNA NE  
ALBUQUERQUE NM 87113

Dear Sir:

This is in reference to NOT reintroduce endangered Mexican gray wolves into Arizona and New Mexico!!

AS senior of a family of adults ten ( 10 ) who own or live in Arizona and also in New Mexico we are 100% against the introduction of any type of wolves back into the wild or on federal lands or parks or private lands!!

Historically, relatives that go back to the great depression times found that killing the wolves and foxes in the mid-west for State Bounty money was the only way a lot was able to provide some money to feed their starving children. The toll of animals and children to adults that were attacked by wolves back then to now days is not in any interest of the public. Being a supposed endangered animal which there is no real proof of in the world shows that your agency places the lives of animals along with historical reptiles above the lives of humans beings when any citizen tries to protect an attack by killing one with a firearm.

No animal or reptile should be placed above a human life and firearms should be allowed to be carried by any citizen to protect themselves in the wild or in populated areas; too many such cases where even coyotes, wolves, rattlesnakes and mountain lions and skunks have killed people who are trying to enjoy even just a walk in the woods or park or forest areas run by: federal, state or municipal agencies.

The place for any type of supposed endangered animal is in the " ZOO " in all states if you want to place them there; however, first as a historical investigation should be more accurate that the ZOOS as in say St. Louis have proper trained people taking care of their specific animals in certain areas. REF: 1970s African male elephant was killed because they did not let the male mate with the female when seasons was correct, second - black spitting cobra also in 1980s was killed when they tried to place it back into its cage, third just in 200s the 2 white polar bears were found dead in zoo - along in 1970s the American Grizzly Bear. None of these have ever been replaced which they should be also the black or dark color alligator in snake house died in 1980s early for not knowing how to care for it.

SINCERELY

  
DOMINIC VERDA PH.D.PH.D.



TO: US FISH AND WILDLIFE SERVICE  
ATTN: WOLF PROGRAM, NEW MEXICO  
ECOLOGICAL SERVICE FIELD OFFICE  
2105 OSUNA  
ALBUQUERQUE, NM 87113

December 18, 2007

SB: WOLF RECOVERY PROGRAM

This response is to the editorial in the Phoenix news paper. Whoever wrote the article is missing the good Things Ranchers have done for wildlife.

Ranchers in Arizona have developed many water holes across the state. If the ranchers are forced out who Will maintain, I do not thing the maintenance will be done by the National Forest Service since they seem to only have enough time to patrol the forest roads in their vehicles, the water holes used by both livestock and wildlife.

The article stated that the Wolf has developed a taste for beef due to the ranchers nor removing dead livestock. Wolves are like their cousin the Coyote who is an opportunist and will most always take the easy prey and what Could be more easy than the ranchers young calves.

The article also stated that ranchers are paid for lost livestock due to Wolf predication, this may seem simple enough, but maybe the Rancher in Montana and Idaho should be contacted concerning wolf problems and the hassle getting Paid for livestock loss due to wolfs.

I suggest that a prime time TV program should scheduled showing a Wolf kill, being catchn alive is not the most humane was to die.

Lastly, if not for the Arizona ranchers we would not have a Elk herd in Arizona for the Wolf to hunt and eat. The ranchers must be a major factor in any wildlife program to succeed and prosper.

Sam Lochr  
Hunter and Conservationist  
5324 E Emelita Ave  
Mesa, Arizona 85206



File Code: 2670

Date: December 18, 2007

John Slown, NEPA Specialist  
New Mexico Ecological Services Field Office  
US Fish and Wildlife Service  
2105 Osuna NE  
Albuquerque, NM 87113

RECEIVED

DEC 21 2007

USFWS-NMESFO

Dear Mr. Slown:

Several members of the Forest Leadership Team of the Apache-Sitgreaves National Forests and a number of Forest biologists met and discussed the various aspects of the Mexican wolf project. John Oakleaf, Field Project Coordinator, Mike Godwin, Arizona Game and Fish Department Region I, and Cathy Taylor, Forest Service AMOC representative, were present to answer questions. I am submitting this letter with our comments for the public scoping phase of the proposed preparation of an EIS to amend the project.

As managers of the Apache-Sitgreaves National Forests, we support allowing wolves to establish home ranges outside of the Blue Range Wolf Recovery. As wolves disperse to the western portion of the Forests, the western portion of the Lakeside Ranger District and most of the Black Mesa District have very low densities of people. Native prey such as elk, are quite abundant in those areas and would provide sufficient food resources. Most of the range allotments in that area are six-month allotments, reducing the exposure of the wolves to livestock and the opportunities for livestock depredation. In addition, there is a large area that is not allocated to livestock. We believe that there is good wolf habitat on the western portion of the Forests, which extends onto the Tonto and Coconino National Forests.

Another method that would facilitate wolf dispersal would be to expand the Recovery Area to a size that maximizes the chances of a successful population recovery and minimizes current movement restriction issues. An important consideration of allowing wolves to move west, is the continued participation of the White Mountain Apache Tribe in the Project.

Wolves dispersing west of the current Blue Range Recovery Area may cause more nuisance problems in the more populated areas around Pinetop-Lakeside and Show Low (PTS). Wolves will encounter more pets and stray domestic animals, interactions that will likely be detrimental for both wolves and pets. It would be critical that the White Mountain Apache Tribe (WMAT) continue to allow wolves on the Fort Apache Indian Reservation (FAIR), which would allow wolves to move to the west through the more isolated forests of the reservation. If the WMAT pulls out of the project and requires that wolves be removed from FAIR, problems in the densely populated PTS area would escalate to the point that the residents may demand the removal of



wolves in that area as well. I urge the US Fish and Wildlife Service and the Adaptive Management Oversight Committee to carefully evaluate this situation and to develop additional measures to confront potential conflicts between wolves and local residents.

Wolves are likely to follow their prey when they drop below the Rim during heavy snow years onto the Tonto National Forest, Fort Apache Indian Reservation, and the San Carlos Apache Reservation. We believe that this natural movement should be allowed to the extent possible, recognizing the opposition of the San Carlos Apache Tribe. We expect that in most cases, the wolves would return to the high country as their prey move back north when the snow melts.

In order to maximize management options, we also recommend that initial releases from captivity be allowed anywhere in the Blue Range Wolf Recovery Area. If the Recovery Area is expanded, initial releases should be allowed in new areas for specific purposes. This provision would maximize the potential for establishing new breeding pairs and maximize the potential to increase heterogeneity of the genetics of the population.

As the population expands, we would like to see additional, well-defined provisions for harassment of wolves by the public. We expect that there may be increased nuisance behavior in areas with more private land, especially around Pinetop-Lakeside and Show Low, and Heber-Overgaard. The public could then assist with negative conditioning of wolves that stray near residences, or demonstrate little fear of humans. Harassment could take the form of throwing rocks or other objects directly at the wolves, the use of rubber bullets or bean bag projectiles (after required training), or chasing wolves with vehicles. These methods could also be permitted for deterring attacks on pets, whether on private, tribal, or public lands.

An active, involved and more extensive public education program is a must. The benefits are multiple: Education enables local understanding of 1) how to prevent wolf encounter problems caused by inappropriate pet food and garbage practices and by letting pets roam freely, 2) how to live with other wildlife as well (wolf, coyote, bear, raccoon, etc.), 3) how to behave appropriately should a wolf be encountered and what actions are legal and effective, and 4), how the wolf functions in a rich and diverse ecosystem. All of these things would enhance recovery of the Mexican wolf.

Additional methods to deal with depredation and nuisance problems are needed because it has been demonstrated that the permanent removal of many animals is limiting the potential recovery of the wolves. As public land managers, we have the responsibility for multiple use of public lands, including ranching as well as threatened and endangered species recovery. We are committed to working with our permittees and the wolf reintroduction project to find mutually acceptable changes in livestock operations that would reduce the potential for wolf depredation on livestock. Some potential examples include:

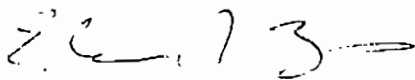
- Encourage changes in animal husbandry practices, such as confined calving or seasonal calving or other practices that would decrease depredation potential, through incentive payments or reimbursement of expenses to convert management.
- Encourage regular riding to determine herd health, remove and/or treat injured or sick livestock, and to find and treat carcasses and prevent depredation through reimbursement of added expenses for increased management.

- Consider an incentive program that would pay an upfront fee to ranchers based on the number of wolves using the allotment.
- Pay for additional fencing or other structures to protect livestock and animals not considered livestock.

We recommend that changes in livestock operations or practices such as carcass removal be considered on a case-by-case basis, when specific conditions exist. The Forests will consider such actions and will work with permittees to find the best practices for individual operations.

Thank you for this opportunity to comment on the Mexican Wolf Reintroduction Project. We look forward to our continued involvement in the recovery of the Mexican wolf.

Sincerely,



ELAINE J. ZIEROTH  
Forest Supervisor

cc: Ed Collins, Rick Davalos, Frank Hayes, Kate Klein, Jeff Rivera  
Brian Dykstra, Bob Csargo, Charlie Denton, Vicente Ordonez, James Copeland,  
Linda WhiteTrifaro, Lance Brown, Cathy A Taylor

December 18, 2007

FAX Transmission Sheet 1-505 346-2542

Re: Do not allow any killing of the Mexican Wolves

Attn: Wolf Program, U. S. Fish and Wildlife Service, New Mexico  
Ecological Service Field Office

From: Gita S Saraydarian



Continue Mexican Wolf introduction program and stop any killing of wolves by ranchers or anyone else. The cattle that they sometimes kill are very destructive of the ecosystem and those cattle should be taken off of public lands, not the wolves.

Ranchers should not be allowed to undermine the re-introduction program. Wolves will help restore the health of the wild ecosystem.

Sincerely, Gita Saraydarian

5912 E. Tully Ho Drive  
Cave Creek AZ, 85331  
480-488-6429



December 19, 2007

U S Fish & Wildlife Service,

If there wasn't room in Arizona for the wolf before 1940, there certainly isn't room now. If these liberal tree hugging environmentalists want to see & hear a wolf they should go to a zoo.

Why can't we profet from the mistakes make in the northern states?

Sincerely,

*Jack Lutch*

Jack Lutch  
1530 North Fortv  
Wickenburg, AZ 85390

**TITLA & PARSI, PLLC**  
ATTORNEYS AT LAW

**Steve M. Titla**

Admitted in:  
Arizona  
San Carlos Reservation

P.O. Box 1143  
245 South Hill Street  
Globe, AZ 85502  
Phone: (928) 425-8137  
Fax: (928) 425-9048

E-mail: [steve@titlaparsi.com](mailto:steve@titlaparsi.com)

General Counsel for the  
San Carlos Apache Tribe

Also serving the  
Phoenix Metropolitan area

December 20, 2007

John Slown  
U.S. Fish and Wildlife Service  
New Mexico Ecological  
Services Field Office  
2105 Osuna NE  
Albuquerque, NM 87113

RECEIVED  
DEC 26 2007  
USFWS-NMESFO

**RE: Comments on Proposed FWS Changes to 10J Rule for the Mexican Wolf  
Reintroduction Program; Mexican Gray Wolf NEPA Scoping**

Dear Sir:

Cattle ranching is an essential measure to the San Carlos Apache Reservation's economic health and social welfare, as well as important to San Carlos Apache culture, traditions and spiritual beliefs. The uncontrolled introduction of the Mexican wolf is causing significant harm to our people, our natural resources, and to way of life.

The San Carlos Apache Reservation is comprised of 5 cattle associations and 2 tribal herds. The 5 cattle associations consist of Apaches from the reservation. These cattle associations are the Ash Creek Cattle Association, the Anchor Seven Cattle Association, Point of Pines Cattle Association, the Tonto Livestock Association and the Slaughter Mountain Cattle Association. The San Carlos Apache Tribe has 2 tribal herds and they are the IDT cattle and the R100 Tribal Herd. All these cattle associations cover the entire area of the San Carlos Apache Reservation. Many Apaches are members of these associations and are prideful of their ownership of horses and cattle. Sale of cattle is very important to individual Apaches, as the reservation exists in the midst of poverty.

Depredation of cattle by wolves thus greatly injures the financial well being of Apache tribal members. Expansion of the wolf range and program will most certainly hurt Apache cattle interests because wolves will have more chances to enter the Apache reservation from more areas.

The San Carlos Apache Tribe has also spent over a million dollars revitalizing its tribal cattle and horse herd. At one time the Tribe had a large herd and derived a tremendous amount of income that contributed to the well being of Apache people. The Tribe is now attempting to revitalize its horse and cattle program with a large investment. Initial signs show that the process is working and the project is well on the way to becoming a successful operation by improving our base herds. Depredation by wolves of this large tribal investment would substantially hurt the Tribe financially.

The livestock industry on the reservation does not only provide an economic benefit but, more importantly, it helps provide a social health and cultural benefit to the Apache Tribe. The livestock industry composed of Apache horses and cattle reaches a long way back in the history of the Apache people. Apaches were horse people before the era of reservations. Once Apaches were put on reservations, cattle were introduced and Apaches became successful cattle ranchers. Apaches today would be the grandchildren or great grandchildren of these early cattle ranchers. In other words, the grandparents or great-grandparents of today's Apaches started and successfully worked cattle on the reservation. Horses and cattle thus became embedded in the culture and tradition of the Apache Tribe. Apaches are proud to be associated with cattle and horse ownership; and the depredation of wolves on Apache livestock causes harm to the culture and tradition. This is priceless.

On the other hand, wolves are not part of the culture and tradition of Apaches. In fact, the San Carlos Apache Tribe has decided by motion and then by resolution that wolves are to be removed immediately from the reservation upon sight by the Fish and Wildlife Services. The response by Fish and Wildlife Services has not been adequate and needs to be greatly improved. Because of this lack of timely response and consideration or compliance to Tribal laws, it is costing the Tribe substantially not only in lost revenues from our livestock losses but also losses to our wildlife in income as well as adversely impacting our Tribal wildlife management program.

There is a concern regarding the lack of federal or state agency response to tribal concerns of wolves being seen on the reservation. Flight data is not provided despite the fact that regular over flights are made by Federal agency personnel. If Apaches report wolf sightings to the Fish and Wildlife Service, there is a lack of response by any of the agencies in charge of wolf management.

There is also a lack of response to or interest in the need to build infrastructure in the area so that cattle association and tribal personnel can monitor and report wolf sightings to prevent depredations. Effective, timely and responsive support would result in decreased wolf depredation and improved herd management and compliance with Tribal policy regarding no wolves.

There is also lack of response to monitor wolf activity. These wolf agencies do not keep the San Carlos Apaches aware of wolf movements, locations, predation, and updates about "problem" wolves, wolves that are habituated and could be a danger to our children. San Carlos Apaches expect early, real time notice of wolves that are close to the reservation boundaries. A "buffer zone" zone of several miles would help the Tribe.

There is a critical need to maintain the deer and elk herds on the San Carlos Apache Reservation as tribal members traditionally and culturally hunt deer on the reservation. The Tribe also has a thriving Recreation and Wildlife Program that provides hunting opportunities to non-members and raises needed income for the Tribe. There have been reports of the impact of wolf sightings on the reservation by tribal members and the problems of habituated wolves on the reservation that interfere with Apaches in their annual and traditional hunting areas. One Apache Family has in fact abandoned traditional hunting areas because of habituated wolf activities.

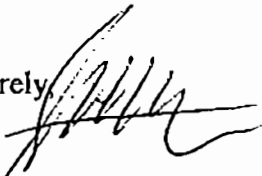
A way to reduce wolves coming on the reservation would be to create a "buffer zone" between the San Carlos Apache Reservation and the wolf program area. This "buffer zone" should be about 5 to 10 miles along the border so those wolves would be prevented from crossing over into the reservation. Any wolf sited or located in the buffer zone would be immediately removed. Fish and Wildlife Services would thus monitor closely these "buffer zone" areas to respect tribal boundaries and Tribal policy.

The Apache Tribe's sovereign governmental powers to make these decisions about the health, safety and welfare of its people should be respected by the Fish and Wildlife Service. The Tribe has the sovereign authority to manage its own wildlife in the best interest of Apaches.

The Tribe's decision to remove wolves from the reservation by agency personnel should be respected by an adequate appropriation of funds to the tribe for monitoring activities. Currently, the tribe has to react to federal policy without adequate funds to address the federally created problem. The expansion of the 10J area would certainly hurt the tribe financially and culturally.

In summary, we ask that the decision of the San Carlos Apache Tribal Council to remove all wolves from the reservation when they are discovered on the reservation be respected, and that the expansion under 10J not be instituted by the agency. Finally, a buffer zone should be established around the reservation by the Fish Wildlife Service to prevent wolves from entering the reservation.

Sincerely,



Steve M. Titla  
Attorney at Law

Cc: Chairman Wendsler Nosie, San Carlos Apache Tribe  
Vice-Chairman David Reede, San Carlos Apache Tribe  
San Carlos Apache Tribal Council  
All Board of Directors, Apache Cattle Associations  
Board of Directors, Point of Pines Cattle Association  
Senator John McCain  
Congressman Rick Renzi

Larry Messina  
P.O.Box 1856  
Pinetop, Arizona 85935  
928-368-4192

U.S.Fish and Wildlife Service  
Attn: Wolf Program  
2105 Osuna NE  
Albuquerque, NM 87113

Dear Project Coordinator,

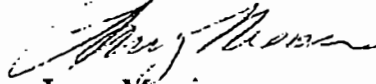
As a native of Arizona and a resident of the affected area I would like to comment on the Mexican wolf re-introduction program. When the area was initially settled by Europeans it made perfect sense for those few settlers to take advantage of the abundant forage to feed their personal herds of livestock. Of course the impact to the environment was minimal and localized. As the population grew the need to feed those in the surrounding area would have naturally dictated growing those herds and controlling predation. The impact to the ecosystem would have increased also. At some point in time during this period the Homestead Act came into being, and those pioneers had ample opportunity to legally secure their holdings. Many chose not to instead taking advantage of bargain basement leases to provide for their livestock. Then at the end of the nineteenth century the railroad provided easy access to the Midwestern feed lots and the importance of the Western cattle industry diminished greatly; although the industry continued to flourish.

It has been my experience as a businessman that in order to have a viable business one needs to secure a location from which to conduct that business. Whether this property is purchased or leased it has to be figured in as a cost of doing business. I know of very few endeavors where those incurred costs are not at fair market value. Also the business and its assets need to be secured. Security could come from something as simple as a lock on the door but assets need to be protected. In the livestock industry one would think a good sturdy predator proof fence would be priority one. The livestock industry in the Southwest has instead relied on the federal government and tax payers to subsidize their efforts by obtaining leases at a fraction of market value. They are also compensated for diminished grazing capacity caused by the very product they are marketing. Gates providing access to federal lands are routinely closed and locked illegally and ranchers expect the public to pay for predation by native species.

In summary the re-introduction of any and all native species should be welcomed with open arms. There was a time when subsistence farming/ranching made sense. That

time has been gone for at least five or six decades. If an individual wants to grow and market livestock; buy some land, put up a fence and have at it. Unfortunately the image of the Southwestern rancher has gone from pioneering entrepreneur to the world's most highly romanticized welfare recipient. If an industry can't return a profit without being heavily subsidized, it should die on the vine. Please, continue and hopefully expand the wolf project.

Sincerely,

A handwritten signature in cursive script, appearing to read "Larry Messina".

Larry Messina  
Pinetop, Arizona

# FAX

DATE: 12-20 07

FAX: 505-346-2542

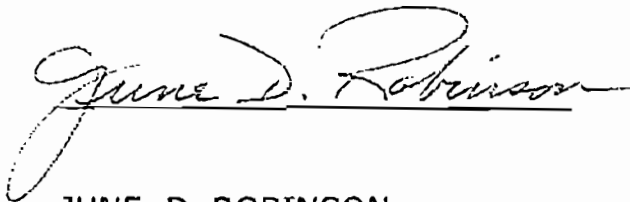
TO: U. S. FISH & WILDLIFE SERVICE

ATTN: WOLF PROGRAM

FROM: JUNE ROBINSON

RE: RECOVERY

SAVE THE WOLVES. PERIOD.

A handwritten signature in cursive script that reads "June D. Robinson". The signature is written in black ink and is positioned above the printed name.

JUNE D ROBINSON

8427 W GLENDALE AVE

GLENDALE AZ 85305

Bettina Bickel  
9218 N. 51<sup>st</sup> Dr.  
Glendale, AZ 85302

December 23, 2007

Attn: Mexican Gray Wolf NEPA Scoping  
John Slown  
U.S. Fish and Wildlife Service  
New Mexico Ecological Services Field Office  
2105 Osuna NE  
Albuquerque, NM 87113

RECEIVED  
DEC 26 2007  
USFWS-NMESFO

Dear Mr. Slown,

I have had the thrilling experience of hearing wolves howling in eastern Arizona, and I thank the USFWS for its efforts to recover the Mexican gray wolf. However, I strongly believe that changes are needed to the recovery effort, so please accept the following comments on the Mexican gray wolf EIS scoping process:

I value Arizona's wildlife and healthy ecosystems, and strongly support the recovery of Mexican gray wolves to ecologically effective population levels. As you know, wolves are a highly interactive species, affecting the abundance, distribution, and behavior of other species in the ecosystem. Their influence on the behavior of elk helps to restore the riparian areas which are critical to many other species of birds and wildlife. Wolves may help to balance other predators such as coyotes, and they affect the ecosystem in many ways which are vital in promoting biodiversity and long-term sustainability.

The wolves have shown that they are capable of hunting prey, forming packs, and raising pups. Unfortunately, political constraints which give ranchers priority over successful recovery of this magnificent and critically endangered species have prevented the recovery of a sustainable and ecologically effective population of wolves. The failure to successfully recover wolves is solely due to excessive removal of wolves by capture and killing due to livestock conflicts and the arbitrary boundary. With the ultimate goal of **stopping the removal and killing of wolves**, the following changes should be made to the program:

**Include a Conservation Alternative that will change the classification to "experimental, essential" or "endangered". The current "experimental, nonessential" classification is not resulting in successful recovery.** This is the only wild population of Mexican gray wolves and it is absolutely essential to the long-term recovery of the species. Changing the classification would result in prioritization of wolf recovery by cooperative agencies such as the Forest Service.



**Eliminate all restrictions to wolf dispersal and movements.** There is absolutely no biological or scientific rationale for the current boundary or the current rule that requires the capture of wolves that disperse outside the arbitrary boundary. This rule has resulted in wolf injuries and deaths and disruption of pack relationships, and prevented wolves from naturally dispersing to high quality habitat outside the artificial boundary. It also wastes the valuable time of the Field Team who must trap these wolves. Wolves should be allowed to disperse naturally to good habitat, including the Grand Canyon Ecoregion.

**Expand the area for initial releases to anywhere within the Blue Range Recovery Area.** This would allow biologists to release wolves based on considerations such as existing pack territories and to introduce or maintain genetic variability.

**Resolve wolf-livestock conflicts in ways that keep wolves in the wild and achieve progress towards reintroduction objectives.** Conflicts with livestock are the main reason for removal of wolves from the wild. Ranchers who enjoy the privilege of grazing livestock on public lands must take responsibility for their livestock, including removing or rendering inedible livestock that have died of other causes before wolves scavenge on them. In cooperation with USFWS, the Forest Service should prioritize recovery of endangered species (such as Mexican wolves) and the restoration of healthy ecosystems, and implement grazing policies that would minimize wolf-livestock conflicts. Livestock management strategies to reduce conflicts could include avoiding grazing near denning and rendezvous sites, penning susceptible livestock at night, and the use of range riders. (Dr. Tuggle's proposed interdiction fund could provide funds to assist with these measures, and should promote the presence of live wolves on the ground.)

**Revise the recovery plan.** The Recovery Plan has not been revised for 25 years and does not include objectives for full recovery.

**Place no cap on the number of wolves in the wild population, and include nothing in the amended rule that would preclude future recovery options.** A self-sustaining population of 100 wild wolves is a minimum for successful recovery. No maximum should be set through this rule change. This rule should not include any provisions that would limit future options for recovery of Mexican gray wolves anywhere outside the current boundaries of the BRWRA.

Thank you for considering my thoughts. Successful recovery of Mexican gray wolves in Arizona and New Mexico is very important to me, so please keep me informed of future opportunities to participate.

Sincerely,



Bettina Bickel

Ed Bickel  
460 Stonehedge Road  
Wickenburg, AZ 85390

December 20, 2007

Attn: Mexican Gray Wolf NEPA Scoping  
U.S. Fish and Wildlife Service  
New Mexico Ecological Services Field Office  
2105 Osuna NE  
Albuquerque, NM 87113

Dear John Slown,

Please accept the following comments on the Mexican gray wolf EIS scoping process:

As an avid outdoorsman and hunter, I value Arizona's wildlife and healthy ecosystems, and strongly support the reintroduction of Mexican gray wolves to ecologically effective population levels. Wolves have an important role as top predators in promoting a healthy ecosystem. Their influence on the behavior of elk helps to restore riparian areas which are critical to many other species. Wolves may also balance other predators such as coyotes. In Yellowstone, biologists have documented increased pronghorn fawn survival near wolf dens, possibly since coyotes are likely to avoid these areas.

As a hunter, I recognize that wolves will change the behavior of elk and make them more challenging to hunt. True sportsmen will relish this challenge and appreciate a wild area with its top predator restored.

The following changes should be made to the program:

**Include a Conservation Alternative that will change the classification to "experimental, essential" or "endangered". The current "experimental, nonessential" classification is not resulting in successful recovery.** As the only wild population, this population of wolves is essential to the long-term recovery of Mexican wolves.

**Eliminate all restrictions to wolf dispersal and movements.** Current rules require the capture of wolves that disperse outside the arbitrary boundary, resulting in wolf injuries and disruption of pack relationships and preventing wolves from dispersing naturally to high quality habitat outside the artificial boundary. Wolves should be allowed to disperse naturally to good habitat, including the Grand Canyon Ecoregion.

**Expand the area for initial releases to anywhere within the Blue Range Recovery Area.** This would allow biologists to release wolves based on considerations such as existing pack territories and genetic variability, rather than on political constraints.

**Resolve wolf-livestock conflicts in ways that keep wolves in the wild and achieve progress towards reintroduction objectives.** Conflicts with livestock are the main reason for removal of wolves from the wild. Ranchers who enjoy the privilege of grazing livestock on public lands must take responsibility for their livestock, including removing or rendering inedible livestock that have died of other causes before wolves scavenge on them. In cooperation with USFWS, the Forest Service should prioritize recovery of endangered species (such as Mexican wolves) and the restoration of healthy ecosystems, and implement grazing policies that would minimize wolf-livestock conflicts.

**Stop killing and removing wolves.** Currently, the wolf population is heavily subsidized by continued releases, while limited by excessive "take". The revised rule must allow less "take" to allow population recovery.

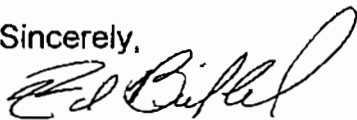
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**Include nothing in the amended rule that would preclude future recovery options.** This rule should not include any provisions that would limit future options for recovery of Mexican gray wolves anywhere outside the current boundaries of the BRWRA.

Thank you for considering my thoughts. Successful recovery of Mexican gray wolves is very important to me, so please keep me informed of future opportunities to participate.

Sincerely,

A handwritten signature in cursive script, appearing to read "Ed Bickel".

Ed Bickel

Jean Bickel  
460 Stonehedge Road  
Wickenburg, AZ 85390

RECEIVED

DEC 31 2007

December 26, 2007

USFWS-NMESFO

Attn: Mexican Gray Wolf NEPA Scoping  
U.S. Fish and Wildlife Service  
New Mexico Ecological Services Field Office  
2105 Osuna NE  
Albuquerque, NM 87113

Dear John Slown,

Please accept the following comments on the Mexican gray wolf EIS scoping process:

I value Arizona's wildlife and healthy ecosystems, and strongly support the reintroduction of Mexican gray wolves to ecologically effective population levels. Wolves have an important role as top predators in promoting a healthy ecosystem. Their influence on the behavior of elk helps to restore riparian areas which are critical to many other species. Wolves may help to balance other predators such as coyotes, and affect the ecosystem in many ways which are vital to its long-term sustainability.

The wolves have shown that they are capable of hunting prey, forming packs, and raising pups. Unfortunately, political constraints which give ranchers priority over successful recovery of this magnificent and critically endangered species have prevented the recovery of a sustainable wild population of wolves. The following changes should be made to the program:

**Include a Conservation Alternative that will change the classification to "experimental, essential" or "endangered". The current "experimental, nonessential" classification is not resulting in successful recovery.** This is the only wild population of Mexican gray wolves and it is essential to the long-term recovery of the species.

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**Expand the area for initial releases to anywhere within the Blue Range**

**Recovery Area.** This would allow biologists to release wolves based on considerations such as existing pack territories and genetic variability, rather than on political constraints.

**Resolve wolf-livestock conflicts in ways that keep wolves in the wild and achieve progress towards reintroduction objectives.** Conflicts with livestock are the main reason for removal of wolves from the wild. Ranchers who enjoy the privilege of grazing livestock on public lands must take responsibility for their livestock, including removing or rendering inedible livestock that have died of other causes before wolves scavenge on them. In cooperation with USFWS, the Forest Service should prioritize recovery of endangered species (such as Mexican wolves) and the restoration of healthy ecosystems, and implement grazing policies that would minimize wolf-livestock conflicts.

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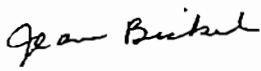
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Thank you for considering my thoughts. Successful recovery of Mexican gray wolves is very important to me, so please keep me informed of future opportunities to participate.

Sincerely,

  
Jean Bickel

P.S. The recent reporting by High Country News of possible baiting of wolves and other events on the Adobe Slash Ranch illustrates the importance of ending the "three states" rule.

Bickel  
460 Stonehedge Road  
Wickenburg, AZ 87113

PHOENIX AZ 850  
28 DEC 2007 PM 9 T

Mexican Gray Wolf NE  
U.S. Fish and Wildlife S  
2105 Osuna NE  
Albuquerque, NM 8

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Jon H. Midgley  
P.O. Box 686  
Tonopah, AZ 85354-0686

December 20, 2007

Attn: Mexican Gray Wolf NEPA Scoping

Brian Millsap, State Administrator  
U.S. Fish and Wildlife Service  
New Mexico Ecological Services Field Office  
2105 Osuna NE  
Albuquerque, NM 87113

RECEIVED  
DEC 26 2007  
USFWS-NMESFO

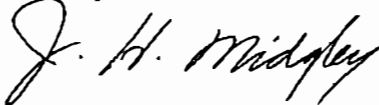
Dear Sir:

It appears that the long-term success of the Mexican Wolf reintroduction program in Arizona and New Mexico is in doubt and that changes need to be made to prevent the wolves' ultimate extinction in our part of the Country. Positive changes will be well received, except, perhaps by ranchers using our publicly owned lands who might feel entitled to set the policies in their favor. They may feel a sense of ownership by having used our public lands for so long –but that sense of ownership is misplaced. Attitudes are changing in favor of the wolves in the minds of the Public in general and for Governor Richardson and, very likely, the next Administration in Washington.

A Recovery Plan revision is overdue and I would ask you to please give the wolves a realistic chance for survival by adopting the following suggestions:

1. Protect the wolves by changing their classification to "endangered" or, at a minimum, to "essential".
2. Expand their range to a more realistic size that gives them the opportunity to reach a sustainable population in Arizona and New Mexico.
3. Eliminate all killing of wolves—better solutions can be implemented.
4. Allow wolf releases in New Mexico as well as Arizona.
5. Resist any attempts by ranchers or others to include "poison-pill" provisions designed to sabotage the Recovery Plan.

Sincerely,



Jon H. Midgley

**LINDA Z. LEBLANG**

7949 E. PLEASANT RUN COURT  
SCOTTSDALE, ARIZONA 85258  
480 483 7252  
LZL1@AOL.COM

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DEC 26 2007  
USFWS-NMESFO

December 21, 2007

Brian Millsap, State Administrator  
U. S. Fish and Wildlife Service  
New Mexico Ecological Services Field Office  
2105 Osuna NE  
Albuquerque, New Mexico 87113

Dear Brian;

I am writing to comment on the **Mexican Gray Wolf Reintroduction Project**.

I have been a strong supporter of the Wolf Reintroduction Project since its inception before it even got off the ground. I have believed in saving the wolves since 1979 when I worked with the Save the Wolves in St. Louis, Missouri. It has broken my heart each time there is a wolf killed or gone missing. It is not just the wolves here in Arizona/New Mexico, but all the wolves across these United States that need protection.

I am going to address, at this time, the Mexican gray wolf situation. I recently rode the Verde River Canyon Train in the backcountry of Arizona. The environment awed me but I was even more awed that in this part of Arizona the only large food chain animal existing is the javalina and coyotes. The ranchers have destroyed all the bears, assorted cats, and wolves. Now, there are few ranchers. Many of those ranchers that have left have abandoned their cattle in the Verde Valley to pollute the river and streams. The cattle are multiplying because there are no natural enemies. Neither the ranchers nor the forest service will spend the money to remove them. I could not help but think what a great place to allow the wolves to expand their territory. A vast empty area - just waiting for repopulation of some larger food chain mammal other than man.

So, now that I have given you those thoughts here is what I would like to see happen to specific rule changes which would better enable the success of the wolf reintroduction and recovery effort. The Mexican gray wolf, despite being the most endangered subspecies of wolf in the world, faces needless obstacles on its road to recovery. As you know, many wolves have been killed illegally due to human intolerance, and current recovery rules are burdened with political compromises. Wolves are recaptured due to their inability to recognize artificial boundaries, and for actual or potential depredation on livestock; many have suffered injuries and disintegration of pack structure during these captures and translocations. Just in 2007, 21 wolves have been intentionally killed, gone missing, or been forcibly removed by the very agency charged with their protection. That isn't protection but it is **poor oversight and management**.

Please work without any further unreasonable delay to obtain and implement the following rule changes:

**First of all, before anything else can happen, the wolf classification has to be changed.** It can no longer be called "experimental", and it needs to be changed to



"endangered". *This is truly an endangered species.* It can't be that difficult to see why. By designating the wolves "*endangered*", there would be better laws to protect them in the wild. Keeping the wolves as captives is not the answer. They need to be released, they need to be allowed to roam, and they need to be **PROTECTED**.

**Allow wolves to establish territories outside of the Blue Range Wolf Recovery Area (BRWRA).** Animals don't understand boundaries except territories they form themselves. Man-made boundaries are useless and only hurt the wolves. As the population grows, their boundaries expand to create new packs. They need good access to the natural foods that they hunt for. Under the current regulations, one foot outside the range means death to that wolf, or if likely, recaptured. This upsets the natural order of the wolf and their social structure. There are millions of acres of public land that would support the wolves. **THERE SHOULD BE NOT BE BOUNTARIES FOR THE WOLVES. THEY SHOULD BE ALLOWED TO TRAVEL FREELY.**

**Allow initial releases to be anywhere within the Blue Range Wolf Recovery Area.**

**Allow the Interagency Field Team to release wolves directly into the Gila National Forest.** This is so vital to the future wolf generations. It makes no sense that only wolves previously removed from the Apache-Sitgreaves National Forest may currently be released into the Gila.

Pet owners should not be allowed to kill wolves. Just as homeowners in the cities cannot kill coyotes for killing their pets. Homeowners have a responsibility to take care of their pets and not let them harass or interfere with the wolves.

**Require livestock operators on public land to take some responsibility for carcass management / disposal to reduce the likelihood that wolves become habituated to feeding on livestock.** For years we have written about this issue. Several years ago, there was a strong recommendation in the Paquet Report regarding this opportunity, yet to this day, nothing has been done and this issue continues to be sidestepped.

**STOP KILLING AND REMOVING THE WOLVES: REDUCE THE "TAKES"!**

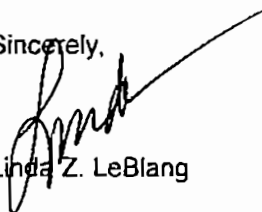
**What happen to the Recovery Plan.???** It needs to be updated so it doesn't preclude future recovery actions. All terminology needs to be agreed on, not only by the Fish and Wildlife Service but also by the biologists, ranchers and residents. All participants need to be part of this plan and allowed to give input and participate in the decision-making.

In addition, there should be some discussion and recommendations concerning law enforcement of wolf mortalities. This is a surprising omission considering the Paquet Report's finding that "Human-related deaths were the greatest source of mortality for reintroduced Mexican wolves. Shooting was the major source of death."

I hope you are listening to the people and don't ignore us as one government agency (FCC) did. Please keep me apprised of developments in this area.

Thank you for considering my comments.

Sincerely,

  
Linda Z. LeBlang

Cc: Governor Janet Napolitano, Governor Bill Richardson

2653 N. Platina  
Mesa, AZ 85215

US Fish and Wildlife Service  
Attn: Wolf program  
New Mexico Ecological Service Field Office  
2105 Osuna NE  
Albuquerque, NM 87113

To Whom It May Concern:

I recently became aware of the issues concerning the Mexican gray wolf reintroduction program. I want to voice my support for this program with the emphasis on the responsibility of the ranchers to stop killing wolves. I understand that many ranchers are not acting in the interest of wolves by not removing dead cow carcasses or treating them with lime (to make them inedible).

We must do everything possible to make wolf reintroduction successful. We need these predators for the ecological balance. Why should ranchers interests be above nature? Ranchers are compensated for their losses, if they experience any. I am just incensed at their selfishness, and I certainly would like to see Fish and Wildlife enforce rules to make ranchers more responsible to the environment.

Please support successful wolf reintroduction by holding ranchers more responsible in their behaviors. Our environmental health depends on it.

Thank you.

Sincerely Yours,

*Lori B. Girshick*

Lori B. Girshick, Ph.D.

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DEC 21 2007

USFWS-NMESFO

December 22, 2007

P.O. Box 63  
Overgaard, Arizona 85933

Mr. Brian Millsap  
State Administrator  
U.S. Fish and Wildlife Service  
New Mexico Ecological Services Field Office  
2105 Osuna NE  
Albuquerque, New Mexico 87113

RECEIVED  
DEC 26 2007  
USFWS-NMESFO

Dear Mr. Millsap:

I am responding to your request for comments on the Mexican gray wolf recovery effort. I favor several needed changes to the recovery protocols in order to increase the likelihood of successful recovery of this species. First, the recovery zone and non-essential experimental zone must be expanded beyond their current boundaries. It has become obvious that the current recovery zone cannot support the numbers of wolves needed to meet recovery objectives. The Mogollon Rim and Grand Canyon areas have several hundred square miles of suitable Mexican gray wolf habitat. Wolves should be allowed to freely expand to these areas and should be released into these areas to speed initial population expansion. Coordination between the Recovery Team and the White Mountain Apache and San Carlos Apache Reservations should remain a high priority, as both reservations have suitable wolf habitat that is likely to be used at least part of the year.

New recovery area boundaries must also consider the winter and summer ranges of mule deer and elk. Wolves should be allowed to follow these prey species to winter ranges and remain there at least until prey animals return to summer habitats.

Livestock depredations should be addressed differently than current protocols allow. Too many wolves are being removed from the wild population because of livestock depredations. There is wide spread public perception that some livestock growers in the existing primary recovery area are undermining wolf recovery by not changing their management practices. Livestock growers who pasture their animals on public lands should be required to remove dead animals as soon as they are detected and provide a full time herder to monitor livestock locations. Livestock owners and herders should be given the authorization and means to harass wolves that attack, stalk, or otherwise shadow livestock.


As the wolf population increases, wolves will likely become more common in populated areas. This will result in more interactions with domestic dogs, horses, and other pets. The public should be provided avenues to harass wolves that are a threat to pets but should not be allowed to "take" wolves. Protocols need to be established that allow the

public to participate in the conditioning of wolves. On the other hand, the public should also be required to limit wolf attractants, such as dog food left outside.

To attain and hold public support of the wolf recovery program, a well funded and vigorous public interpretation and education program must be continued and expanded. Michigan recently evaluated their wolf populations and solicited public comments from across the State to determine the public's attitudes and tolerance for wolves. I encourage the Mexican Gray Wolf Recovery Team, in coordination with the State Game and Fish Departments, to develop a similar survey to not only determine public attitudes, but also to use as an instrument to support future management actions.

I applaud the Service for realizing the wolf recovery effort must be altered in order to be successful and encourage you to provide Mexican gray wolves as much area and protection as is necessary for their recovery.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian Dykstra". The signature is written in a cursive, somewhat stylized font.

Brian Dykstra

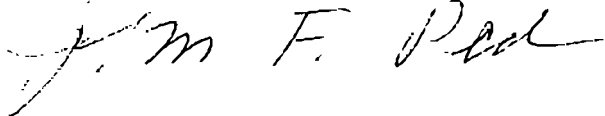
Bruce Millsap  
U.S Fish and Wildlife Service  
New Mexico Ecological Services Field Office  
2105 Osuna NE  
Albuquerque, NM 87113

RECEIVED  
DEC 26 2007  
USFWS-NMESFO

Dear Mr. Millsap,

I am writing in regard to the Mexican Wolf Introduction Program. I am a former serious backpacker, and am yet a serious hiker, and Sierra Club member, 71 years of age. However, I built my own cabin in Alpine, largely with my own two hands, and live there during the summer now. At the time we initiated the project, the wolf reintroduction plan was not public knowledge. Our son left us his lab mix dog. My wife and I hike daily during the summer in the vicinity of Alpine (within a ~ 3-4 mile radius), taking our dog on a leash. We have seen wolf scat, notices of wolf trapping by your organization, the stripped elk skeletons and tracks left from definite wolf kills, and heard reports of sightings within this radius, some less than a mile from Alpine residences. Last summer, we found the stripped skeleton of a young cow elk, most likely due to wolf predation, just a few hundred yards south of cabins in the Alpine Highlands Estates. I am totally against this expensive program. We should be able to hike with our dog in the above periphery around Alpine, without the possibility of defenselessly seeing our dog killed before our eyes, or, having to defend ourselves. I notice that the initial public announcements referenced "the remote Blue river area". Alpine is not remote any more! Furthermore, most supporters of wolf reintroduction seem to be residents of cities, who are far removed from wolves. The effectiveness of the wolf pack "business plan" was brought home by witnessing the attack of just two Chows on a single dog. We do not want to have any chance of experiencing this. If the numbers of elk are too great, the solution is simple. Just give out more hunting permits. My friends who are hunters have waited up to 14 years for a permit!

Please end the program now, removing all wolves, including uncollared young wolves, or, end the introduction of wolves, and permit residents to defend themselves and their dogs by any appropriate means. . As will likely be necessary, give out more elk hunting permits to control the number of elk.

  
John F. Peck  
P.O. Box 699,  
Alpine, AZ 85920

4145 E. 4<sup>th</sup> St.  
Tucson, AZ 85711.

12/24/2007

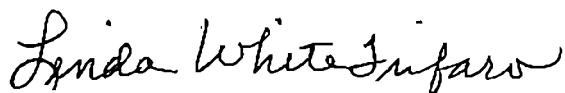
**Brian Milsap, State Administrator  
U.S. Fish and Wildlife Service  
New Mexico Ecological Services Field Office  
2105 Osuna N.E.  
Albuquerque, NM 87113**

**Dear Sir:**

**This and the following 5 pages contain my comments and inputs in response to the preparation of the draft EIS through the NEPA process and socio-economic statement in conjunction with a proposed rule to amend the 1998 final rule (Federal Register Vol. 72, No. 151, 8/7/2007, pgs. 44065-44069). That rule authorized the establishment of a nonessential experimental population of the "Mexican gray wolf" in Arizona and New Mexico, under section 10(j) of the ESA.**

**I urge you to seriously consider these matters so that wolf recovery can again get underway as it has made negative progress over the last several years.**

**Thank you for your consideration and please keep me on all mailing lists relative to this process.**



**LINDA WHITETRIFARO  
Box 768  
Alpine, AZ 85920**

**Comments for consideration in the Preparation of an Environmental Impact Statement (EIS)  
for the Amendment of the 1998 Non-essential experimental population (10j) rule for  
Recovery of the Subspecies, Mexican Gray Wolf, in Arizona and New Mexico**

The Blue Range Recovery Area (BRWRA) is the primary recovery zone (Apache-Greenlee county line south to the San Francisco River), with secondary recovery zones on the Apache portion of the Apache-Sitgreaves National Forests including the area north of this county line and south of this river, and including the Gila NF in New Mexico. The Mexican Wolf Experimental Population Area (MWEPA) includes the above areas and stretches from I-40 on the north, to I-10 on the south, and from I-17 on the west, to I-25 on the east.

There are 7 issues (a through g) identified in the Fed. Reg.

**(Issues a and c) Where wolves are allowed to establish territories-**

Comment: Wolves have established outside the primary and secondary recovery zones and successfully survived and reproduced with little to no livestock depredation problems (examples: San Mateo, Frisco, Nantac, Saddle packs). Because the biology has proven itself, amend the rule to allow any successful establishment of wolves within the MWEPA.

Additional comment: Because it provides limited habitat and prey, the White Sands Missile Range should not encompass any *primary* recovery zone area as it does now.

**(Issue b) Initial wolf releases into secondary recovery zones currently not allowed-**

Comment: The current restriction is artificial and is impacting genetics. Because it is political and not biological, allow initial releases in the secondary zones.

Additional comment: Do NOT hold public meeting on each and every individual release because releases tied to recovery have already gone through the NEPA process in the preparation of the original EIS. Currently meetings are being held on individual releases but this is not required, has not been productive or helpful, and the meetings become mere grandstanding about recovery which has already been addressed and merely provide opportunity for public abuse of federal and state employees doing their job.

**(Issues d and e) Responses to nuisance behavior by wolves, including “take” of wolves when they attack dogs on private or tribal lands-**

Comment: Remember that under the Endangered Species Act, these Mexican gray wolves, as part of this “nonessential, experimental population,” are to be treated as “proposed endangered” in terms of effects to them. As such, *and* in order to recover wolves, the prohibitions against take and harm should remain *firmly* in place. Harassment is currently allowed and it *may be* appropriate to expand what entails “harassment” such as allowing use of paint balls (although paintball paint is considered littering and defacement of public lands at this time) or use of pepper spray (this would need studying in order to determine the pack’s reaction to a wolf incapacitated temporarily by the spray, since weakened animals can be attacked by other wolves).

Any expansion of harassment regarding protection of dogs should be within the limits whereby take or harm of the wolf should not occur; keep this in mind: instances of wolf attacks on dogs have been limited and all have been compensated by Defenders of Wildlife; as well, these instances have rarely resulted in serious injury to the dog.

Additional comment: Ranchers should have *no* harassment privileges on public lands over what any other member of the public can have; this has been the root of so much of the program's problems to date, i.e., special considerations for and catering to public land ranchers which has fostered a belief on their part that their personal demands trump the interest of the American public.

Additional comment: The greater context for nuisance wolf behaviors is knowledge-- the knowledge about how to react to wolf presence (e.g., someone hiking with dogs) and how humans create problem situations (e.g., dog food left out). Of the outreach and public information currently underway through the wolf recovery effort, only a small component is for the general public (campers, hikers, interested conservation groups, etc). The program *is* under staffed, but essentially all current efforts are directed toward ranchers, including continual calling and contact with ranchers even where there are no current wolf problems; this should not be so and there should be a much greater emphasis and effort to reach out to others.

**(Issue f) clarify definitions of "breeding pair," "depredation incident" and "thresholds for permanent removal"**

Comment: First, any changes to definitions should facilitate wolf *recovery*, and outweigh the plethora of standardized, repetitious complaints and demands by public lands ranchers and counties. Next, depredations or nuisance/problem incidences should only count against *lawfully* present livestock which, by its own (Forest Service) rules and regulations, means more than just having a term grazing permit. As part of the term grazing permit, the where, when and numbers of livestock grazing is specified yearly. To be out of these prescriptions is to be out of authorization and is subject to adverse permit action and fines (non-discretionary unauthorized use charges). As such, wolves should *not* be penalized for public land ranchers' failure to follow the terms that allow them the privilege to use a public resource for fees that are well below the market value of the resource to start with (note: on 3 separate occasions, the US Supreme Court has ruled that public lands grazing is a privilege, not a right).

Additional comment: Regarding carcass management-- if indeed every lost cow or calf is a drastic blow to the public land rancher's economic viability, that rancher will be frequently checking their stock and will know of essentially every lost animal. It is then easy, and cheap, to render carcasses unpalatable to scavengers by applying lime. Again, the Forest Service already has the authority to require this under clauses in section 8 of every term grazing permit issued. Biologically, wolves scavenge, so wolves that scavenge on livestock carcasses (that died of reasons other than their own depredation) should not be considered "nuisance" or "problem" wolves.

**(Issue g) Center for Biological Diversity 2004 petition-**

Comment: No information is given in order to respond to this item.

**Other important matters for consideration-**

There are apparent discrepancies between Arizona (Apache Forest) and New Mexico (Gila Forest) that need to be addressed (see below). It can be said these are outside the current EIS considerations but because these are *clearly and significantly affecting wolf recovery between the primary and secondary zones* and because these matters are under the jurisdiction of one of the partners in the wolf recovery program, i.e., the Forest Service, they cannot be ignored if Mexican gray wolves are to be recovered. If these *are* ignored, then there is no amount of other convoluted efforts that will make up for ignoring these matters, and recovery will not occur (the situation to date), and wolves should be removed from the wild entirely. Specific examples follow:



>At above 7,000 ft in elevation there is essentially no winter/spring grazing in Arizona, a time when forage plants are not growing and when dried forage does not even provide enough protein to maintain a cow. However, at these elevations there is grazing in New Mexico during the winter/spring (spring is also denning time for wolves); in fact, one NM grazing allotment at 8,000 ft in elevation was always grazed only in the summer/fall but today is grazed yearlong.

>In Arizona, cattle are not present in every pasture, all the time; however, this appears to be the case in New Mexico, hence there is a greater opportunity for livestock-wolf encounters in New Mexico which has proven true.

>Recent-born calves are seen in Arizona only during the spring but they are seen yearlong in New Mexico; any university extension agent will note that this is a poor livestock production practice that will limit the number of calves per cow over her lifetime and will limit the subsequent economic returns to the rancher.

>There are some areas that never have livestock in Arizona such as flowing rivers and creeks, and high elevation spruce forests; however, livestock are always seen in these areas in New Mexico.

>Between about 1997 and 2006 greater than "normal" drought conditions occurred in eastern Arizona and western New Mexico. The Arizona forest made adjustments in livestock grazing to compensate for the drought impacts to plants over this period; however, the New Mexico forest did little. It now appears that grasses and rangelands have come through this period in a much healthier condition in Arizona than in New Mexico...and the better habitat conditions benefit the wolves' wild prey which in turn benefits wolves.

### **Other Issues for Consideration during the NEPA process for the upcoming EIS**

#### **●*The removal or killing of 59 wolves over the course of reintroduction-***

Comment: This has clearly hindered, in fact stalled, wolf recovery. The provision for removal (lethal or otherwise) after three livestock depredations is *not* a biological tool for recovery but rather a management tool after establishment of a population. This approach was not used during establishment of the Northern gray wolf (where additionally there were possibilities for recolonization from Canada) and it makes even less sense for the Mexican gray wolf where there is *no* potential for any other means of population recovery.

Additional comment: The three "strikes" approach is also being applied to domestic sheep on public land; however, in terms of forage needed, grazing fees and animal unit months (AUMs), 5 sheep are equivalent to one cow; hence, by definition, 15 sheep should equate to 3 cows in terms of depredation.

Additional comment: The captive wolf facilities across the country are overflowing with removed wolves, another reason to drastically limit removals; and, packs with wild-born pups should *never* be removed because 1) they are the hope and future of recovering a wild wolf population and 2) the impact of captivity on captured and removed wild-born animals has been horrible, as has been demonstrated at the Sevilleta Facility.

●*25 wolves have been shot and killed (with one self defense determination and only one prosecution), 3 have currently disappeared, and there have been openly admitted actions by a public land ranch manager with the objective to purposely entice nearby wolves (while creating "post traumatic stress syndrome" in one of his own family members)-*

Comment: For all the huff and bluff in Catron County Surely federal law enforcement can do better than this; even the self-defense case was questionable but was one of the first futile efforts to try to make wolf recovery acceptable to everyone; hence, it appears that enforcement of laws and regulations for wolf recovery is not a priority, for political (?) or poor budget reasons(?).

● *Payments to public lands ranchers for wolf depredations or injury to stock or other animals-*

Comment: This is entirely within the purview of a private group (like Defenders of Wildlife) but where payments are made to public lands ranchers who are unwilling to make adjustments or unwilling to live with wolves, it fails to meet the objective for which the program was developed, i.e., acceptance of wolves. Payments to public lands ranchers made by the federal government, as is being currently proposed, is *wrong* in that the Endangered Species Act is the law of the land. Do we pay people to abide by other laws?

If the rancher's own need to improve livestock husbandry and economic return, along with the already very minimal fees for grazing on American's public lands, and the countless other financial assistance ranchers receive (the cost of Wildlife Services handling predator problems on public and private land is paid by the county, Arizona state gives ranchers open space payments, ASCS gives payments for feed and other drought assistance, there re agriculture producer tax write-offs when a cow is lost)—if all this does not make the presence of wolves more tolerable, *neither* will any additional payments from the public coffers. Even though public lands ranchers have demonstrated they will take any payment, many have demonstrated that it will not change their attitude (which is ok) and it will not change their management (which is not ok).

● *Recovery of wolves on public lands; or implementation of livestock grazing that is appropriate for resource conditions, livestock numbers and seasons on public land; or any changes to the very limited management required of permittees on public lands—all these will result in failure of the ranch, will result in significant impacts to the county economy, and will result in the selling of private ranch lands to the detriment of all wildlife-*

Comment: Each and every aspect of the above statements is unfounded and such unsubstantiated general perceptions are accepted by most people without critical evaluation. In fact, there have been substantial changes in livestock management, numbers, and grazing seasons in the primary recovery zone in Arizona and these have not resulted in loss of one ranching operation in Arizona. Economic analyses by the Forest Service show that the percent of return to the local economy and county, both directly and indirectly, are miniscule in Arizona and limited in New Mexico. Any selling and subsequent subdividing of private ranch lands will not come about because of what happens to grazing permits but will come about due to the *economic value* of the private lands in the primary and secondary recovery zones as compared to the returns generated by the best and most economical public lands ranching operations, especially in today's market and Western US population demographics. It is time to stop citing these non-facts as bases for compensation or for hoped-for wolf-tolerance payments.

● *AMOC's composition of every agency director, the multitude of Standard Operating Procedures (SOPs) and giving the Arizona Game and Fish Dept. lead early in the recovery effort-*

Comment: No other species under an ESA recovery effort has this massive multi-agency political oversight and wolf recovery has not been facilitated by it. Arizona Game and Fish Department, as the lead field agency, has also not facilitated wolf recovery; notably: giving ranchers wolf radio receivers that created fear and chaos every time a wolf walked through the area (this is not done with bears and lions, because it would do the same thing) and the Department's micro management up through and at each level of the Department for every action considered by the field team.

● *Known predation since 1998 of 110 head of cattle-*

Comment: Because of the limited costs required of the rancher associated with grazing livestock on public land, many public lands ranchers do not spend much time checking herd well-being as do ranchers with a greater investment in their herds; as such, wolf predation could be higher than then 110 head cited in the Federal Register; however, this is unlikely given the continual tabs the field team keeps on wolves and their constant searches for uncollared wolves.

Additional comment: Even if the loss cited was instead 350 head, compensated has been paid for every confirmed loss (somewhat less than \$100,000 has been paid out in total since 1998 by Defenders of Wildlife). Consider that the 350 head figure would come to only 35 head per year for the past 10 years of wolf reintroduction efforts, in spite of the individually relatively high reported losses to a few marginal livestock operations (one manager of which openly admits to enticing wolves to predate on the ranch owner's livestock, sitting all night with night-vision hoping a wolf would come in to his personally inflicted bleeding cattle). That number also represents, *at most*, 1% of all the livestock on public land in the primary and secondary recovery zones—so much ado is being made over less than a mole hill (for a mixed metaphor), but the responses of the recovery agencies since 1998 have essentially, to date, stalled recovery effort in response to that “ado;” it is no wonder that there is a Notice of Intent to sue some of these agencies for failure to carry out their obligation under the Endangered Species Act.

● *It has been asked “What values do we as individuals in society place on wolves and how much are we willing to tolerate them on the landscape?” (Morgart)-*

The answer to those questions have already been made: the vast majority of individuals in this society have spoken to their values through passage of the Endangered Species Act, by placing a high value on restoring wildlife and other species falling from the web of biological diversity. It is true that no law affects everyone equally but our laws still reflect societal values. *More than every reasonable*, and plenty of unreasonable, efforts have been made to reduce impacts to those who feel they are most affected by recovery of the Mexican gray wolf; however, it is time to stop efforts that have proven futile in an attempt to make the wolf palatable to, or to placate the few who are the most vocal and who have avowed to never accept the wolf in spite of what the law requires...It is time to start truly recovering the wolf through sound biological management and as required by law.

Date: December 26, 2007

To: U.S. Fish and Wildlife Service – Attn Wolf Program  
New Mexico Ecological Service Office  
2105 Osuna N.E.  
Albuquerque, New Mexico 87113

From: Lowell Hansen  
HC30 Box 22-J  
Concho, AZ. 85924

Re: Public Comment Request for the Mexican Gray Wolf Program

Gentlemen,

I have supported the Mexican Gray Wolf Reintroduction Program since the beginning. I have attended several of the wolf meetings over the years and find that very little, if anything, was ever really done "FOR" the wolf at those meetings. The wolf workshop at Hon-dah was a disaster and could have been very beneficial to educating the Public about our Mexican wolves.

I very strongly object to the killing of AFXXX in July, by a government hunter. This was absolutely "senseless"! I have read the SOP's and for the most part agree with them, however I have found this "three strikes and your out" rule to be absolutely senseless! In July '07 you issued a lethal order to destroy AF XXX for cattle predation. This was extremely upsetting to many people, myself included. The "three strikes and your out" is an "old saying" that comes from the human criminal element. Obviously, this did not work for them and needs to be removed from any wolf association.

I have noticed that you have issued an order to capture part of the Aspen Pack for relocation into captivity. First of all, you are taking the AF away from her mate. The AM does not know what happened. Wolves have a beautiful family life that is very important to them. Yes, they do mourn the loss of their mate and pups. Unfortunately, we can't tell them what we don't want them to do. Wolves do what they want to do, when they want to do it! They need to eat just like we humans do and we would also kill anything to survive, just like a wolf.

After many years involved with raising cattle for profit in Canada, Minnesota and Arizona, I wish to voice my opinion of Arizona's open range and the wolves. First of all, wolves have a right to live on this earth as a predator. The USFS needs to eliminate the grazing permit system to allow the wildlife to consume the forage in the forests. The drought over the last few years has greatly impacted the amount of forage available. When we tried to sell our USFS graze permits there were no buyers. The open range cattle market in Arizona is not in a healthy financial condition.

In Canada, where there are approximately 50,000 wolves, people have learned to live with the wolf. They have the larger size timber wolves running 120+ lb. or so. There never has been a human-wolf contact that has resulted in injury to a human. The Minnesota area has approximately 3,000 northern gray

wolves, with the people accepting them there too. Arizona needs to become educated that wolves can exist here with out conflicts. The wolves need to be allowed to mature in the wild, by doing and going where they want to. It's good to keep track of them, but not to step in and interfere with their lives. Definitely do not kill anymore of them! It does not provide anything beneficial to the wolves. There are enough natural hazards out there to content with, including the anti-wolf people in Catron County, New Mexico

I would suggest that the penalty for killing a Mexican gray wolf be increased monetarily and to include jail time. There are people out there that have said, only if they are caught.

In closing, I would like to see more public education about the Mexican Wolf and more public meetings that would allow communication with you as a panel. In the past, the meetings with the Az Game and Fish have not allowed any discussions to take place.

Respectfully,



Lowell Hansen



# **THE PLATEAU PARTNERSHIP**

P.O. Box 426 • St. Johns, AZ 85936  
Phone: (928) 337-4159 Fax: (928) 337-4499



December 27, 2007

John Slown  
US Fish and Wildlife Service  
New Mexico Ecological Services Field Office  
2105 Osuna, NE  
Albuquerque New Mexico 87113

Re: Wolf scoping

Dear Mr. Slown:

Unable to attend any of the scoping meeting, I should like to submit written comments.

1. What is the DNA makeup of the wolves being released? Are they hybrid and do they—from a DNA perspective—result in a reintroduction or in the introduction of an entirely different species?
2. Is a non-essential and experimental wolf reintroduction in west-central New Mexico truly feasible in the dawn of the 21<sup>st</sup> century? Why is the program still in existence given the escalating economic costs, damage to livestock producers and divisiveness between those pushing the program who do not live in the area and those who do live in the area and are affected by the program?

The wolf has been eliminated from west-central New Mexico for the better part of a century. Conditions in the area are no longer what they were in the 19<sup>th</sup> Century and the early portions of the 20<sup>th</sup> Century. There are considerably more people living in what were uninhabited areas. Recreation and hunting have increased. There are more domestic animals in the area—not just cattle but horses, dogs, chickens and cats.

What are the social/cultural/economic impacts to a wolf reintroduction program given the changes over the last century and a half and ultimately,

can a reintroduction program even be successful given the changes?

3. Is the removal of livestock carcasses i) cost effective and ii) would it actually result in diminished livestock depredation? There is a bald assertion by wolf advocates that carcasses result in the wolf acquiring a “taste” for beef. Is there any peer reviewed science that actually suggests wolves are an animal even capable of “acquiring tastes” for certain species?

4. How are assertions that wolves will not attack humans squared with experiences in this nation prior to their eradication (previous to the 100-year period in which wolf advocates claim there are no “documented” attacks) and with experiences in Canada, Europe, and Asia?

5. What are the liability issues should there be a wolf attack?

6. How is an experimental and non-essential wolf reintroduction program squared against the takings requirement of the Fifth Amendment to the U.S. Constitution and the requirements of the New Mexico Constitution? The latter contains more stringent provisions than the U.S. Constitution. Specifically, Article II, Section 20 of the New Mexico Constitution contains a prohibition not only on the taking of property without compensation but also on the damaging of property. Additionally, Article II, Section 4, of the New Mexico Constitution affirms the right of “protecting property.” How are these provisions squared when under an experimental and non-essential program, cattle, dogs, chickens and cats are exposed to depredation by wolves placed in the area by the Federal Government? At present, not only are there compensation issues but also the prohibition under the program on the ability of persons to protect their property and to exclude wolves from their private property. For example, we own over 16,000 contiguous acres in Catron County and simply do not want wolves on our property. We run an outfitting business, breed expensive cutting horses and Border Collies. We also are in the process of forming a hunting club for our property which includes the selling of home sites. How do we exclude wolves and the threats they pose to our guests, invitees, livestock, horses and dogs? How can an experimental and nonessential program trump the provisions of both the U.S. and New Mexico Constitutions?

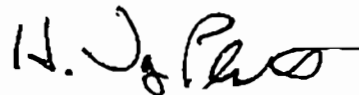
7. What are the health issues presented by wolves? USDA is presently pushing its animal ID program (NAIS.) Part of the impetus behind NAIS is homeland security and the fear of terrorist introduction of disease. One of the diseases USDA specifically mentions is Foot and Mouth Disease. How will wolves impact the potential spread of FMD—especially given that they are among livestock and their locations are not limited to specific livestock herds? How will they impact NAIS and trace back? What is the potential for the spread of other diseases, by feces or otherwise? What of rabies, especially given the encounters with wolves by domestic animals?

8. What are the economic impacts on the livestock business from wolf introduction and what is the potential for the development of forest inholdings and large tracts of private lands outside the forest should ranchers determine they cannot stay in business? What are the environmental, cultural, and economic effects should ranchers be driven out of business... with the result that i) forest inholdings are developed and ii) large tracts of private lands outside the national are developed?

9. What are the benchmarks for determining when a non-essential and experimental program has succeeded or failed? Is there a limit to the dollars that will be spent on the program in an effort to make it succeed? If it is determined that the societal, cultural, economic impacts compel the conclusion that the program is a failure, what will be done with the wolves then in the wild?

10. What is the potential for wolves to breed with feral dogs or other canines such as coyotes and how would such breeding affect the program?

Sincerely,



H. Jay Platt



**Shirley Sproul**

---

**From:** "Shirley Sproul" <ssproul@vtc.net>  
**To:** <R2FWE\_AL@fws.gov>  
**Sent:** Sunday, December 30, 2007 9:52  
**Subject:** "Mexican Gray Wolf NEPA Scoping"

*Attached, please find  
a copy of the e-mail  
I sent regarding  
the "Mexican Gray  
Wolf NEPA Scoping"  
on Dec. 30, 2007.  
Thank you  
Shirley A. Sproul*

**FROM:**  
Dec. 30, 2007

**Shirley A. Sproul**  
10707 E. Turkey Creek Road  
Pearce, Arizona 85625

**TO:**  
John Slown

**US Fish and Wildlife Service**

**New Mexico Ecological Services Field Office**

**2105 Osuna, NE**

**Albuquerque New Mexico 87113**

*R2FWE\_AL@fws.gov*

***Re: Notice of Scoping Meetings and Intent To Prepare an  
Environmental Impact Statement and Socio-Economic  
Assessment for the Proposed Amendment of the Rule  
Establishing a Nonessential Experimental Population of  
the Arizona and New Mexico Population of the Gray Wolf  
("Mexican Gray Wolf")***

***Thank you for allowing us to comment on such an important issue. It is well  
known that many people in Arizona and New Mexico do indeed oppose the  
Mexican Wolf reintroduction program from the onset. Many organizations  
and individuals have engaged in litigation against the program. With that in  
mind we still submit the following comments in the spirit of cooperation, and***

12/30/2007

*in an attempt to lessen the burden on residents of this area including, mothers, fathers, brothers, sisters, children, grandchildren, and great grandchildren.*

*We first concur with all comments submitted to you by the following organizations: New Mexico Cattle Growers, Arizona Cattle Growers, Coalition of Arizona/New Mexico Counties, and the Gila Livestock Growers Association.*

We believe that the following issues should be included in the scope of analysis:

1. Disclosure of the full social, cultural and economic impacts on rural residents and local governments to include the loss of tax revenue and increased government operation costs due to presence of introduced wolves.
2. Full investigation into the efficacy of livestock carcass removal including the increased cost to livestock operations.
3. Discontinuance of the practice of trans-locating problem wolves.
4. Improve prompt lethal and non-lethal control of problem wolves.
5. Improve monitoring of wolves to insure that residents of the release and recovery areas are informed when wolves are in close proximity and to facilitate documentation of predation on livestock.
6. Improve capture count collar and vaccination programs for Mexican wolves.
7. Commitment to maintaining the 10(J) status of the Mexican wolf program and adding common sense approaches to manage problem wolves.
8. The amending of the 10(J) rule to include the authority to harass Mexican wolves for purposes of scaring them away from people, buildings, facilities, pets and livestock. Specific language is needed to state a person may kill or injure a wolf if threatened by a wolf or in defense of another who is threatened, and may, kill a wolf that is not responding to harassment and is consistently in populated areas frequented by people and showing signs of being desensitized to human encounters.
9. The amending of the 10(J) rule to allow harassing or humanely dispatching of wolves by the USFWS or other federal, Tribal or state agencies when wolves exhibit fearless behavior or become habituated to humans and pose a demonstrable threat to human safety. This provision should include providing a federal take permit, for local county law enforcement personnel, to allow them to lethally take a wolf for immediate protection of human safety.
10. The amending of the 10(J) rule to allow serious and affective methods that will immediately stop wolf attacks on dogs and stop wolves from coming into private property and areas where people live. This should include public education practices that teach people how to deal with habituated wolves and give them the tools to do it. Also necessary is the need to issue take permits to those who are suffering these types of territorial challenges by Mexican wolves at their homes.

11. The 10(J) rule should document through appropriate mapping that people reside in current and potential wolf habitat. The general public has been given the mistaken impression that people do not reside in the wolf release and recovery areas.

12. Maintenance of the livestock production in the release and recovery area.

13. The effects of wolves on watersheds, spread of disease and domestic and wild animal populations.

14. An allowance in the rule for livestock owners or their agents may take (including kill or injure) any wolf engaged in the act of killing wounding or biting livestock on federally administered lands (see definition change) allotted for grazing anywhere within the Mexican wolf Experimental population area, including within the designated wolf recovery areas.

15. The need for definition changes in the new rule and management plans as well as any SOPs, such as:

**BREEDING PAIR:** an adult male and an adult female that are firmly mated and have the potential to breed and raise a litter of pups in the upcoming breeding season.

**ACTIVE PACK :** two (2) or more wolves that are attached to each other and exhibit pack behavioral characteristics.

**DEPREDACTION:** the confirmed killing or wounding of a domestic animal by one (1) or more wolves.

**INCIDENT:** the killing or wounding of a domestic animal by one (1) or more wolves.

**ENGAGED IN THE ACT OF KILLING, WOUNDING OR BITING LIVESTOCK:** to be engaged in the act of grasping, biting, attacking, wounding, or feeding upon livestock that are alive or were alive within the past 24 hours.

**LIVESTOCK:** any animal routinely contributing to the ability of a small businessman to earn a livelihood including but not limited to cattle, horses, goats, burros, llamas, chickens, stock dogs, guard dogs, hunting dogs and other domestic animal to which value is attached and the loss of which would prove to be a financial hardship and result in the takings of private property (pursuant to the Fifth Amendment of the U.S. Constitution).

**PUBLIC LAND :** lands available for dispersion into private ownership under general land laws to which no claim or rights of others has attached.

**FEDERAL LAND :** lands in which the United States retains a proprietary interest and prior claims and rights are attached.

**TAKE:** to harm, hunt, shoot, wound or kill.

**UNAVOIDABLE OR UNINTENTIONAL TAKE:** take which occurs despite reasonable care and is incidental to an otherwise lawful activity, and is not done with purpose. Taking a wolf by trapping will be considered unavoidable or unintentional if the wolf is released and the capture is reported within 24 hours. Taking a wolf will be considered unavoidable or unintentional if the wolf is taken during a legal hunting activity, is non-negligent and is reported within 24 hours.

**LEGALLY PRESENT LIVESTOCK:** should be defined as livestock occurring in the boundaries of a grazing allotment where the owner has beneficial use water rights.

16. Retaining definitions that do not warrant changes or additions from the current rule include the following:

Occupied Mexican Wolf Range , Opportunistic, Non-injurious harassment, Primary recovery zone, Problem wolves, Rendezvous site, Secondary recovery zone, Wolf recovery area.

Specifically, the definition of problem wolf should not be gerrymandered to move the goalposts

associated with management of problem behavior.

17. Takings implications assessments must be planned for and implemented in scoping rulemaking and management planning in order to determine the scope of compensation necessary to private property owners for depredation and losses caused by the program.
18. Implementation a federally funded pilot program aimed at compensation and interdiction to be run by ranching interests who are the experts in the field of livestock depredation causes and interdictions.
19. Change the current methodology for determining a depredation to the more reasonable Minnesota version which allows missing calves to be confirmed as wolf kills under certain circumstances.
20. Appropriately recognize and mitigate impacts to pastoral communities and individuals affected by introduced wolves.
21. Mitigation of the false or misleading information that has been issued as public education during so called scoping meetings including the power point presentation as well as the contents of posters that contain faulty information on wolf removals livestock depredation and food sources.
22. Livestock kills as a result of wolf management rather than grazing cycles must be properly analyzed. Currently the IFT and other managers are using subjective and speculative information to validate increased depredation problems, and example of which is the claim made in the scoping information education posters that year round grazing causes more livestock depredation.
23. More intensive and widespread data should be collected on wolf diet using scat studies from throughout the recovery area rather than one point and time date that leads to an incorrect conclusion that wolves are eating 75% elk as noted on a pie chart in the scoping and educational posters. This study is out of date and far to small to legitimately make that claim. There is also reason to believe the study is biased as scat from areas where livestock were present was not used in the analysis. Any NEPA analysis should provide for better information compilation in a new rule.
24. Site specific economic analysis on ranches that are being harmed
25. Analysis of problems associated with epizootic disease carried by wolves and potentially carried in wolf feces. The potential affect on people, domestic animals including pets and working dogs, and other wildlife.
26. Analysis of wolf occupancy of lands where domestic livestock are present and homes where children reside where domestic animals may contract a parasite or disease and spread it to humans or where wolves may directly deposit infectious materials near residences.
27. Cumulative impacts of wolf reintroduction and recovery should also be analyzed using local, county developed information on jobs, poverty and economics.
28. Takings implications of the affect of the current private property ban of use of M 44's and other lethal control devices used for predator management of species other than Mexican

12/30/2007

wolves.

29. The termination of the introduction effort should be a legal and reasonable option new EIS.

30. Insure that the scope of the economic impact analysis be limited to the individual rancher and at the most the county level. An analysis that is national or regional in scope fails to depict the real impacts

31. Review information distributed as fact in the scoping meetings and make corrections to that information. As is it is biased and subjective and should not have been made available as public education.

We submit these comments to the public record. And we believe that these comments provided by the Gila County Cattlegrowers do indeed capture the issues that are of concern to local land owners and residents of the area.

Thank you for your time and attention to these points.

Respectfully yours,

Shirley A. Sproul  
10707 E. Turkey Creek Road  
Pearce, Arizona  
85625

ssssssssssssssss

1-520-824-3344

12/30/2007



**ARIZONA LEAGUE OF CONSERVATION VOTERS**

**TUCSON OFFICE**  
 738 N 5th Ave Suite 102  
 Tucson, AZ 85705  
 Phone: 520-622-2819  
 Fax: 520-624-2577

**TEMPE OFFICE**  
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 Tempe, AZ 85282  
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 Fax: 480-966-9648

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 PO Box 40154  
 Tucson, AZ 85717  
**ON THE WEB**  
 info@azlcv.org

**FAX**

<b>Date</b> 31 Dec 2007	<b># Pages</b> 2
<b>TO</b> Brian Millsap	<b>FROM</b>
<b>Co./Dept.</b>	<b>Co./Dept.</b>
<b>Phone #</b>	<b>Phone #</b>
<b>Fax #</b>	<b>Fax #</b>

31 December 2007

Brian Millsap, State Administrator  
U.S.F.W.S.  
New Mexico Ecological Services Field Off  
2105 Osuna, NE  
Albuquerque, NM 87113

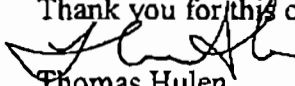
**RE: Mexican Gray Wolf NEPA Scoping Comments**

First of all I am grateful there are Mexican Wolves back in the wild and I hope to see the population fully recover. Unfortunately there are several obstacles preventing successful Mexican wolf recovery.

My suggestions that will lead to successful wolf recovery are:

1. Remove the fictitious "experimental nonessential designation" and change the populations status to "endangered" status. This change will reflect the reality of the situation. Let's be honest, the Mexican wolf situation in New Mexico and Arizona is dire.
2. Allow the Mexican wolf population to expand from the current artificial boundary to a situation that reflects the Mexican wolf's natural distribution.
3. Allow wolf reintroductions into other areas to reflect the natural distribution of Mexican wolves..
4. Develop a program that will force livestock growers to follow enlightened and predator neutral or friendly animal husbandry techniques.
  - Remove or properly dispose of dead livestock.
  - Protect livestock by corralling them or guarding them more effectivelyLivestock growers in the arid southwest need to realize that their leases are not rights. Their livestock are really nonessential to our dietary needs or the economy in the United States. Livestock growers in more mesic habitats can raise cattle on grass without government handouts and still make money.
5. Stop killing wolves for being wolves! We should encourage natural behavior, which does not include hunting people, instead of punishing them for their natural behavior.
6. Revise the recovery plan to include mandatory predator friendly animal husbandry techniques for livestock growers, and for the allowance for the wolves to expand their range. This will include allowing natural fluctuations in the population.

Thank you for this opportunity comment.

  
Thomas Hulen  
6625 S. McKemy Street  
Tempe, AZ 85283  
602.619.9717

**RECEIVED**

DEC 31 2007

USFWS-NMESFO

**COMMENTS ON MEXICAN WOLF RECOVERY  
NEPA, EIS, ETC.**

December 30, 2007

Mary Macnab

P.O. Box 85  
Blue, Arizona 85922



WHEREAS, since its inception the Mexican wolf recovery program (hereafter referred to as "the program") has been functioning under a law never enacted into positive law, the Endangered Species Act, the program therefore lacks any legal jurisdictional authority over any of the current or proposed program recovery areas under the said un-enacted Endangered Species Act, which by law grants territorial jurisdiction only; (1)\* and,

WHEREAS, program assumptions that the current recovery area can be accurately and legally defined as "federal public lands" and therefore subject to "federal jurisdiction" overlook the lack of required cession by the states to the federal government, and therefore the term "public land" is erroneously applied (here in both fact and legal definition and confers no federal jurisdiction).(2); and

WHEREAS, program actions fraudulently based on these assumptions of authority are in direct violation of many of the basic rights of the people affected including but not limited to:

- 1) Domestic Tranquility (i.e. protection from substantial continuous endangerment)
- 2) Right to Life, Liberty and Property
- 3) Right to Due Process in the deprivation of any person of Life, Liberty, or Property and for public use without Just Compensation ( Fifth and Fourteenth Amendments).

WHEREAS, an oath of office must be taken before any authority is granted to all civil service or uniformed service federal employees and this oath binds and REQUIRES each individual to swear that they ... "WILL SUPPORT AND DEFEND THE CONSTITUTION against all enemies foreign and domestic; that I will bear true faith and allegiance to the same; that I take this obligation freely, without any mental reservation or purpose of evasion; and that I will well and faithfully discharge the duties of this office..." but there is scant behavior evidenced in the program which indicates that many of the involved federal employees have taken, understood, or upheld their oath of office and thereby fraudulently assume the authority it grants to act at all. (3); and,

WHEREAS, program personnel acting in a manner alien and antagonistic to the protections of the Constitution are by definition a domestic enemy of the people; and,

WHEREAS, the above problems need to be aggressively and successfully addressed for the program to enter into a realm of legality deserving of program continuation, and a significant program structural revamp will be necessary; and,

\*see end notes

WHEREAS, according to the CEQ (Council for Environmental Quality) regulations which govern the NEPA process the program has failed to adequately address cumulative impact this must be addressed by future impact assessments according to the regulations and other aforementioned lawful requirements.

CEQ - Regulations 1508, Sec. 1508.7 Cumulative impact.

“Cumulative impact” is the impact on the environment [in this case impact on the economic, social and cultural ecology of the people specific to the recovery area] which results from the incremental impact of the action *when added to the other past, present, and reasonably foreseeable future actions* regardless of what agency (Federal or non-Federal) or person undertakes such other actions. *Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.* (my emphasis); and,

WHEREAS, in Sec.1508.8 Effects - of the above document, (effects and impacts are synonymous in these regulations) specifically mentioned as impacts to be considered (not separately but cumulatively with all other impacts of past, present, and reasonably foreseeable future actions) are cultural, economic, social, or health impacts, whether direct, indirect, or cumulative and impacts can result from actions which may have both beneficial and detrimental effects, even if on balance the agency believes that the impact will be beneficial; and,

WHEREAS, the above can be illustrated in an improper balance between wolf control and depredation/compensation where the never adequately compensated wolf depredations (due to impossibility of confirmation of the vast majority of wolf kills) when impacts are made more severe by less control equaling more uncompensated (and non-confirmed loss AND ever increasing negative impact on the economic ecology of the herding/grazing culture and the communities this culture supports.

WHEREAS, even the most casual mapping of the situation clearly indicates severe problems with recovery, and poor initial evaluation of the area as adequate for the 100 wolf population recovery goal, such as no core area for wolves to recover in (E. Bangs, Northern Rocky Mountain Wolf Recovery), and that this recovery can never work here (E. Bangs and S. Brecht, NRMWR) indicating the unique and sensitive recovery application which must be achieved and the substantial downsizing of expectations for population numbers necessary(4); and,

WHEREAS, the above lack of core area is a “prevalent dynamic” severely exacerbating the problems experienced cumulatively on the ground by the ungulate and agricultural land based cultural and economic ecologies here - through almost constant proximity and the resultant effect of increased habituation of the wolves, a **major problem** increasing endangerment, property losses and behavioral failure wolves; and,

WHEREAS, the problem of a continually developing culture of “no control” which has over time developed extremist attitudes in the public which have no understanding of the true

needs and considerations which the program must address, which David Mech warned over 10 years ago (5), has not been adequately ameliorated by less "wolf friendly" and more "people friendly" public outreach and education by the agencies involved as he suggested; and,

WHEREAS, too "wolf friendly" ideology within the program itself has led to misunderstandings and untruth passed onto the public causing the public to develop extreme, emotionally powerful misperceptions which endanger the people of the recovery area (Appendix A); and,

WHEREAS, it is questionable as to whether the federal agencies involved in wolf recovery are following their own rules - a specific instance might be **5 USC 553** which requires **NOTICE AND OPPORTUNITY** to be filed in the Federal Registry (see **44 USC 1505**) All rule making proceedings have to comply with **5 USC 556** and **5 USC 557**. Has the program **EVER** had a hearing before an Administrative Law judge as required by statute? Simply holding public meetings is **NOT** conforming to the Administrative Procedures Act at **5 USC 533, 566, and 557**. **When federal agencies don't follow the law they deny us "Due process of Law" and have "unclean hands in equity" which deprives the courts of jurisdiction over the subject matter** (Appendix B); and

WHEREAS, federal and state employees are personally liable for actions taken under unjustified authority adopted by the STATE (6);

**THEREFORE BE IT CONCLUDED** that the wolf recovery program needs to dig itself out of a pit of illegal misuse of the people impacted - through extortionate abuse of property and rights and by failure to adequately address many aspects of law, science and sociology, and that remedies must be addressed before such abuse is allowed to expand its illegally misused "territory".

Cc: to all related public agencies and legislators

December 31, 2007

Brian Milsap  
 State Administrator, US Fish & Wildlife Service  
 New Mexico Ecological Services Field Office  
 2105 Osuna, NE  
 Albuquerque NM 87113

Fax: (505) 346-2542

**Re: Notice of Scoping Meetings & Intent To Prepare Environmental Impact Statement & Socio-Economic Assessment for the Proposed Amendment of the Rule Establishing a Nonessential Experimental Population of the Arizona & New Mexico Population of the Gray Wolf ("Mexican Gray Wolf")**

Dear Mr. Milsap:

Request that the program provide for:

1. A development of a system to allow the full protection of people and all their private property from wolf attacks. Something must be done to let people protect their selves and their property from these killing machines. Specific language is needed to state a person may kill or injure a wolf if threatened by a wolf or in defense of another who is threatened, and may, kill a wolf that is not responding to harassment and is consistently in areas frequented by people.
2. The disclosure of the actual full social, cultural and economic impacts on rural residents and local governments to include the loss of tax revenue and increased government operation costs due to presence of introduced wolves.
3. Mitigate the full impacts to the pastoral communities and individuals affected by introduced wolves.
4. Conduct and provide information on a study and analysis of the food source other then pets and livestock for the wolves in all the area where the wolves might be.
5. Change the system to require the element of proof on a livestock/pet kill be placed on the agency to prove that it is not a wolf kill instead of on the individuals to prove that it is a wolf kill. It should be considered a wolf kill if there are wolf tracks or any other indication of wolves in the area unless there is concrete proof otherwise.
6. Discontinue of the practice of translocating problem wolves. There should be a prompt control, lethal and non-lethal, of problem wolves.
7. Improve the monitoring of the wolves and communications with all the residents within a one day traveling distance of the wolves that there are wolves, including which wolves, in the area. The people with wolves in their area should also be informed what they can do to protect their selves and their property from the wolves. There must be a system developed to allow people to protect them selves and their property.
8. The agency should have a complete and accurate PR campaign to provide complete factual information on all the problems to humans caused by the wolves. The general public is provided very little information from the agencies on all that is happening with the wolves. And this is a danger to people who might wish to visit the area for recreation. The general public is not prepared for what might happen in these areas.
9. The agency should be responsible for all cost of loss of livestock and pets and the cost required to protect the people, livestock and pets from the wolves.
10. Identify all effects the wolves might have in the area with the spread of disease to both wild and domestic animal populations. Isn't wolves one of the possible carriers of hoof and mouth disease?
11. An allowance in the rule for livestock owners or their agents may take (including kill or injure) any wolf engaged in the act of killing wounding or biting livestock on federally administered lands (see definition change) allotted for grazing anywhere within the Mexican wolf Experimental population area, including within the designated wolf recovery areas.

*Rachel Thomas*

Rachel Thomas  
 2135 N. Truman Road  
 Huachuca City, Arizona 85616

.....  
Brian Millsap, State Administrator  
U. S. Fish and Wildlife Service  
New Mexico Ecological Services Field Office  
2105 Osuna NE  
Albuquerque, NM 87113

Mr. Millsap,

I would like to take this opportunity to thank those involved in returning the Mexican gray wolf (Mgw) back to a viable, wild population. The long-term health of the entire ecosystem depends upon a balance between all species. The effect of removing the top predator from the southwest in the last century may not be known for a long time to come. The recovery effort is essential for maintaining all wildlife as a part of our national heritage.

I recently attended a "scopes" meeting in Tucson to learn more about the Mgw re-introduction program. I spoke to several biologists in attendance. I have followed up my education on this issue by researching both government and non-government websites. I find it disturbing that a USFWS biologist would state that historic numbers for the Mgw population to have been around 200. Although stated historic numbers vary, depending on source, it is safe to say she was off at least ten-fold, if not more. She also didn't know the distinction in the rules governing essential and nonessential experimental populations, but stated that there wasn't much difference. It leads one to wonder what other misinformation has been disseminated to the public.

The status of the Mgw should be changed to that of "endangered" species and awarded all protection safeguards. Given that current Mgw numbers are well below stated re-introduction goals, a change in status would ensure that this species is given the utmost safeguard against the various pressures being placed upon it. Allotment leasers should not be the judge as to whether an individual wolf is to be removed from the current population. Any "take" is a loss to the already strained genetic pool. If possible, Mgw managers need to keep all individuals in the breeding population, both captive and wild, in order to guarantee the greatest chance of genetic variability. Taking a wolf needs to be a last resort solution. The removal numbers of 52 wolves already exceeds any mathematically warranted number based on probable or confirmed depredations.

Limiting the Mgw range, also, does not send the message that everything is being done to re-establish this species. The wolf doesn't know boundaries, only habitat. As an expert at finding a niche, the wolf will let us know its range and carrying capacity. The managers could help out by working the education and political end of administering the wolf's return. Adhering to the USFWS's own mission statement, revised 12/12/07, would be a good guide.

We have an obligation to do whatever it takes in order to correct our near extermination of this animal. The true measure of our success will be reflected by how legitimate our effort has been. Thank you for your attention.

Paul Becklund

910 S. 3<sup>RD</sup> Ave. #5

Tucson, AZ 85701

.....

J. K. CHILTON & ASSOCIATES, INC.  
MEMBER NASD INVESTMENT BANKERS

DATE: 12-31-07

ATTENTION:

John Slown and Mr. Bryan Mullsap  
U.S. Fish and Wildlife Service  
New Mexico Ecological Services  
2105 Osuna Road, Albuquerque, NM 87113

FAX NUMBER:

505-346-2542

FAX MESSAGE

Comments from Arizona Cattle Growers' Association

Subject: EIS + Socio - Economic Assessment for the proposed Amendment of the Rule Establishing a Nonessential Experimental Population of the Arizona + New Mexico Population of the Gray Wolf ("Mexican Gray Wolf").

Also sent by email to:

[www.mexianwolfeis.org](http://www.mexianwolfeis.org)  
and

[R2FWEAL@fws.gov](mailto:R2FWEAL@fws.gov)

TOTAL NUMBER OF PAGES INCLUDING COVER SHEET IS: \_\_\_\_\_

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*Jim Chilton, Chairman  
Federal Lands Committee  
Arizona Cattle Growers' Association  
1401 N. 24<sup>th</sup> St., Suite 4  
Phoenix, Arizona 85008*

*Via Facsimile*

December 31, 2007

Mr. Brian Millsap, State Administrator  
U.S. Fish & Wildlife Service  
Ecological Services Field Office  
2105 Osuna NE  
Albuquerque, NM 87113

***Re: Comments on Notice of Scoping Meetings and Intent to Prepare an Environmental Impact Statement (EIS) and Socio-Economic Assessment for the Proposed Amendment of the Rule Establishing a Nonessential Experimental Population of the Arizona and New Mexico Population of Gray Wolf ("Mexican Gray Wolf")***

Dear Mr. Millsap,

On behalf of our membership, the Arizona Cattle Growers' Association (ACGA), I thank you for the opportunity to comment on the above-captioned action. At the outset, we first wish to point out to you that NEPA requires your consideration of all reasonable alternatives to this proposed action – including the analysis of termination of this program as an alternative to its expansion. (See: *Pacific Coast Federation of Fishermens's Associations v. National Marine Fisheries Service*, 482 F. Supp. 2d 1248 (W.D. Wash. 2007); *Hells Canyon Preserve Council v. U.S. Forest Service*, 2003 U.S. Dist. LEXIS 26581 (D. Ore. 2003); *Sierra Club v. Marsh*, 872 F.2d 497 (1<sup>st</sup> Cir. 1989)).

Here, the Fish & Wildlife Service is required by NEPA to evaluate termination of the introduction program for the "Mexican gray wolf" because substantial evidence exists that the animals being used for introductive purpose by the Service and its cooperators are not Mexican grey wolves but, rather, are, in fact, wolf-dog hybrids. According to Mr. Roy T. McBride, the foremost recognized expert on the Mexican wolf, the animals being used by the Service for introduction purpose are not "Mexican wolves" but are, in fact, wolf/dog hybrids. (See: McBride letter to Parsons, attached). Moreover, genetic analyses performed by researchers under contract with the Service and/or its cooperators, are inadequate to establish the genetic purity of these animals, contrary to the Service's allegations to the contrary. (See: treatments of captive lineages, attached).

On

you

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are

As a result, because the amendment proposed for EIS analysis here -- expansion of the areas into which the Service may release its captive-bred, alleged Mexican wolves -- raises substantial questions of irreversible environmental harm by its very real potential to compromise the genetic integrity of the entire gray wolf recovery program (See: Mc Bride letter, attached), the Service must consider termination of this program as a reasonable alternative to its expansion under NEPA.

In doing so, the Service must explain its reasons for taking the particular action it proposes within the context of the alternatives explored and evaluated. This means that, to remain in compliance with NEPA, the Service must provide the detailed information it has regarding the genetic integrity of the animals it wishes to introduce and guarantee that this information is made available to the public *before* preparing an EIS on this subject matter. (See: 40 C.F.R. Sec. 1508.18). Such information, however, remains unavailable at this point from the Service. Therefore, we hereby request receipt of all the information, detailed or otherwise, that the Service has regarding the genetic integrity of the animals it alleges, represents, and proposes to release as true "Mexican gray wolves" at your earliest possible convenience.

This information must necessarily include all reports, studies, publications and communications pertinent to the genetic integrity of the animals the Service is representing as pure "Mexican gray wolves," the names of the researchers who performed such work, the names of all entities and government agencies that funded any and all of the reports, studies and publications relied upon by the Service, and, a detailed explanation of the peer review process utilized by the Service to verify the conclusions reached. By necessity, the latter also includes provision of the names and affiliations of the persons who performed peer review of any of those genetic studies for the Service.

Second, expansion of the introduction zone for captive-bred, alleged "Mexican gray wolves" south of Interstate 10, as the Service proposes, will have substantial international implications, both socio-economically and environmentally, on the citizens and environment of northern Mexico. In particular, the citizens of both Chihuahua and Sonora stand to be particularly impacted by this proposal in substantial ways. Moreover, true, wild Mexican wolves also stand to be detrimentally and irreversibly impacted by the release of captive-bred animals south of I-10. As a result, input regarding this introduction proposal must be solicited by the Service at Scoping in order to remain in compliance with NEPA's intent.

Accordingly, and at the least, to be in compliance with NEPA, the Service must solicit input regarding this proposal from the various livestock growers, Ganadero Unions, and/or Cattle Growers' Associations of northern Chihuahua and northern Sonora immediately. Additionally, the input of our Ambassador to Mexico, as well as Mexico's Ambassador to us, must also be solicited by the Service at this point in the Scoping process to ensure that the purposes of NEPA are actually being served here.

Third, for the sake of brevity, we also incorporate by reference to herein the many, excellent comments submitted to you by Ms. Caren Cowan of the New Mexico



Cattle Growers' Association on this subject matter. Those comments, consistent with these, emphasize the need for the Service to fully comply with NEPA by evaluating *all* of the environmental and human community impacts its proposal here entails. By necessity, such evaluation also includes consideration of termination of this program as a reasonable alternative to expanding it.

Thank you again for the opportunity to comment on the Service's intent to prepare an EIS and Socio-economic assessment for its proposed amendment of the rule establishing a nonessential experimental population of the "Mexican gray wolf." We will be awaiting your prompt response to our request for the information specifically requested from you herein.

Sincerely,

Jim Chilton, Chairman,  
Federal Lands Committee,  
Arizona Cattle Growers' Association

cc: Mr. C.B. "Doc" Lane, Executive Director, Arizona Cattle Growers' Association;  
Ms. Caren Cowan, Executive Director, New Mexico Cattle Growers' Association

Sincerely,  
  
Jim Chilton  
Chairman  
Federal Lands Committee  
Arizona Cattle Growers' Association

Arizona Cattle Growers' Association

cc.: Mr. C.B. "Doc" Lane, Executive Director, Arizona Cattle Growers' Association;  
Ms. Caren Cowan, Executive Director, New Mexico Cattle Growers' Association

10/16/07

10/16/07

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10/16/07

10/16/07

Attn: Mexican Gray Wolf NEPA Scoping  
Brian Millsap  
State Administrator  
US Fish and Wildlife Service  
New Mexico Ecological Services Field Office  
2105 Osuna NE  
Albuquerque  
New Mexico  
87113

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DEC 31 2007

USFWS-NMESFO

*Comments:*

*My husband and I attended the public consultation in Flagstaff on 27 November 2007. I met with several USFW employees, a wildlife ranger dealing with rogue wolves and a representative of the native American reserve. I felt overall the attitude to wolves was positive and that they themselves felt much more needed to be done to help wolves recover, and that it should be done. I list my comments under the following headings:*

*Wolf Territory; Benefit to the Environment; Compensation to Farmers; Stance by USFWS; Rogue Wolves; Rule Changes; My Responsibilities.*

- 1. Wolf Territory: this needs to be extended forthwith to allow wolves to regulate their own numbers in the wild. That is, much less 'management' and more 'management by nature' allowing the wolves to recover. Do not relocate wolves that move outside the designated territory by not having geographically excluded areas. Relocation is currently very disruptive to wolf recover. Allow more releases of captive wolves into the BRWRA allowing greater opportunities for self-sustainability.*
- 2. Benefit to the Environment: improvement in wolf populations over a more extensive area will allow greater natural predation of wild grazing animals and allow vegetation to recover. It will also curb coyote predation of small mammals.*
- 3. Compensation to Farmers: where predation occurs of farm animals (the wolf cannot be expected to know the difference) then wolf deterrent practices should be encouraged (or mandatory) by the USFWS and compensation offered to farmers providing the basis to tolerance by farmers of the wolves.*
- 4. Stance by USFWS: it is important that the USFWS makes it clear to the public that wolf recovery is the USFWS policy because they are important to the ecology/environment and the preservation of 'wilderness' in America/Arizona. The wilderness is not a theme park, controlled and made for human entertainment, it offers a different experience of the wild/nature, and needs to be preserved as such for current and future generations. The wolf is an important species and its reintroduction and federal protection*

will prove the case of the USFWS ability to keep the wilderness wild and promote species recovery.

5. Rogue Wolves: Have 'no-kill' rule/policy. The sanctuaries (Wildlife NGO's) of which there are many will always take the wolves. Currently too many are being killed but we the public fund charities to save every wolf. A comment by one USFWS representative to me was why should every rogue wolf be saved? I answered that we give money to sanctuaries to save every wolf and maximise the life of every wolf. Thus, the so-called Wildlife Service who currently kill rogue wolves should be stopped, with only capture and re-release or placement in sanctuaries the rule/policy. To me this shows respect of the animals themselves and those willing to provide them sanctuary.
6. Rule Changes: to achieve some of the suggestions in 1-5 there should be an endangered species designation to give wolves greater protection; boundaries should be extended; more wolves should be introduced; dead livestock should be moved to reduce incidence of 'rogue wolves'; the recovery plan should be revised to maximise wolf recovery options which are currently insufficient as wolf numbers decline; there should be more federal funding and working more closely with NGO's to maximise wolf recovery efforts.
7. My Responsibilities: keep my dogs on leashes and penned by the house to ensure dog control; keep my toddlers close on hikes and the dogs on leashes. I back onto the National Forest Service to two sides of my property where there are plenty of coyotes around and who come infrequently into my back yard. I take responsibility because I know I back onto Forest Service land and I expect the presence of wild animals and take suitable precautions. I believe people should take responsibility for their domestic animals (I keep my cats indoors) if they live in or next to the wilderness.

Deborah and Howard Davies  
155 Stations West Drive  
Sedona  
Arizona  
86336



December 27, 2007

Brian Millsap  
State Administrator  
U.S. Fish and Wildlife Service  
Ecological Services Field Office  
2105 Osuna NE  
Albuquerque, NM 87133

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DEC 31 2007

USFWS-NMESFO

Fax (505)346-2542  
Email: [R2FWE\\_AL@fws.gov](mailto:R2FWE_AL@fws.gov)

RE: Notice of Scoping Meetings and intent to prepare an Environmental Impact Statement (EIS) and Socio-Economic Assessment for the Proposed Amendment of the Rule Experimental population of the Arizona and New Mexico Population of Gray Wolf, ("Mexican Gray Wolf").

Dear Mr. Millsap:

We would like to comment on the above referenced scoping process. As residents of New Mexico, I am writing to express the following concerns I have with these proposed amendments.

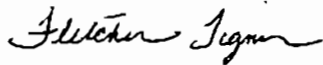
- The issue of human safety must be addressed. Wolves that stay around homes and communities threatening children, harming pets and killing livestock should not be allowed to remain in the program and should be dealt with immediately.
- The continue feeding of wolves by U>S> Fish and Wildlife Service and Game and Fish personnel should not be allowed to persist. Although it may alleviate a short term problem, it in turn only creates a bigger and longer problem with habituation.
- The current method of determining depredation does not adequately capture the true amount of harm and cost being done.
- Depredation on domestic pets on private, public or Tribal lands needs to be adequately addressed and effective remedies need to be available to protect private individuals.
- Depredation on domestic pets on private, public or Tribal lands needs to be adequately addressed and effective remedies need to be available to protect private individuals.
- A compensation and interdiction program managed by livestock producers themselves needs to be created to address the real cost of the losses individuals are experiencing.

Boundaries should not be expanded until this program can show some type of success nor should it be considered at this time.

- Carcass removal by livestock operations is not a realistic option, nor can its effects be proven at this time.
- The removal of problem wolves through lethal means needs to remain an option.
- Diseases carried by wolves that are harmful to humans and domestic livestock need to be addressed.
- Research needs to be done on wolves by land grant universities that are unbiased and have the resources to do so.

Thank you in advance for your attention. We look forward to an EIS that addresses the real concerns, true costs and negative impacts to those rural communities that are within the program boundaries.

Sincerely,



Fletcher Tigner  
PO Box 151  
Valley Farms, AZ 85291  
(480)747-4370

--

DEBORAH K. GALE  
County Administrator \*(928) 865-2310  
Clerk of the Board \*(928) 865-2072  
  
FACSIMILE # (928) 865-4417



DONALD R. STACEY  
District 1  
  
HECTOR RUEDAS  
District 2  
  
DIXIE L. ZUMWALT  
District 3

BOARD OF SUPERVISORS  
P.O. BOX 908  
CLIFTON, ARIZONA 85533

**DATE: December 31, 2007**

**NUMBER OF PAGES:  
(INCLUDING THIS PAGE) 4**

**FAX NUMBER: 505-346-2542**

**TO: Mr. John Slown  
U.S. Fish and Wildlife Service**

**FROM: Deborah K. Gale, Greenlee County Administrator**

**RE: Comments on the proposed change for the 10j Rule  
regarding the Reintroduction of the Mexican Gray Wolf**

**COMMENTS:**

DEBORAH K. GALE  
County Administrator \*(928) 865-2310  
Clerk of the Board \*(928) 865-2072  
  
FACSIMILE # (928) 865-4417



BOARD OF SUPERVISORS  
P.O. BOX 908  
CLIFTON, ARIZONA 85533

DONALD R. STACEY  
District 1  
  
HECTOR RUEDAS  
District 2  
  
DIXIE L. ZUMWALT  
District 3

December 28, 2007

Mr. John Slown  
U.S. Fish and Wildlife Service  
New Mexico Ecological Services Field Office  
2105 Osuna NE  
Albuquerque, New Mexico 87113

RE: Comments on the proposed change for the 10j rule regarding the Reintroduction of the Mexican Gray Wolf

Dear Mr. Slown:

These comments are made on behalf of the Greenlee County Board of Supervisors. Greenlee County is the home of the Blue Range Wolf Recovery Area which is the primary release zone for the reintroduction program, and, therefore, has a vested interest in the program. The County has consistently been opposed to the reintroduction program for a variety of reasons. Greenlee County decided to become a member of the Adaptive Management Oversight Committee (AMOC) in order to have input in the management of the program. We felt that it was important for the County to be a member to help bring a balance to the program. We have continued to encourage other counties in Arizona and New Mexico to join the AMOC and have worked with local ranchers and residents to bring their issues to the table for resolution. The County continues to have serious concerns about the program and will address those in these comments.

Greenlee County is a supporter of multiple use for public lands. The reintroduction of the Mexican gray wolf should not have significant impacts on another use of the land. In the past nine years, it has been detrimental to the ranching industry. The timber industry was decimated in our county at the expense of the Mexican spotted owl. We are now seeing the same effects on another industry in our county. This is not multiple use and is not in the best interest of all of the citizens of Greenlee County.

At the onset, we were concerned that the primary release area could not sustain the "100 wolf" target number. A few release sites have been used on multiple occasions and are constantly putting pressure on local ranchers and residents. However, the county does not suggest expanding the boundary. Currently, the program is seriously underfunded which affects every aspect of the program. Expansion of the boundary would put more burden on the current resources available.



initial releases are an issue. Allowing for initial releases in the Gila Wilderness (secondary release zone) should be carefully considered instead of just translocations or allowing dispersing wolves in that area. However, the County does not suggest that the program allow dispersing wolves to remain outside the primary or secondary zones. Again, with the limited resources available, this would put a strain on the program that would make it even more ineffective and inefficient.

The harassment of wolves by alternative means is necessary. Methods that are successful should be allowed to prevent the need to remove a wolf that becomes a nuisance. By allowing local residents to use alternative methods such as rubber bullets may prevent depredation incidents.

The lethal take of a wolf, if necessary, in the protection of a domestic pets should be legal. This should include livestock.

If the definitions of "breeding pair, depredation incident, and threshold for permanent removal" need to be clarified, they should be addressed by AMOC in modifying the current standard operating procedures (SOP's). The County requests that the SOP's be given the opportunity to work. A tremendous amount of deliberation went into the development of the procedures and we feel that AMOC should be the level at which this should be addressed. The rule should provide enough latitude to allow AMOC to manage the program and not be constrained by rules that take up to four years to change.

The success of the program is at a crossroad. The County proposes the following:

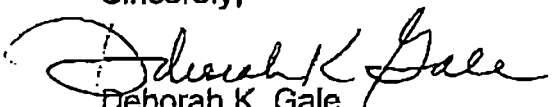
- 1.) No expansion of the current boundary as previously established.
- 2.) Consideration of initial releases in the Gila Wilderness should have a thorough review. Initial release sites should be in areas that are as far away from residences and/or communities as possible. Convenience for the release should not be one of the issues in making the decision on the sites. We understand the limitations on the staff but the wolves should be placed in areas where there is the potential for as little human or domesticated animal interaction as possible. A realistic review of the prey base should be an ongoing process. Determining whether the recovery area can sustain the goal of 100 wolves should be carefully reviewed.
- 3.) Wolves that disperse outside of the boundary should continue to be captured and translocated or lethally removed.
- 4.) Use of various alternative methods for harassment of wolves should be implemented. Residents in the area should be provided with the means to use non-lethal force.
- 5.) Allow for the lethal take of a wolf that is attacking a domestic pet.

- 6.) Immediately implement an interdiction and compensation program that compensates ranchers for the true cost of the financial impacts. This should include costs for feed, moving of cattle, range riders, and other related expenses. Congress should pass the enabling legislation as well as the appropriation of a minimum \$5,000,000 for an endowment fund. The program set up by the Defenders of Wildlife was commendable but is not sufficient nor is it geared toward compensation of true costs of the program to the ranchers that have suffered losses. The Forest Service should be required to work with ranchers on their grazing plans to allow for the movement of cattle to prevent possible depredation incidents. This type of program would go a long way in achieving the goals of the program.
- 7.) All agencies tasked with the management of the program should have sufficient budgets to allow for adequate personnel and other resources necessary. The County was concerned from the beginning that the program would not be adequately funded and this has proven to be true. This is a federal program and should be funded by the federal government. State agencies that are involved should be compensated for the cost of the program. If the federal government chooses not to fund the program at an adequate level, then the program should be terminated.
- 8.) Human health and safety should always be the number one priority. Regardless of how the wolf was removed by past practice, the reintroduction program has to recognize that people and domesticated animals reside in the area chosen for the reintroduction. To think that there is not going to be human/wolf interaction is ludicrous. Also, to think that the local residents should have to suffer through financial, emotional, and other social impacts as collateral damage to make the program a success is also ludicrous. The local residents should always have a voice and a realistic resolution to the damages they suffer.

If these simple steps are not implemented, then the only resolution is to determine that the reintroduction of the "non-essential, experimental population of the Mexican gray wolf" be discontinued.

Please feel free to contact me at 928-865-2310 or [kgale@co.greenlee.az.us](mailto:kgale@co.greenlee.az.us) should you have any questions about these comments.

Sincerely,

  
Deborah K. Gale  
Greenlee County Administrator

John Slown, USFWS  
New Mexico Ecological Services Field Office  
2015 Oguna Road  
Albuquerque, New Mexico 87113

January 1, 2008

Mr. Slown,

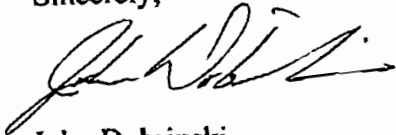
Yesterday, I was informed of the proposed decision of the USFWS to introduce wolves to the Anderson Mesa area of Coconino County, Arizona. Please consider this letter as notification of my strong opposition to this action.

Please respond to the following questions.

- (1) Local residents and permitted Federal and State land users who will be directly affected were not notified of this action until the close of the comment period on December 31, 2007. Why hasn't there been any sufficient notification prior to the close of the public comment period?
- (2) The Anderson Mesa area is one of the last remaining Pronghorn Antelope habitat areas in Northern Arizona and has experienced severe detrimental impacts from overpopulation of coyotes and eagles. Significant amounts of time and money have been spent to try to sustain this population and to introduce wolves to this area is sure to result in the demise of the existing antelope herd. What prompted the decision to introduce wolves into this area?
- (3) Local ranchers are already struggling with severe drought and difficult economic conditions. What protection will any permitted Federal and State land users have against wolf depredation on cattle and sheep in this area?
- (4) Recent introduction efforts in Southwestern New Mexico have been entirely unsuccessful from both environmental and financial positions yet continue to be pursued. With similar habitat conditions in this area when was any environmental impact and economic analysis of the Anderson Mesa area completed and what were the results of that analysis? If an analysis was completed, please provide a copy.
- (5) Rumors abound that wolves have already been introduced in this area and are suspected to be hybrid animals introduced by ill intentioned wolf proponents. Sightings have occurred although cannot be verified. If the USFWS does introduce wolves what guarantees are going to be made that the hybrid wolves will be eliminated prior to introduction of genetically pure wolves?

As a permittee on National Forest Lands adjacent to the Anderson Mesa area I did not receive any notification. Please provide a list of organizations and individuals that were notified and place my name on any future notifications regarding any proposed actions in this area. I am anticipating a timely response to the above questions and requests.

Sincerely,

A handwritten signature in black ink, appearing to read "John Dobrinski". The signature is fluid and cursive, with a prominent initial "J" and a long, sweeping underline.

John Dobrinski  
HC 31 Box 360  
Mormon Lake, Arizona  
86038

1/3/2008

John Slown  
U.S. Fish & Wildlife  
New Mexico Ecological Service  
Field Office  
2015 Osuna Rd.  
Albuquerque, N.M. 87113

Sir,

It has come to my attention that it is likely that wolves will be released on or near Anderson Mesa in Northern Arizona. This area is very close to Flagstaff, and I am worried that this is not the best area to release wolves. The Anderson Mesa area is very well known and advertised as a great hiking area and brings in people from all walks of life for its trails. Also, this area is very close to several ranches. I am also worried about the antelope and deer herds in this vicinity. Antelope and deer have been fewer and farther between, and I am afraid the wolves could decimate the small herds in no time. Please rethink this proposal. There must be better areas for the program that will not adversely affect the antelope, deer, cattle and human populations around Flagstaff.

Thank you for your time and consideration.

Sincerely,

Margaret D. Goode  
P.O. Box 657  
Cornville Az. 86325

Dear Sirs,

We have signed the below petition  
to show our support for the gray wolf. Please  
GET THE MESSAGE!

LUCIENNE GOLD  
KATHY VAZQUEZ

*Lucienne Gold*  
*Kathy Vazquez*

4840 N ALICIA  
TUCSON ARIZ 85701

1813 ALLEN  
TUCSON AZ

JOE GOLD

*Joe Gold*

4840 N ALICIA  
TUCSON ARIZONA  
85705

ANNA BARTON

*Anna Barton*

11416 205th St  
LAKewood, CA 90715

*Joel Barton*

11416 205th St  
LAKewood, CA  
90715

John Sloan  
U.S. Fish and Wildlife Service  
New Mexico Ecological Services Field Office  
2105 Osuna NE  
Albuquerque, NM 87113

Re: Notice of Scoping Meetings and Intent To Prepare an Environmental Impact Statement and Socio-Economic Assessment for the Proposed Amendment of the Rule Establishing a Nonessential Experimental Population of the Arizona and New Mexico Population of the Gray Wolf ("Mexican Gray Wolf").

Dear John Sloan

The following are my comments regarding the proposed amendments.

(a) Allowing wolves to establish home ranges outside the the BRWRA would definitely expand the problems people in the BRWRA have to all of the MWEPA. Based on wildlife populations, livestock depredations, pets killed and habituation to humans, maintaining a wolf population of 100 does not appear to be a reasonable goal. The target for a viable population should be reduced at least by half. The only other solution is to allow more aggressive harassment and lethal take by the people being impacted by the problem wolves.

(b) Again, expanding the release area only expands the problems for the human inhabitants. A smaller target population should be considered.

(c) No comment.

(d) All alternatives should be explored. However, if harassment does not work, removal or lethal take should also be an option for the individual(s) involved as well FWS. An article in the "New Mexico Stockman" Titled Livestock losses decline as feds kill off wolves., indicated that the number of cattle killed by wolves in Wyoming dropped from 123 in 2006 to 44 in 2007. The reduction in depredations was attributed to a more aggressive approach removing the problem animals by lethal take. This action is benign to wolves that are not a problem. Thereby enhancing the chances of wolves exhibiting acceptable behavior to survive. Removal or lethal take should be implemented after the first depredation incident. It is obvious that once a wolf exhibits this behavior, it cannot be be changed.

(e) This rule must be changed. Many dogs owned in the affected area are valuable working, guard or hunting dogs. Wolves that attack and kill dogs on private property or while working on public land must be permanently removed. The situation can only become more dangerous for the owners. Allowing take must include "lethal take" for the protection of humans and their property. If a human is in the vicinity where the incident is

taking place, it must be assumed the person's life is also in danger. The person should be allowed to use lethal take to protect human life and his property.

(f) "Depredation Incident" Common sense would dictate that one depredation incident be classified as one animal taken. Not one incident with one or more animals killed. The owner's loss is not based how many incidents occur but the number of animals (cows, horses, sheep, etc.) killed. It is imperative that persons responsible for verifying a depredation incident respond in a manner that will not unduly burden the livestock owner. Response by DOW and/or the NM FWS Must be within a time frame that verification of the kill is possible. Minnesota has a much more reasonable policy in regards to depredation. The Minn. Plan allows calves missing to be confirmed as wolf kills under certain circumstances.

"Threshold for Removal" Wolves exhibiting fearless behavior or those becoming habituated to humans and posing a non-immediate but demonstrable threat to human safety should be harassed. If the initial act of harassment is not successful, the wolf(s) should be removed or humanly dispatched by the USFWS, other federal land management agencies, state or tribal conservation agencies, or designated agents of those agencies. This is to include provisions for a federal take permit, for local, county law enforcement personnel. To allow them to lethally take a wolf to enable immediate protection of human safety.

"Livestock carcass management and disposal" Most if not all grazing allotments in the reintroduction area cover a very large area and includes rough and uneven terrain. Much of it is inaccessible by regular means of transportation. Inspecting livestock on a regular basis is often not practical for the rancher. Even if a carcass is discovered, the rancher may not have the means to remove or bury it. Equipment access, weather conditions (frozen ground, snow, wet unstable ground, etc.) may preclude the rancher from any access to the carcass for days, weeks, or longer. Burying or removing a carcass requires heavy equipment. Many ranchers do not own or have the means to purchase the equipment. But most of all, recent studies have been unable to find a link between carcass disposal or lack of carcass disposal and wolf depredation. The University of Minnesota conducted a study in 1999 to determine if ANY livestock management practices could prevent wolf predation. Ref: Assessing Factors That May Predispose Minnesota Farms to Wolf Depredations on Cattle. L. David Mech, Elizabeth K. Harper, Thomas J. Meier, William J. Paul *Wildlife Society Bulletin*, Vol. 28. NO. 3 (Autumn. 2000), pp. 623-629. The study could find no management practices certain to prevent wolf predation. The only method proven to prevent wolf predation was to remove the deprecating wolves from the farm. Additional credence to this conclusion is corroborated by an excerpt from an email from Ed Bangs 09/01/06 to other wolf managers in the Mexican Wolf Program referring to a call from a reporter concerned about livestock carcasses attracting wolves. He said in part " I thought the idea that wolves eat a cow, think beef tastes great, and then



start attacking cattle is mythology- as eating carrion and killing prey or two totally different wolf behaviors. Wolves often scavenge all they can. However, I do think that having a bone pile next to calving pasture can increase potential for conflict by attracting wolf activity in the vicinity of livestock [research shows cattle near wolf dens are more likely to be the ones attacked simply because level of wolf activity and interacting with livestock is highest there] and that anything that helps wolves become more familiar with livestock can increase the chance they might test them as prey. But normal range practice out here makes it nearly impossible to find and bury [or blow up for human safety concerns as they do for G. bears issues and livestock carcasses along trails] every carcass so if livestock carcass disposal is within 'normal' and traditional livestock husbandry practices we don't consider them an attractant that we would withhold wolf removal. We do advise ranchers to not have a bone yard next to livestock and we have removed carcasses in pastures to prevent wolves from coming back into concentrated livestock to feed on their kills. But feeding on livestock carcasses is a very different thing than attacking livestock- one doesn't necessarily lead to the other."

(g) (a) No comment

(g) (b) No comment

(g) (c) I reiterate, Wolves that exhibit fearless behavior or those becoming habituated to humans and posing a non-immediate threat to human safety should be harassed or humanely dispatched by USFS, other federal land management agencies, state or tribal conservation agencies, or designated agents of those agencies. This is to include provisions for a federal take permit for local, county law enforcement personnel, to allow to lethally take a wolf to enable immediate protection of human safety. The State of Minnesota has a similar plan.

(g) (d) No comment

(g) (e) ???

(g) (f) Using hunting permits by numbers issued and and by sex are affective means of wildlife conservation. Hunters may take only what the FWS allows them to hunt. Therefore, FWS may vary the amount and type of permits issued to increase or decrease the species population. Big game populations (mainly deer and elk) are being adversely affected by the wolves. Reintroduction advocates claim that wolves cull the old and weak. There is also evidence that the elk calves and cows are targeted during the birthing process and often are left to die a slow death while the wolves pursue more prey. Wolves are indiscriminate killers. Under the current rules, there is little FWS can do to if the game

animals are in decline other than reduce the number of hunting permits issued. This could prove to be a huge problem if the wolf population is allowed to grow.

g) (h) There are very few economic opportunities in Catron county at this time. Logging and ranching were the major economic engines with hunting also making a major contributor. Logging was stopped with the listing of the Spotted Owl. Ranching is under siege from many sources including the reintroduction of the Mexican Grey Wolf. Tourism was touted as the new economy for this area. Obviously that has not happened. Ranching could coexist with a limited amount of wolves if the rules were changed to reflect the reality of the situation. All people and especially ranchers need more flexibility to deal with the wolves in order to survive. There are 300 wolves in captivity. There is no danger of the Mexican Gray Wolf becoming extinct. Reason dictates to remove the undesirable wolves as soon as possible and leave the ones that exhibit acceptable behavior.

(g) (l) No comment

#### Additional comments

If the general populace had to live by the same rules that the citizens of Catron county and south eastern Arizona, the Mexican Wolf Reintroduction Program would have been stopped long ago. I will make a hypothetical analogy to substantiate my point. The endangered species act applies to all of the U.S. and its territories. However, urban areas seldom if ever feel the direct, negative impact of the ESA. Suppose an endangered snake or a mouse or even an insect reestablishes in the back yard of a residence in an existing subdivision of a major city. This was once the habitat of this species. It is determined by the governing agency that certain activity (mowing grass, outdoor cooking, children playing) may harm or disturb the ESI. Consequently, the owners can no longer use the back yard or do anything that may harm the ES. Their ability to sell the property is greatly reduced, they still have to pay taxes and eventually have to move from their property because it is no longer functional as a home. A short time later, the reintroduction area is expanded to accommodate a growing ES population. Subsequently the entire subdivision and eventually the whole city is classified as critical habitat and sever restrictions are placed on all of the property owners. Of course the general public would never allow the situation to progress to that level when they are directly affected .But, it is OK for some people i.e. small rural populations, to loose the ability to use and protect their private property and make a living. The population most intimately involved cannot be expected to bear the majority burden in an unreasonable manner. My point is one that has been made by others may times. Make the program benefit to all parties involved and the species will thrive. It is the ONLY way the program will be truly successful.

Also, there is some evidence that up to 27 wolves born wild, are established in New Mexico. These wolves do not appear to be harming livestock or exhibiting any other unacceptable behavior

towards livestock or humans. Apparently, FWS has not investigated the situation. Why not? It would be great news that people on both sides of the issue would regard as positive. In my opinion, the rules and administration of the MW reintroduction do not adequately address the issues of the wolves or the people most affected by their presence. I reiterate, for the program to work, it must be a win win situation. If the goal truly is to successfully reintroduce the Mexican Gray Wolf, FWS must cooperate with and have the support of the local citizenry.

In conclusion I would like to commend Mr. Morgart Mexican Wolf Coordinator. My wife and I attended the scoping meeting in Thatcher AZ. Dec. 6<sup>th</sup>. We discussed the program in detail for almost two hours. He answered all of our questions in detail and without bias. He represents your office well.

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