

Mon, Sep. 17

U.S. Fish and Wildlife Service: —

I commend any action to preserve
land or species endangered by
human invasion, other than necessity.
Ranchers have too long held sway, and
I want to add my voice to the contin-
uation of the wolf program.

Sincerely,

Sonya K. McLean

4332 N 23 Pl.

Phonix Az 85016

And I know I echo the sentiments of
our eight adult children, — all born
and raised in Phoenix. Their
father inculcated in them the love of
nature and all it encompasses.

Bobbie Holaday
1413 East Dobbins Road
Phoenix, AZ 85042
Phone: 602 268-1089
azwolflady1@cox.net

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NOV 13 2007



USFWS-NMESFO

October 24, 2007

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:

Thank you for the opportunity to comment during the scoping period for a draft environmental impact statement (EIS) and socio-economic assessment and a proposed rule amendment to the 1998 rule that authorized the establishment of nonessential experimental population of Mexican gray wolves in Arizona and New Mexico. With all due respect to the current request from the Sierra Club for all members to request altering this classification to full protection of these wolves, I do not support such a change. This request exhibits a lack of understanding that the limitations of the full protection category would make reasonable management of the released wolves impossible. Despite their idealistic theory of full protection, the resulting restrictions would run counterproductive to progress toward the desired self-sustaining population of 100 wolves.

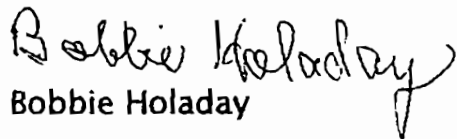
My other comments are mainly based on the recommendations found in the Mexican Wolf Blue Range Reintroduction Project 5-Year Review of the Adaptive Management Oversight Committee Recommendations Component.

I was glad to see most of these issues discussed in the Department of the Interior notice of the public scoping meeting under Issues Related to the Scope of the NEP. I refer to item (a) concerning the change in the 1998 NEP final rule that would provide the Service with the authority to allow wolves to establish territories outside the boundaries of the BRWRA; item (b) that would change the 1998 NEP final rule to provide the Service the authority to release Mexican gray wolves from the captive breeding population into New Mexico; and, item (c) that would discontinue consideration of the White Sands Wolf Recovery Area as an independent recovery area. I recommend that all of these issues be implemented and so documented in the EIS. In addition, I concur with the recommendation of the Center of Biodiversity report that call for requiring livestock operators to dispose of livestock carcasses so that wolves do not become habituated to feeding on livestock.

I call your attention to recommendation 12 in the above mentioned AMOC review, and ask that the EIS requests AMOC to develop a "Federally, State, and/or Tribally-funded incentives program to address known and potential economic impacts of wolf nuisance and livestock depredation behavior on private, public, and Tribal Trusts lands." I will not quote the entire AMOC review item here, but recommend that such an incentives program be established that would encourage the local people affected by wolf behavior to be more accepting of their presence.

I have recommend that the socio-economic assessment take into consideration the proven financial benefits from the influx of tourists and wildlife watchers to areas such as northern Minnesota and Yellowstone because of the presence of wolves. I look forward to reviewing the EIS that will follow the scoping the session.

Sincerely,


Bobbie Holaday

✓
/

November 29, 2007

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

Reference: Mexican Gray Wolf NEPA Scoping

Dear Mr. Millsap:

I am writing in regard to any changes make that will determine the future of the Mexican Gray Wolf in Arizona and Mexico. This is an opportunity to save the gray wolf from extinction. As you know, humans have moved onto land that has fed and sheltered the wolf. We need to share our space and make it so all creatures flourish. "It's a matter of taking the side of the weak against the strong, something the best of people have always done." Harriet Beecher Stowe

Best regards,

Linda Frye

Linda Frye
2921 E Bighorn Ave
Phoenix, AZ 85048

✓ Attn: Mexican Gray Wolf
NEPA Scoping

11/21/07

Mr. Brian Millsap,
State Administrator
U.S. Fish and Wildlife Service
New Mexico Ecological
Services Field Office
2105 Osuna NE
Albuquerque NM 87713

CEIVE

NOV 26 2007

NOV 26 2007

Dear Mr. Millsap:

I urge you to find a way of
integrating the Mexican Gray
Wolf into the wilderness
ecosystems of Arizona and
New Mexico.

A healthy wilderness ecosystem
demands the inclusion of it's
top predator in healthy
numbers to keep the system
in natural balance.

It is man who needs to learn
to live in harmony with nature
and accept an occasional wolf
killing.

I hope you will decide on an
enlightened policy to ensure
a healthy wolf recovery.

1633 E. Rose Lane
Phoenix AZ 85016

Sincerely,
Linda Fadem

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NOV 23 2007

BARROW

Neurological Institute®

Nov. 19, 2007

Dr. Thomas Gilmore
2211 Tanto Ridge Road
Prescott, AZ 86305-3939

Dear MR. BRIAN MILLSAP —

I AM TAKING MY TIME TO WRITE SO YOU MAY INCLUDE MY COMMENTS WITHIN THE VERY IMPORTANT MEXICAN GRAY WOLF SCOPING CHANGE PROCESS... SINCE THIS COULD DETERMINE THE FUTURE OF THE ANIMAL IN MY ARIZONA AND NEW MEXICO.

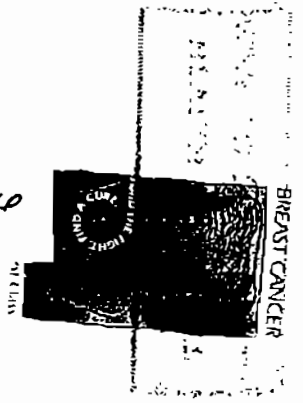
I totally support WOLF Recovery BECAUSE IT HELPS CORRECT OUR HUGE ECOLOGICAL MISTAKE OF OUR PAST & MAY HELP US ALL FIND A SUSTAINABLE FUTURE BY PROTECTING HABITAT, trees, WATER, OPEN SPACES.

Barrow Neurological Institute®
St. Joseph's Hospital and Medical Center
CHW

350 West Thomas Road
Phoenix, AZ 85013-4496
(602) 406-3000 (General information - In state)
(602) 406-3067 (Conference information)
(800) BARROW-1 (227-7691) Out of state
Web address: thebarrow.com

THANK YOU -
Dr. Tom Gilmore
11-19-07

ring



✓
November 24, 2007

NOV 28 2007

Dear MR. Mill Sap,

TWS-NMFC

I'm taking the time to write this letter to you during this busy yet again holiday season. For you see MR. Mill Sap each year that goes by since the current administration has taken office - more & more assaults towards this country's magnificent wildlife are being heinously crafted and I for one along with many other individuals are furious that we as tax paying citizens that indirectly fund these attacks have to continuously beg for it to stop.

I was born into a world with these beautiful creatures in it and I hope to die with these beautiful creatures still in it.

I shudder to imagine a world with nothing but humans & concrete.

The Mexican Wolf is more than entitled to be here just as we humans as ordained by OUR MAKER.

Stop the slaughter of our God given wild life. If the almighty

saw fit to create these animals than thus shall they be.

To destroy them in an attempt to appease a bunch of crony ranchers, loggers, oilmen and the like would be a heinous crime against nature and heinous insult to the Almighty.

I vote yes to all of the wildlife in this country and world for that matter as to live in a world/land without them would be eerily sad, empty and barren.

SAY YES to Wolf Recovery in NM & AZ.

Respectfully,
Jona La-Schiava
JONA La-Schiava
1602 EAST GARDENIA AVE
Phoenix, AZ 85020

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 relocated 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

John Slown
NMESFO



Maricopa Audubon Society

4619 EAST ARCADIA LANE • PHOENIX, ARIZONA 85018

Dec. 3, 2007

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

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DEC 19 2007

USFWS-NMESFO

Dear Brian Millsap:

On behalf of the 2300 members of the Maricopa Audubon Society here in central Arizona, we wish to comment on the scoping phase of the rulemaking regarding the Mexican Gray Wolf Recovery Program.

Our members consider keystone predators such as the Mexican Gray Wolf most important in the ecology of the Southwest. Our members have participated in field trips in Greenlee County and the Apache Sitgreaves and Gila National Forest over the past many years and decades. The P-J, ponderosa, mixed conifer and boreal life zones of the forests of those regions have precious and unique wildlife that deserve protection along with that keystone predator, the Mexican Gray Wolf. Hannigan Meadows, Escudilla Peak etc. have been among the destination points for our nature study trips in the area as well as the many other forested areas in the A/S and Gila National Forests.

A great nation should be able to protect endangered species within its borders. Wolves are a vital lynchpin species which determine the health and diversity of the plants and animals in this landscape.

Wolves protect riparian habitats by preventing the removal of streamside vegetation cattails, willows etc. by herbivores. Uplands are protected from overgrazing and abuse by grazing and browsing wildlife species. The health of both riparian and non riparian landscapes and their animals and plants depend upon keystone predators like wolves.

Without predators deer and elk over-browsing could erode upland topsoil, create gullies, and cause deep eroded canyons and, as just mentioned, destroy vital riparian habitats. Wild predators are the keystone of a balanced ecosystem.

Likewise, wolves balance and control coyote populations.

Tragically little remains today of the wild species in the Southwest whether it was wolves, jaguars, or grizzlies.

Regarding specific comments on the upcoming rulemaking of the wolf introduction program:

Include a “Conservation Alternative” that will change the classification from “experimental, non-essential” to “experimental, *essential*” or “endangered” to give wolves more protection. They are not being recovered under the existing classification.

The Blue Range population of Mexican gray wolves is essential to long-term recovery of this endangered subspecies; captive populations will not safeguard Mexican wolves from extinction in the long-term. An “essential” or an “endangered” designation will give these wolves the stronger protections they need to succeed in the wild. Congress provided for “experimental, essential” as a classification, yet it has never been used by the Fish and Wildlife Service. If ever a case can be made for the first ever designated “essential” experimental population, this is it.

Eliminate all restrictions to wolf dispersal and movements.

Under the current rules, Mexican wolves must stay within the boundaries of the Blue Range Wolf Recovery Area (BRWRA), which comprises the Gila National Forest in New Mexico and the bordering Apache National Forests in Arizona. But wolves have large area requirements and can't read maps. They need access to good habitat throughout their historic range and often cross the invisible political lines in search of new homes and prey. Under the existing rule, wolves that leave the BRWRA boundary are captured and relocated back into the Blue Range, which disrupts packs, thwarts expansion and dispersal of the population, and sometimes causes serious injuries to individual wolves. In the revised rule, there should be no exclusion of geographic areas from potential occupation by wolves.

Expand the area for initial releases to anywhere within the Blue Range Wolf Recovery Area.

Under the current rules, releases of wolves from the captive population are only allowed in Arizona, a provision that severely limits the agencies' options for meeting the BRWRA objective of a viable, self-sustaining population of at least 100 Mexican wolves. For example, the portion of the population residing in New Mexico could benefit from genetic augmentation by releasing wolves currently in captivity. A rule change that allows new releases throughout the BRWRA would give agency managers much needed management tools for assuring the viability and self-sustainability of the BRWRA population of Mexican gray wolves.

Resolve livestock-wolf conflicts in ways that keep wolves in the wild and achieve progress towards reintroduction objectives.

Under the current rules, ranchers using public lands are not required to remove or render inedible the carcasses of livestock that die for various reasons like disease and starvation. Wolves are attracted to and often scavenge on these carcasses, and may begin to prey on live cattle or horses nearby. Wolves that kill three head of livestock in a year are either killed or placed in captivity for the rest of their lives. A revised rule must require owners of livestock using the public land to clean up dead stock before wolves find and scavenge on them.

Stop killing and removing wolves: reduce “take.”

The current rule allows excessive wolf removal (defined as “take” in the ESA) that is precluding achievement of the reintroduction objective of 100+ wolves in the BRWRA population. A revised rule must allow less “take” of wolves.

Revise the Recovery Plan.

The Recovery Plan is out of date; it has not been amended for 25 years and does not include objectives for full recovery of Mexican gray wolves. The Fish and Wildlife Service is attempting to change the rule before recovery has even been defined for Mexican gray wolves. 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.

Place no cap on the number of wolves in the wild population.

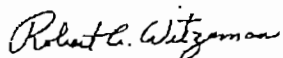
A viable, self-sustaining population of at least 100 wolves is a *minimum* objective for the BRWRA population of wolves. Recovery has yet to be defined through revision of the recovery plan. No maximum should be set for the number of wolves in the wild through this rule change.

Include nothing in the amended rule that would preclude future recovery options.

This rule change should not include any provisions that would limit in any way future options for recovery of Mexican gray wolves anywhere outside the current boundaries of the BRWRA.

Please keep us posted on all actions, documents, hearings and opportunities for public input in this matter. Thank you for this opportunity to respond.

Sincerely,



Robert A. Witzeman, M.D., Conservation Chair, Maricopa Audubon Society

witzeman@cox.net

602 840-0052, fax 602 840-3001

811 West Happy Valley Rd.
Phoenix, AZ 85085-2845
December 17, 2007

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

Re: Mexican Gray Wolf Reintroduction
Project in Arizona and New Mexico

I attended your Public Scoping Open House here in Glendale, AZ on Dec. 8, 2007. I viewed the film, spoke with your representative, John Slown, studied the printed materials, and these are my conclusions:

1. **WOLVES REQUIRE A VERY LARGE AREA TO HUNT AND MAINTAIN THEIR FAMILY PACK TERRITORIES AND MUST BE ALLOWED TO EXPAND FREELY INTO THEIR HISTORIC HABITAT.**
They cannot read our boundary signs and wander out of their small designated area. To trap and return them to the original area is to destroy their family pack affiliation and can cause fatal confrontations for territory. Sustainability requires that we understand and respect the very social structure of wolf communities.
2. **THE CLASSIFICATION OF THIS PROJECT MUST BE CHANGED FROM "EXPERIMENTAL, NON-ESSENTIAL" TO "EXPERIMENT, ESSENTIAL" OR "ENDANGERED" TO GIVE THEM THE PROTECTION THEY REQUIRE TO SUSTAIN THEMSELVES.**
The existing classification is failing miserably to protect them.
3. **THE AREA FOR INITIAL RELEASES MUST BE EXPANDED TO THE ENTIRE BRWRA.**
Sustainability requires genetic diversity. New Mexico captive wolves must be released into the area along with the wolves that can now be released only in Arizona.
4. **THERE MUST BE A REVISED RULE REQUIRING LIVESTOCK OWNERS USING PUBLIC LANDS TO QUICKLY REMOVE CARCASSES OF LIVESTOCK THAT HAVE DIED FROM NATURAL CAUSES.**
It is ludicrous and unfair to allow these carcasses to remain to attract wolves and then blame and kill the wolves for dining on them.
This must be enforced and stopped.
5. **STOP THE REMOVING AND KILLING OF WOLVES AS "TAKE".**
It is impossible to achieve a sustainable level of wolves if the rules allow them to be killed when their numbers are nowhere near the minimum goal of 100 that was set and are steadily dropping. The goal of 100 wolves was a BARE MINIMUM objective. No maximum has yet been determined and the number needs to be left open to give the recovery program a chance to succeed.

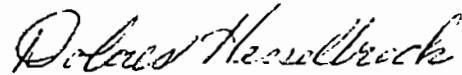
Page 2.
PERSONAL COMMENT

WOLVES HAVE ALWAYS BEEN A NATURAL, ESSENTIAL ELEMENT OF THE SOUTHWEST.
THEY ARE NEEDED FOR BALANCE.
THEY ARE AN IMPORTANT PART OF THAT WILD WE YEARN TO EXPERIENCE WHEN
WE HIKE AND CAMP IN THESE LAST BEAUTIFUL, NATURAL PLACES.

WOLVES HAVE EVERY RIGHT TO LIVE FREE IN THEIR HISTORIC HABITAT.

AND WE AND OUR CHILDREN HAVE EVERY RIGHT TO ALWAYS BE ABLE TO HEAR THAT
MYSTERIOUS, HAUNTING HOWL ECHO THROUGH THE NIGHT AS WE GAZE UP AT THE
STARRY DESERT SKIES.

PLEASE RE-WRITE THE RULES TO HELP THE WOLVES SURVIVE AND CARE FOR THEIR
FAMILIES AS WE CARE FOR OURS. --



Dolores Hesselbrock
Phone: 623-582-0400

Copy: John Slown



Elizabeth Pakvis
3807 E Pasadena Ave
Phoenix, AZ 85018-1514

Dec. 17, 2007

Tel: 602 957-1289

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

Attention: Wolf Program

Following is my input regarding the Wolf program.

The ignorant way a federally funded program once decimated these animals resulted in hunters' claim they are doing a necessary job in keeping down the deer population. Really? That was the wolf's job.

So the wolf was killed off to the advantage of the rancher with the additional benefit to hunters who kill for pleasure; not as in days past out of necessity.

So, yes, I am in support of giving the wolf a chance. Besides, Canis Lupus, the wolf, was here first, right?

I am from a country where the only wildlife is the hare and a few skunks. The United States does not realize what it is losing.

Yours,

Elizabeth Pakvis





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DEC 26 2007
USFWS-NMESFO

December 18, 2007

Mr. Brian Millsap
State Administrator
U.S. Fish and Wildlife Service
New Mexico Ecological Services Field Office
2105 Osuna NE
Albuquerque, NM 87113
R2FWE_AL@fws.gov

Re: Comments pursuant to Federal Register Vol. 72, No. 151, Pages 44065-44069: *Endangered and Threatened Wildlife and Plants; Notice of Scoping Meetings and Intent to prepare and 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 Dr. Millsap:

The Arizona Zoological Society and the Phoenix Zoo are concerned with the Mexican gray wolf reintroduction program, and would like to submit the following observations and comments:

Mexican gray wolves are listed as "endangered" under the Endangered Species Act (ESA). Establishment of a "non-essential, experimental" population of Mexican gray wolves in the Blue Range Wolf Recovery Area (BRWRA) was initiated in 1998 and continues to this day. The objective of the BRWRA reintroduction project is to establish a population of *at least* 100 Mexican gray wolves, including 18 breeding pairs – intended to be achieved by the end of 2006. However, by the end of last year there were only 59 wolves with 6 breeding pairs in the wild population. This can hardly be considered a successful reintroduction process.

In 2007 twenty one Mexican wolves have gone missing, been killed, or been removed from the wild population. Eleven pups have been observed among five packs. When next the official count is made in January 2008, a population decline in both wolf numbers and breeding pairs appears extremely likely.

While we agree with the Service and numerous NGO's that some provisions of the existing rule severely impair the possibility of recovery, we also believe the reintroduction program's problems are deeper than the rule itself. The overriding issue is that many, if not most, of the management actions taken relevant to the reintroduction program fail to meet the legal requirement of the Endangered Species Act ESA §10(j)(2)(A) that the reintroduction further the conservation of the species, and also do not live up to the Service's promise in the Final EIS (page 2-16) that its actions, while achieving the least impact on private activity, would be consistent with wolf recovery.

We believe that there are at least six reasons that the reintroduction program is stalled and appears to be failing: the requirement that wolves stay within the boundaries of the Blue Range Wolf Recovery Area (BRWRA); the prohibition on "naïve" releases in New Mexico; poaching; the US Forest Service's disregard of its obligations in regard to endangered species; failure to consider genetic issues, and excessive removal of wolves from the wild. Our greatest concerns, as a zoo and a zoological society, have to do with the last three of these issues.

It is of utmost importance that the Service consider Mexican wolf genetics. Because the genetics of the individual wolves contribute to their reproductive fitness and the population's ability to adapt, they have a profound effect on the subspecies' ability to recover. The first and more obvious point is to consider the genetic importance or value of individual wolves when making management decisions. Wolves with moderate to high genetic value have been lethally controlled with complete disregard of the resulting effects on recovery of the subspecies. A recent paper by Fredrickson et al. (Genetic rescue and inbreeding depression in Mexican wolves. *Proc Roy Soc B* 274:2365-2371, 2007) discusses the state of the captive and wild populations and the crucial role of mixed-lineage animals in the "genetic rescue" of the wild population. This paper also touches on the necessity of growing the wild population, which has not just demographic significance, but genetic significance as well. The red wolf re-introduction program came close to failing completely due to a parallel situation with hybridization and excessive genetic loss. Along those same lines, recent zoo-based publications have helped re-enforce the presence of inbreeding depression in the taxon. A paper by Asa et al (Relationship of inbreeding with sperm quality and reproductive success in Mexican gray wolves. *Anim Conserv* 10:326-331, 2007) has supported earlier findings and reports of inbreeding depression in the work of Frederickson.

Another issue merits the Service's attention. A recent paper by Frankham (Genetic adaptation to captivity in species conservation programs. *Molecular Ecology: Online Early Articles*, 2-Aug-07 doi: 10.1111/j.1365-294X.2007.03399.x) clearly states that species cannot be maintained in captivity for long before they become unfit for life in the wild. A paper by Leonard et al (Legacy lost: genetic variability and population size of extirpated US grey wolves (*Canis lupus*). *Molec Ecol* 14:9-17, 2005) found that historical samples from pre-extirmination wolves had more than twice the genetic diversity of their modern captive bred descendants. The Mexican wolf belonged to a unique southern clade, according to this study. The adaptive fitness of the Mexican wolf will be further jeopardized by continuing to limit its remaining genetic diversity and delaying its survival in the wild. This work underscores the importance of the current wild population to recovery, and provides a warning that the captive Mexican wolf population may not be able to provide suitable replacement animals for those removed, or candidates for new reintroductions, in the future.

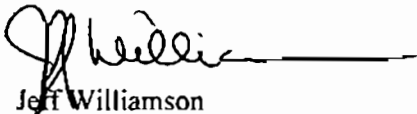
Zoos have been crucial to the work involved in re-establishing Mexican wolves in the BRWRA, but we feel that, as it stands, the reintroduction program is counting on zoo's continuing to supply animals for release and, apparently, subsequent removal. This situation is not only extremely frustrating, expensive, difficult, and laborious; it is also untenable, since the animals will only become less likely to have the genetic and adaptive fitness to successfully survive in the wild. By definition, a non-essential experimental population is not essential to the continued existence of the species. We feel, given the results of recent research on the genetics that affect this process, that each and every Mexican wolf is sufficiently important to the health and eventual survival of the whole to deem complete protection. We therefore respectfully propose the following:

- 1) Reclassify the reintroduced population of Mexican wolves as Endangered as stipulated by the Endangered Species Act, affording the remaining wolves the full protection they deserve. We understand such a designation may compromise the management flexibility to deal with livestock depredation and other negative impacts.
- 2) Eliminate legal take unless such circumstances as described by the ESA and applied to other endangered and fully protected carnivores. You must consider population size and structure, number of breeding pairs, genetic importance of individuals and genetic health of the wild population, as well as progress toward the reintroduction goal and recovery. The only take allowed, once established, would be in defense of human life.
- 3) Allow more options for non-injurious harassment of wolves as a way to adversely condition them to avoid livestock and human habitations. Specifically, the rule should be amended so that the Service's proposed paint-ball program can be initiated and tested.

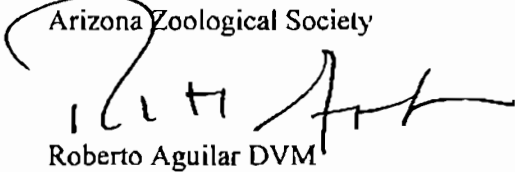
- 4) Make no restrictions on where wolves can disperse or establish territories.
- 5) Make no restrictions on where wolves can be released, including the release of "naïve" wolves directly from captivity.
- 6) Make no provisions that allow circumstances for legal take. For example, the proposed allowance for the public to kill wolves attacking pets should never have been seriously considered. Pet owners can take fairly simple precautions to keep their pets safe. Leash laws exist in urban areas for the protection of the pet. They can also be applied to pets in wolf release areas. The program could be severely impacted by opponents shooting wolves after "baiting" them with animals. The Service is aware of rumors if not incidents of baiting with livestock. Doing so with dogs would be easy, and opening this possibility would greatly frustrate law enforcement efforts to distinguish between legal and illegal take.
- 7) Make no provisions that would limit future recovery options – for example no constraints on population size, geographic distribution of wolves, or the number, location or size of future reintroduction areas.

Under the existing rule, the Fish and Wildlife Service is not fulfilling its mandate under the ESA to recover Mexican gray wolves. As a zoo and a Zoological Society, it is our goal to see Mexican wolves not only survive, but fully recover as a vibrant, active, genetically sound population that also acts as an indicator of the environmental health and balance of the area. The Blue Range population of Mexican gray wolves is essential to long-term recovery of this endangered subspecies: captive populations will not safeguard Mexican wolves from extinction in the long-term. An Endangered designation will give these wolves the stronger protections they need to succeed in the wild.

Sincerely,



Jeff Williamson
President
Arizona Zoological Society



Roberto Aguilar DVM
Director of Conservation and Science
Phoenix Zoo

Bob Sahren
3937 W Paradise Dr
Phoenix Az 85029

Dec 19. 2007

RECEIVED

DEC 26 2007

USFWS-NMESFO

I dislike Wolves very much
They kill mostly ~~mostly~~ for fun
They kill baby elk's, calves, deer and
calves.

I have been to New Mexico, on
a ranch, where they ride horses
all day to protect the new
barn.

I have heard rumors
about the wolves Crusaders
picking up carcasses
before the Rancher has a chance
to find them. The Crusaders
drive their vehicle illegally across
Country. I have been 5 western states
nobody that lives outside of town
wants the wolves in there area.

Sincerely

Bob Sahren

December 19, 2007

U.S. 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 would like to comment on the Wolf Program. Mexican gray wolves were a part of our environment long before there was a United States of America. Through greed and thoughtlessness, they were exterminated nearly to extinction. We are now more enlightened about the world around us enough to know that man cannot rule nature and when we try to do so, it only makes things worse. The Mexican gray wolf deserves it's place in this world and we must learn to live with them.

Ranchers should not be so selfish as to think their grazing rights entitle them to abuse all natural elements that might interfere with their business. If I owned a pizza parlor on a given corner, I would not be allowed to gun down the competition! Any given business, cattle ranching otherwise, has it's problems. There are solutions other than killing a Mexican gray wolf and *ranchers should be required* to remove dead cows and whatever else is necessary to avoid problems.

Mexican gray wolves are a part of our country's heritage and should be allowed to roam their natural territory. Please give them full protection as an endangered species.

Sincerely,


Hilda Boylan

Hilda & Terry Boylan
4125 E Campo Bello Dr
Phoenix, AZ 85032

U.S. 1.
New #

FOUND IN SUPPOSEDLY
EMPTY EQUIPMENT

2105

Albuque

Attain: Wolf Program ~~27113441~~

G. WAYNE McKELLIPS, JR.
ATTORNEY AT LAW

3300 NORTH CENTRAL AVENUE, SUITE 1900
PHOENIX, ARIZONA 85012
(602) 264-2261

MAIL ADDRESS
POST OFFICE BOX 33907
PHOENIX, ARIZONA 85067
FAX (602) 277-4507

December 20, 2007

U. S. Fish and Wildlife Service
Attn: Wolf Program
New Mexico Ecological Service Field Office
2105 Osuna NE
Albuquerque, NM 87113

RECEIVED
DEC 26 2007
USFWS-NMESFO

Dear Sir or Madam:

This letter is in response to your solicitation of public comment on the wolf program.

I was born and raised in Arizona and have spent many days in the wilds of Arizona hiking, hunting, fishing and camping.

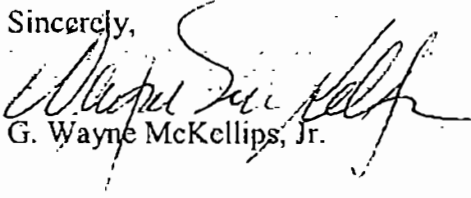
Frankly, I am appalled at the idea that the environmental activists have been seeking and continue to seek to reintroduce wolves. I am very opposed to the idea. There is no point whatever, as far as I am concerned, other than that some special interest group is pursuing their fairy tale idea to put everything back in nature the way it was before white man came to this continent.

In my opinion this is one more step intended to destroy the cattle industry, just as the environmental extremists have successfully destroyed the lumber industry in Arizona and are seeking to shut down mining and cattle ranching also.

The elk and deer populations can successfully be maintained through regulated hunting. There is no need to reintroduce wolves so there will be additional predators. I believe wolves are a danger to humans and their pets and livestock and should not be reintroduced, particularly at the expense of the cattle industry.

I am now 66 years old and if it were not for back roads maintained by the ranchers I would not have access to the wilderness. I do not want it shut down so that only a few hardy souls can hike in to enjoy it. I also do not want to have to worry about potential danger from wolf packs to my grandchildren and pets.

Sincerely,


G. Wayne McKellips, Jr.

How to Submit Comments

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- Fill out the comment portion of this brochure and leave it in the drop box
- Take the brochure with you and return it by mail
- Provide comments via e-mail. For your convenience, you can do that here at the computer station, or visit www.mexicanwolf.org
- Faxed comments may be sent to (505) 346-2542

Please note: In order to be considered part of the formal record, your comments must include your name and address. Comments may be submitted through December 31, 2007.

Before including your address, phone number, e-mail address, or other personal information in your comment, you should be aware that your entire comment--including your personal information--may be made publicly available at any time. While you can ask us in your comment to withhold your personal information from public review, we cannot guarantee that we will be able to do so.

Comments:

- 1) Resist as endangered
- 2) Current boundary too small. Why have any boundaries? Work towards this expansion.
- 3) No shooting by pet owners if pet attacked but allow non-injury methods. Yelling, horn, water etc
- 4) Stop removing wolves unless injured/ill. Stop breaking up family pack. More wolves needed.
- 5) Be flexible. No limitation wording in new rules. They will bring a balance to nature - be patient!

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DEC 9 9 2007

USFWS-NMESFO

Name: Mildred A. Petras

Street: 301 S. Broadway

City, State, Zip: Phoenix, AZ

85022

Tape closed with address on outside, and add a stamp.

DO NOT STAPLE
Thank you for your input!

2102 W. Dahlia Dr.
Phoenix, AZ 85029
December 20, 2007

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DEC 26 2007
USFWS-NMESFO

U.S. Fish and Wildlife Service
Attn: Wolf Program
New Mexico Ecological Service Field Office
2105 Osuna NE
Albuquerque, NM 87113

Dear Administrator:

Please restore Mexican gray wolves to their historic range in the Southwest.

Since the restoration program began in 1998, only 59 wolves remain in the wild wherein the original objective was to establish a population of 100 in the wild by the end of 2006.

The value of the wolves to the overall health of the ecosystem cannot be underestimated. Unfortunately ranchers, even though they should be applauded for many conservation efforts on public lands, have fail to voluntarily participate in Mexican wolf recovery. Ranchers can choose to be a part of this effort or they can get out of the way.

To alleviate depredation on cattle, ranchers should be required to 1) remove dead cattle from the wolf recovery areas or 2) treat livestock carcasses with lime to make them inedible.

Wolves should be allowed to move outside the boundaries of recovery areas if 1) the land is suitable and 2) the animals have caused no problems. I support more Mexican wolf reintroductions within Arizona if more of their historic range is currently suitable.

Wolves are an integral part in the health of an ecosystem, but they don't understand rules and they can't restrict their movements within certain boundaries. It should be mandatory for ranchers to cooperate in complete Mexican wolf recovery, resulting in 100 wolves living in the wild by the end of 2012. It's the right thing to do and will benefit not only the general public, but ranchers, wolves and other wildlife species as well.

Thank you for considering my comments regarding the Mexican wolf reintroduction program.

Sincerely,


Marcia Ketterer

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

December 26, 2007

Re: Mexican Gray Wolf
Scoping Process

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DEC 28 2007
USFWS-NMSEFO
USFWS-NMSEFO

Dear Mr. Millsap:

For more than 25 years, I have supported the restoration of the Mexican Gray Wolf to its native habitat through organizations such as Preserve Arizona's Wolves (PAWs), Defenders of Wildlife, The Sierra Club, and Center for Biological Diversity. I continue to hope that the recovery of the wolf to all of North America will some day occur.

Over the centuries, this magnificent animal unfortunately became the most maligned mammal of all wildlife. Only the Native Americans realized its place in the environmental and ecological habitats.

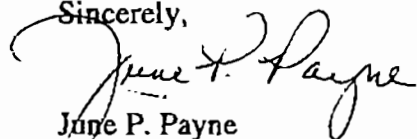
The recent scoping process meetings have, I hope, set the stage to correct mistakes of the past. While the USFWS must work with the ranching industry, it should not pander to it. Setting the priorities for all wildlife — especially the endangered species — is necessary.

I will not list all of the issues that are presently being considered, but I do endorse the fact that wolves need stronger protection and more room to roam in both Arizona and New Mexico. I especially object to the provision that allows livestock interests (or others who object to wolf recovery) to kill wolves just because they are on grazing property — which actually belongs to *all* Americans, not just the ranchers who lease the land.

Enclosed is a photo copy of the *Arizona Republic's* editorial, "Let wolves prosper," which appeared December 17, and which eloquently states the reasons to protect wolf restoration. *High Country News* (Paonia, CO) also has an eight-page article in its December 24 issue that is most relevant.

✓ Thank you for reading my letter and considering my views. I am sending a copy of this letter to John Slown.

Sincerely,



June P. Payne
4733 East Cambridge Avenue
Phoenix, AZ 85008-1507
Phone: (602) 840-3427
Fax: (602) 952-8526

December 29, 2007

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

USFWS-NMESFO

DEC 31 2007

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ATTN: MEXICAN GRAY WOLF NEPA SCOPING

By mail or at the public scoping, two different names show or two info forms; thus both are addressed above.

Congratulations for holding NEPA scoping in the Phoenix metro at the Glendale Civic Center. Being a follower of the Mexican Gray Wolf Recovery since 1999, had organized a carpool of 4 to attend a program meeting in Morenci, Az. (think was '04) and traffic in Maricopa County was dense and slow for the pick-ups; thus our arrival was approaching 11AM, and the meeting room was empty as if no one but agencies' staffs had shown, and departed. Have been able to read the Arizona Game and Fish emails regarding program updates for 5-6 years. Appreciate much all staffs' efforts for the program whether they be with the USFS, the NM (game, fish) agency and the Arizona Game and Fish.

Historically Mexican Gray Wolves' were wildlife of Texas and the country of Mexico as well as the States of Arizona and New Mexico. Thus Texas areas should be included in the U.S. program: the Guadalupe Mtns, the Sierra Diablo Mtns, the Cornudas Mtns and the Hueco Mtns (both Tx. & NM). In NM consideration of gray wolf habitat should include the Hueco Mtns, the Lincoln Nat'l Forest, the Fort Bliss Military Reservation, the Organ Mtns and the Jarilla Mtns; what about the Cibolla Mtns. and other ranges farther north in NM? In Az. the recovery should be inclusive more westerly and southerly: the Sierra Ancha Mtns. the Blue Ridge area on the Mongollon Plateau, the Coronado Nat'l Forest and adjacent mountains: Pedregosas (Az.) and Animases (NM).

The program's progress would be enhanced by expanding the recovery areas in the 3 States. All areas should be classified as "primary recovery zones"!!! Wolves do not know about mankind boundaries called "areas" or "zones" or Once packs establish territories, use said "packs' territories" as the primary recovery zones. The wolves should roam freely - yes, their territories' geographies will change like formations of amoebas do, but that is what is best for them and this recovery program. Release areas should be equal to packs' territories. You will never have 100-150 wolves unless you seize initiatives to use areas of the 3 States and allow the wolves to live free.

Two impediments to a successful program are cattle ranchers and the removal of wolves from their territories. Ranchers on public lands do not remove their dead cattle purposely to bait the reintroduced wolves; the ranchers thus are murdering recovery wolves. Ranchers must understand that they would be restricted from using public lands (even though a fee per head is paid) if they do not totally resolve the conflict of wolves and dead cattle.

No wolf should be removed from his/her territory because of killing any live cattle (and wolves learn about cattle from the dead cattle not removed from the wolves' territories. If a wolf kills 6 live cattle, the wolf should remain in the wolf territory since the rancher is paid for dead cattle.

The Mexican Gray Wolf has been an endangered specie since the mid 1970s. This recovery program took time to get under way from an original recovery plan.

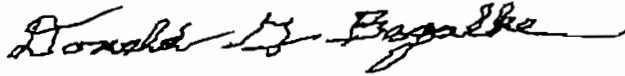
Update the Recovery Plan for the Mexican Gray Wolf (over, please)

with the removal of all wolf restrictions in expanded territories in the 3 States of Arizona, New Mexico and Texas - our U.S. HISTORICAL GEOGRAPHY FOR THE MEXICAN GRAY WOLVES.

The U.S. Public is dominantly supporting this wolf recovery program. Time has not been set for 100-150 Mexican Gray Wolves. However, in this NEPA process set a year for achieving reaching the 100-150 Mexican Gray Wolves in the U.S.A.

Thank you for allowing Citizens in this NEPA Scoping.

Best regards,

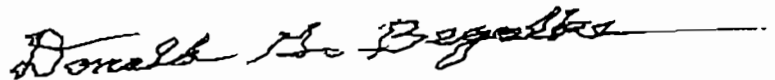


Donald G. Begalke
PO Box 17862
Phoenix, Az. 85011-0862
Telephone: (602)279-3402*
Email Address: lakeharquahala@yahoo.com**

*no recording machine; if the phone rings 5 times without answer, am away at the time

**email access is via a public library program that has limits; emails are appreciated, but not read nor responded to daily.

POSTSCRIPT INQUIRY: Will we of the Public receive a booklet of all the comments made by the Public Individuals and by the companies and the organizations?



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Comments: Please, see my letter on green paper, enclosed.
Thank You!!

Name: Donald G. Begalke

Street: PO Box 17862

Phoenix, Az. 85011-0862

City, State, Zip : _____

Tape closed with address on outside, and add a stamp.

DO NOT STAPLE
Thank you for your input!

How to Submit Comments

Written comments accompanied by name and address will become part of the formal record of the scoping process. While you may provide your ideas verbally during the meeting, we want to make sure your input is formally captured in your own words. You may submit written comments in three ways:

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USFWS-NMESFO

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Comments:

I am so glad that I attended your meeting on the progress of the Mexican Gray Wolf program, it was very informational. I think that it is important for the program to be continued and expanded giving these animals the advantage of a larger habitat in which to grow and prosper. Ranchers should not be allowed to shoot them, even on their own land and they should be required to take away any dead cattle immediately as this does give the wolf a taste for the domestic beef.

The wild animals in our world are under duress with humans overpopulating and taking their habitat (homes) away from them. We need to do everything we can to help these animals so their species can continue. Our world would not be complete without these animals. I think of the Siberian Tiger where there are more in captivity than in the wild and that is very sad.

Name: Elaine Mayo

Street: 1246 E Wagon Wheel

City, State, Zip: Phoenix, AZ

85020

Tape closed with address on outside, and add a stamp.

DO NOT STAPLE
Thank you for your input!

From the desk of  Robbie Lange

The enclosed article
says it all.

Let Wolnes Prosper.

RECEIVED

DEC 31 2007

USFWS-NMESFO

 Robbie Lange
12209 S. Chinoak Ct
Phoenix, AZ 85044



**SIERRA
CLUB**
FOUNDED 1892

Grand Canyon Chapter • 202 E. McDowell Rd, Ste 277 • Phoenix, AZ 85004
Phone: (602) 253-8633 Fax: (602) 258-6533 Email: grand.canyon.chapter@sierraclub.org

December 31, 2007

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

Re: Scoping Comments pursuant to Federal Register Vol. 72, No. 151, Pages 44065-44069:
Endangered and Threatened Wildlife and Plants; Notice of Scoping Meetings and Intent to prepare and 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 Mr. Slown:

Please accept these scoping comments on behalf of the Sierra Club's Grand Canyon (Arizona) Chapter and our more than 14,000 members here in Arizona. We appreciate the opportunity to provide scoping comments on the proposal to revise the Endangered Species Act section 10(j) rule that established and governs the management of the nonessential experimental population of Mexican gray wolves in the Blue Range Wolf Recovery Area.

The Sierra Club is America's oldest, largest and most influential grassroots environmental organization. Inspired by nature, the Sierra Club's 1.3 million members and supporters, including the 14,000 members of Arizona's Grand Canyon Chapter, work together to protect our communities and the planet. The Sierra Club has long supported the reintroduction of the Mexican gray wolf to the landscape and their ultimate recovery across their historic range. Wolves have been a critical missing piece in the ecological puzzle of eastern Arizona and western New Mexico. Now that the wolves are on the ground, it is essential that we and you do everything possible to ensure their long-term viability and success. It is both a moral and legal responsibility. In addition to our comments provided here, we are supportive and incorporate by reference the comments submitted by the Rewilding Institute.

Introduction

While it is clear, based on both the three and five year reviews of the program, that the wolves are doing their part in the wilds of eastern Arizona and western New Mexico – they are killing prey, breeding, forming packs, and raising their young – there are problems with the current management

that are hindering the reestablishment of a sustainable population of wolves and their ultimate recovery and conservation. In that vein, we ask that you develop a conservation alternative that eliminates all restrictions to wolf dispersal and movements, includes authority to conduct initial releases of captive wolves anywhere within the Blue Range Wolf Recovery Area, requires livestock operators on public land to remove, bury, or render inedible carcasses of dead livestock to reduce the likelihood that wolves become habituated to feeding on livestock. Given that the Blue Range Wolf Recovery Area population of Mexican gray wolves has failed to attain the reintroduction objective, it is imperative that measures to reduce potential conflicts between wolf recovery and livestock operations (the greatest cause of wolf removals) be considered in a revised rule.

Mexican gray wolf

The Mexican gray wolf (*Canis lupus baileyi*) has long been recognized as a subspecies of the gray wolf (*Canis lupus*) and was first listed as an endangered subspecies under provisions of the Endangered Species Act (16 U.S.C. §§ 1531 *et seq.*) in 1976. Please address the oversight in the title of the document in the Federal Register (72 Fed. Reg. 44065), *Endangered and Threatened Wildlife and Plants; Notice of Scoping Meetings and Intent to prepare and 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*. The current population of wolves in Arizona and New Mexico is a population of the Mexican gray wolf subspecies of the gray wolf. Therefore this and any future documents should use the proper designation for the animals. The title of this document should be changed to the "Proposed Amendment of the Rule Establishing a Nonessential Experimental Population of the Mexican Gray Wolf in Arizona and New Mexico."

Develop and Evaluate a "Conservation Alternative"

Per the requirements of the National Environmental Policy Act, the US Fish and Wildlife Service (USFWS) should include and fully evaluate a "Conservation Alternative" to the existing rule – an alternative that focuses on conserving the wolves per the Endangered Species Act and that ensures a self-sustaining population of wolves in the Blue Range Wolf Recovery Area. This alternative should include, at a minimum, the following:

- Reclassification of this population of Mexican gray wolves as endangered with the full protection afforded by the Endangered Species Act. The current experimental nonessential classification is both inappropriate, as these wolves are clearly essential, and is detrimental to the conservation of the subspecies.
- Removal of the artificial restrictions on wolf movements thus allowing dispersal and establishment of territories by Mexican gray wolves outside the boundaries of the Blue Range Wolf Recovery Area. Mexican gray wolves should be afforded the same flexibility given other endangered species and should not be harassed, captured or killed for straying from the recovery area.
- Establishment of a primary goal to achieve the recovery objective of establishing a viable and self-sustaining population of at least 100 Mexican gray wolves within the Blue Range Wolf Recovery Area, with no upper limit on the future number of wolves in the area and beyond.
- A provision for maximizing and maintaining the genetic integrity of the BRWRA population. Current management does not account for the need to maximize the genetic diversity and

integrity of the wild wolf population. Genetically essential animals are frequently removed or killed.

- A provision requiring the removal or rendering inedible of livestock carcasses, to limit the livestock-wolf conflicts. Given recent media reports (See High Country News, December 24, 2007) regarding ranchers baiting of wolves, this is even more critical. The livestock industry must take responsibility for its property – the cattle and sheep that wander about on the public's lands.
- A provision calling on the Forest Service to execute its ESA § 7(a)(1) duties for the Mexican gray wolf by adopting and implementing conservation programs or policies that serve to better avoid wolf-livestock conflicts. To date, the Forest Service has used the experimental nonessential status of the wolves to avoid doing anything to fulfill its responsibility to this endangered animal.
- No limits on the expansion of the existing geographic scope of the current population area. The wolves should be allowed to determine the appropriate habitat. Direct introductions into New Mexico should also be allowed.
- A requirement for the USFWS to expeditiously complete recovery planning for the Mexican gray wolf. The current recovery plan is badly outdated and is need of revisions.
- A provision granting discretionary authority to the USFWS to reduce (but not increase) authorized take prescribed in a revised rule to accomplish future recovery objectives.

This Conservation Alternative would help ensure the USFWS compliance with the Endangered Species Act and better accomplish the successful completion of the BRWRA Mexican gray wolf reintroduction project. Under the Conservation Alternative, the USFWS could focus on recovering the Mexican gray wolf rather than the current practice of wolf control.

“Endangered” Mexican Gray Wolf

The current population of wolves is classified as “experimental nonessential” under Section 10(j) of the Endangered Species Act. This is both contrary to common sense – the wolves are clearly essential – and to the law, the Endangered Species Act. The “experimental nonessential” status is only allowed if it contributes to the conservation of the subspecies, which it does not. Reclassification of this population of Mexican gray wolves as “endangered” with the full protection afforded by the Endangered Species Act is both necessary and appropriate in order to fulfill the mandate of the Endangered Species Act and to ensure conservation of these animals.

“Take” of Mexican Gray Wolves

The Endangered Species Act and the documents authorizing the establishment of an “experimental non-essential” population of Mexican gray wolves within the Blue Range Wolf Recovery Area (BRWRA) require that authorized take of Mexican gray wolves from the BRWRA population not preclude progress toward recovery of the subspecies. The Endangered Species Act § 10(j)(2)(A) authorizes the Secretary of the Interior to release experimental populations of endangered and threatened species only “if the Secretary determines that such release will further the conservation of such species.” The Endangered Species Act further defines “conservation” as “the use of all methods and procedures which are necessary to bring any endangered species ... to a point at which the measures provided pursuant to this Act are no longer necessary.” It is quite clear, however, that the USFWS changes to the “take” prohibitions found in Section 9 of the ESA, 16 U.S.C. §

1538(a)(1) are precluding the Mexican gray wolf's progress toward recovery and hindering conservation of the sub-species.

We request that take provisions currently authorized by Section 17.84(k)(9)(iii), (k)(10), and (k)(11) be eliminated from any revised rule. Furthermore, we request that any revised rule not directly authorize take in excess of that allowed by the other sections.

According to information available to the public, only one Mexican gray wolf has been lethally taken by a private person in a lawful manner and that was the case involving the killing of a wolf in alleged self defense. Another ten wolves have been hit by vehicles, but not reported. Had they been reported, they would have been lawful per the rule. Only 11 wolves have been taken under these provisions. On the other hand a large number of Mexican gray wolves have died or been seriously injured as a result of authorized agency capture or lethal take efforts. Permanent removal of Mexican wolves by agency managers has the same effect on the wild population as mortalities from all causes (legal or illegal), including lethal control of wolves by the managing agencies.

In 2006, nearly 90% of all management removals and lethal control were in response to livestock depredation and were carried out under the terms of SOP 13. It is important to note that SOP 13 is a discretionary management measure, which is allowed *but not mandated* by the existing rule. Any rule revisions should include the repeal of SOP 13.

Mexican Gray Wolf Reintroduction Numbers and Genetic Diversity

The primary objective of the BRWRA reintroduction project is to establish a viable, self-sustaining population of at least 100 Mexican gray wolves in the wild. This objective is set forth in the final Environmental Impact Statement (EIS) and is consistent with the Mexican Gray Wolf 1982 Recovery Plan, Record of Decision, and Final Rule. At page 2-5, the EIS further establishes the chronological objective of achieving the 100-wolf population level by "about the year 2005." Because the reintroduction project commenced one year later than planned, this goal becomes effectively "about the year 2006."

In its 2006 Annual Report (the most recent program assessment), the USFWS estimated the wild population of wolves at 59 with seven breeding pairs. According to project data, the population has grown by only an estimated four wolves in the past three years and is currently 41% short of the minimum objective of "at least 100 wolves." The actual number of breeding pairs lags the expected number by 11 breeding pairs.

In 2007, there have been at least 23 Mexican wolves that have gone missing, been killed, or been removed from the wild population. Fifteen of these removals were ordered by USFWS. Only thirteen pups have been observed among five packs. Based on this information, it is pretty clear that when next the official count is made in January 2008, a population decline in both wolf numbers and breeding pairs appears likely.

The USFWS has failed to meet the numerical objective of at least 100 wolves by about the end of 2006, and there is no evidence to suggest that the current population is on a growth trajectory to reach that goal in the foreseeable future. In fact, it appears the opposite is true.

In addition to concerns about the low number of wolves in the wild, the current program does not adequately address the importance of promoting and maintaining genetic diversity in the wild population. All Mexican wolves derive from one or more of three certified pure lineages of Mexican gray wolves—McBride, Ghost Ranch, and Aragon. In a recent analysis by Fredrickson et al. (2007), the authors concluded that wolves with ancestry from two or more lineages exhibited superior fitness compared to single-lineage Mexican gray wolves.

We are aware of no example of a management decision to allow a genetically important Mexican wolf to remain in the wild when current procedures otherwise call for its lethal control or permanent removal. Even if genetically important pups are left in the wild, the removal of one or more of their parents, adult pack members, or yearling pack members will diminish their probability of survival.

To ensure the USFWS compliance with federal law, any revision to the rule must contain absolute requirements for demonstrated progress toward meeting the reintroduction objective of sustainable population of wolves in the wild. Any revision to the rule must also contain absolute requirements for achieving a high standard of genetic viability in the reintroduced population. This standard should be established by recognized experts on Mexican wolf genetics in consultation with the Mexican Wolf Species Survival Plan committee of the Association of Zoos and Aquariums.

A Current Recovery Plan

The Mexican Gray Wolf Recovery Plan is badly outdated and was adopted back in 1982 – twenty five years ago. The USFWS policy requires that recovery plans be reviewed every five years and updated or revised if they are out of date or not in compliance with the Endangered Species Act. The Mexican Wolf Recovery Plan (USFWS 1982) has never been updated or revised, despite the fact that it fails to comport with the ESA in two important ways. First, the Mexican Wolf Recovery Plan does not contain “objective, measurable criteria which, when met, would result in a determination...that the species be removed from the list.” Second, the Recovery Plan does not contain a detailed scheme for fully recovering Mexican wolves throughout all or a significant portion of their historic range, *i.e.*, an actual plan for delisting the subspecies.

We request that the USFWS put its efforts into establishing a new recovery plan and that recovery planning be immediately reinitiated.

Conflicts with Livestock

The Gila and Apache National Forests comprise 95% of the BRWRA. The failure of the BRWRA reintroduction project to meet the objective of establishing a viable, self-sustaining population of at least 100 Mexican wolves by about the end of 2006 has been caused primarily by conflicts between wolf population restoration and livestock operations. The management and policy responses by the USFWS- and the lack thereof from the Forest Service- that have resulted in unsustainable levels of lethal control and permanent removals of Mexican gray wolves, when both agencies should and can require more of the livestock interests that have permits on our public lands.

Mexican wolves have been the big losers in this conflict resolution as they are often killed or permanently removed – 58 Mexican wolves have been permanently removed from the BRWRA for

conflicts with cattle. Indeed, more wolves have been removed for such conflicts than for any other reason.

The Forest Service has done little if anything to reduce conflicts with livestock grazing in and around the BRWRA, despite the fact that there are cattle throughout these lands making wolf-livestock conflicts inevitable. It has implemented no conservation programs or policies to reduce wolf-livestock conflicts or to require the permittees to do more to actively manage their livestock. The Forest Service has hidden behind the experimental nonessential classification in such a manner as to absolve it of any legal obligation to consider the conservation and recovery of this subspecies- or potential harms to this subspecies- in its management and policy decisions.

Reclassifying the Mexican gray wolf subspecies to endangered, as mentioned above, and thus fully protected under the ESA would cause the Forest Service to formally consult with the USFWS on its proposed actions. Restoring the consultation requirement for this population would also cause the USFWS to evaluate how the actions of other federal agencies may be impacting the Mexican wolf, and to issue formal biological opinions as to those impacts.

Socioeconomic Aspects of Wolf Reintroduction

The analysis of the socioeconomic impacts of the Mexican gray wolf in any future NEPA analysis should recognize the non-market benefits of wolf reintroduction and recovery and go beyond merely looking at the local and regional benefits. The Environmental Impact Statement relating to the reintroduction of gray wolves in Yellowstone National Park and Central Idaho included an estimate non-market benefits which resulted in a net economic value of the reintroduction of between 6.6 and 9.9 million dollars each year. The Stated Preference technique was used to derive some aspects of these data. Every effort should be made to gain a full picture of the benefits provided by the wolves in the wild.

Other Issues

There is current research, Frankham (2007) entitled *Genetic Adaptation to Captivity in Species Conservation Programs*, which calls into question the viability of maintaining wild animals in captivity and ensuring that they keep the characteristics that ensure their success in the wild. The evolutionary processes and adaptations by captive populations can limit their ability to reproduce and survive in the wild. That means we do not have another 20 years to figure this out and that the USFWS should act aggressively to make the changes necessary to ensure the conservation of Mexican gray wolves in the wild.

Given the recent issues with the possible baiting of Mexican gray wolves by certain livestock interests, expanding that management regime to domestic animals such as dogs is short-sited at best. As with other wildlife-domestic animal conflicts, the owners of the animals should take responsibility and adjust their behavior when in the wolf recovery area. That means keeping animals inside of in pens at night and keeping animals leashed when traveling in areas that wolves are known to inhabit. Allowing the take of wolves for additional domestic animal conflicts will only compound the problems with the current program and hinder the establishment of a sustainable population of wolves in the wild.

Please keep us informed about any developments or issues relative to this process and important program to recover the Mexican gray wolf.

Sincerely,

A handwritten signature in cursive script, appearing to read "Sandy Bahr".

Sandy Bahr
Conservation Outreach Director
Sierra Club – Grand Canyon Chapter

RECEIVED

DEC 21 2007

USFWS-NMESFO

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

Mr. John Slown, I am sure that about this time you have heard pretty much all the issues and reasons why the Mexican wolf needs help in the introduction recovery program. I am also aware that you are not only dealing with environmentalist, but with the general public and the directly affected; the ranchers, not to mention any political reasons.

I am just another citizen that is concern with our environment and the impact that in the long run we humans will have on it. I would like to site some of my concerns and maybe solutions to some of these issues.

- Include a "Conservation Alternative" that will change the classification from experimental, nonessential- to "experimental, essential or endangered" to give wolves more protection.
- Expand the territory were wolves roam and eliminate all restrictions to wolf dispersal and movements
- The area called "Blue Ridge Recovery Area" is very small and puts wolves in a very tight position and possible contact with other wolves already in the area at the beginning of their release. Expanding the Area of releases should be a priority.
- There is a program that Game and Fish is using apparently with success, as I was told by Bill Van Pelt at the Phoenix public meeting, and is giving hay to the ranchers so they can feed their cattle in specific areas of their ranches, so that way they can keep a close watch in to their livestock.
- Stop the killing and removing of wolves: reduce the 'take", killing is not a solution; otherwise we would may as well just wipeout all animals that bother us.
- The recovery plan is out of date. The Fish and Wildlife shouldn't attempt to change the rule before recovery has been defined for Mexican Gray wolves. The change should be concurrent with this rule so that rule changes do not interfere with future recovery actions.

- Expand the number of wolves in the wild population. There is a Minimum objective for the BRWRA population of wolves. Recovery still needs to be defined through revision of the recovery plan.
- The recovery options should be open so that way does not limit in any way future options for the recovery of Mexican gray wolves anywhere outside boundaries pf the BRWRA.
- Try to workout solutions with the many conservation groups interested in help in resolve this problem. I am sure there is a way to help coordinate all the resources and the people interested and you are in the best position of doing it.

I would like to thank you for the attention to my letter, hoping that my insight in some way could have been of any help. You are now in a grand position of power and responsibility not just to the people now but to the future generations.

Thank you again,
Attn: Belem Villaescusa.
808 E. Aire Libre
Phoenix, AZ

December 30, 2007

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

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JAN 02 2007
USFWS-NMESFO

RE: Mexican Gray Wolf NEPA Scoping

Dear Sir:

Thank you for taking time to attend the recent meeting held in Phoenix on December 8th and for patiently answering the same questions repeatedly for those of us who attended. After talking with representatives from every agency and reading the information made available, I have several comments:

- 1) Allow the wolves to expand their territory throughout their historic range and eliminate all restrictions to wolf dispersal and movements. Under the existing rule, wolves that move beyond the BRWRA boundary are captured and relocated back into the Blue Range. According to wildlife biologists, this practice disrupts pack formation, interferes with the natural dispersal of the population, limits genetic diversity and sometimes results in injury or death of individual wolves. In the revised rule, there should be no exclusion of geographic areas from potential occupation by wolves and new areas of good wolf habitat such as Arizona's "Sky Islands" mountains and the Kaibab plateau near the Grand Canyon should be considered for inclusion in the WRA.
- 2) Allow for direct reintroduction of wolves from the captive population into New Mexico. The area for initial releases should be expanded to anywhere within the Blue Range Wolf Recovery Area. The current provision severely limits wildlife managers' options for meeting the BRWRA objective of a viable, *genetically diverse*, self-sustaining population of at least 100 Mexican wolves.
- 3) Revise the Recovery Plan so that it requires conservation and full recovery of Mexican wolves under the Endangered Species Act. Include a "Conservation Alternative" that will change the classification from "nonessential experimental" to "endangered" or "experimental-essential" since the current classification is hindering their recovery. An "endangered" designation will give the Blue Range population of Mexican gray wolves the stronger protections they need to succeed in the wild.
- 4) Expand the number of wolves in the wild population. A viable, self-sustaining population of at least 100 wolves should be the *minimum* objective for the BRWRA population of wolves. No maximum should be set for the number of wolves in the wild through this rule change. The Mexican wolf should be allowed to fill its niche as a keystone species within its natural habitat.

5) Reduce "take"; stop killing and removing wolves when they prey on livestock. The existing rule is allowing too many wolves to be removed or killed because they are succeeding at living as wild wolves in an ecosystem in which they are a top predator. Wolves were slaughtered to near extinction at public expense for the sake of the livestock industry. The current provision just continues this policy. Wolves should only be removed (never killed, unless as a last resort) if they pose a direct threat to human life, not a rancher's wallet. From the beginning of the Recovery Project in 1998, there has been a system in place to reimburse livestock growers for losses proven to be from wolf depredation. Regardless, at least one rancher claims to have "sacrificed" three animals in order to have the wolves on his permitted land removed. A revised rule must require livestock-wolf conflicts and human-wolf conflicts to be resolved in ways that keep wolves in the wild and achieve progress towards reintroduction objectives. Ranchers using public lands must be required to remove or render inedible the carcasses of livestock before wolves find and scavenge on them. Likewise, as urban areas sprawl into historic wolf ranges and the urban-wildlife interface increases, the public must become educated about living in proximity to wolves and other predators. Truth, not myth, must underlie future interactions with wolves and any rules pertaining to "harassment" of wolves must promote keeping Mexican gray wolves in the wild and insuring their continuation as a species.

Finally, the current management rules do not adequately safeguard the Mexican wolves from extinction in the long-term. *At best, there are only a few hundred individuals of this endangered subspecies existing on the planet* and captive populations cannot guarantee the species survival. Politics is the primary reason for the near extinction of Mexican wolves in the first place and politics is the reason the Wolf Recovery Project has only been partially successful in its mandate to re-establish "a viable, self-sustaining population of at least 100 Mexican wolves." The political clout of livestock interests and others who object to wolf recovery is disproportionate to the numbers of people actually impacted. A large percentage of both primary and secondary recovery zones is public land and the Mexican wolf reintroduction program and the Endangered Species Act, under which it is managed, enjoy wide public support. Public land use for personal gain by livestock interests is a privilege (for which they are heavily subsidized by taxpayers), not a right. Continued use of the public lands by livestock interest or any other groups should be predicated upon cooperation with, if not support for, wolf reintroduction. We cannot allow the survival of any species to be determined by profit motives. The Mexican gray wolf Recovery Project must be managed on the basis of the best science available--not politics or economics--and the new rules must guarantee the long-term survival of this endangered species.

Sincerely,



Lynn Ashby
3748 E. Sheridan
Phoenix, AZ 85008

4723 N. 39th Drive
Phoenix, AZ 85019
3 JAN 08

U.S. Fish & Wildlife Service
ATTN: Wolf Program
New Mexico Ecological Service Field Office
2105 Osuna NE
Albuquerque, NM 87113

Dear Sir,

After reading the enclosed editorial in the Arizona Republic, I was encouraged to write your office and give my support to the Wolf Program. I am now a retired firefighter but in my younger days I was a cowboy and I have hunted and fished all my life. I admit I was always shooting at a pile of steaks when deer hunting because we ate everything I got.

During the 1960's I recall news articles about a big Wyoming sheep rancher who flew around his ranch in a helicopter shooting eagles. He obviously couldn't stand the loss of a few lambs but could afford the helicopter. Unfortunately? he died of a heart attack before the Government could bring him to trial.

Once when I was admiring some Red Winged blackbirds to a relative who was a South Dakota farmer, I was told that each blackbird ate \$75.00 worth of grain each year. I didn't bother to point out that Red Winged blackbirds had existed for thousands of years before South Dakota farmers grew crops (I didn't want to see a big question mark over his head the rest of the day). I have no political influence whatever nor do I have much money. I do know that too many affluent people would kill before spending an extra five dollars a year for wildlife of any kind and some ranchers and farmers would not want anything bigger than a wood mouse eating up their annual profits.

I have a vocabulary of profanity that any Army Drill Sgt. would be proud of but I am at a loss for words to describe my distaste for people who do not like to see wildlife reintroduced that we foolishly tried to exterminate in the past.

Yours truly,


Wayne Rexroat

enclosure

December , 2007

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 request that the US Fish and Wildlife Service take actions to better protect the endangered Mexican gray wolf. I encourage you to include a Conservation Alternative in the draft Environmental Impact Statement that will change the classification of the wolves from "experimental, non-essential" to "experimental, *essential*" or "endangered" to give wolves more protection. These wolves are essential to the long-term recovery of this endangered subspecies; captive populations will not safeguard Mexican wolves from extinction in the long-term.

Furthermore, I ask that you eliminate restrictions to wolf dispersal and movements. Wolves have large area requirements and need access to good habitat throughout their historic range. Capturing and relocating wolves that wander from the current arbitrary boundaries disrupts packs, thwarts expansion and dispersal of the population, and sometimes causes serious injuries to individual wolves. I would also like to see you expand the area for initial releases to anywhere within the Blue Range Wolf Recovery Area.

The US Fish and Wildlife Service must also stop killing and removing wolves. The current rule allows excessive wolf removal that is precluding achievement of the reintroduction objective of 100+ wolves in the recovery area.

Finally, please revise the Recovery Plan. The Recovery Plan is terribly out of date and has not been amended for 25 years. It does not include objectives for full recovery of Mexican gray wolves, an essential element for any recovery plan.

Thank you for considering my comments.

Sincerely, *Joanne Piergallini*

(Include your name and address. They will not count your comments without an address.)

2738 E. Rock Wren Rd.

Phoenix, AZ 85048

A note from

Mr. John Pamperin

Administrator Millsap:

I am writing to you to express my concern over the proposed changes in the Mexican Wolf Recovery Program.

As you know, the objective of the program back in 1998 was to establish a population of 100 wolves in the wild by the end of 2006. There were only 59.

As you also may know, cows are the reason. With nearly 70 wolves removed from the wild, having died as a result of recapture or were purposely killed by the Agency charged with protecting the



USFWS

To remove cattle-killing wolves from the wild is not fair, the ranchers don't lose money because they are compensated for any loss by the Defenders of Wildlife. They can also do AID to prevent depredation.

The ranchers should be required to remove dead cattle from the wolf recovery area or treat the carcasses with lime to make them inedible.

As you know, they are not.

Mexican wolves in the program are considered to be a "non-essential, experimental" population, which allows the U.S. F. & W. S. to write rules that override the usual protections that endangered species enjoy. This makes wolves easier to kill.

Wolves were brought to the edge of extinction long ago by a federally funded program that benefited ranchers. The times have changed. Ranchers can choose to be part of the future to improve the overall health of the ecosystem or they can get out of the way, but they should NOT be allowed to undermine it.

I feel the U.S. F. & W. S. attitude toward wolf recovery needs to reflect the public's desire to restore these predators to their natural home in the wild.

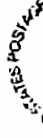
I hope you will consider these comments in your deliberations. Thank you. Sincerely,

John Pampin



Julian F. Panjwani
2401 W. Auguste Ave. Room
Phoenix, AZ 85021

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193
4491 # 00.410 PB8534484
6906 MAILED FROM PHOENIX, AZ 85045



BRIAN MILLS App, State Administrator
U.S. Fish & Wildlife Service
N.M. Ecological Services Field Office
2105 OSUNA, N.E.
ALBUQUERQUE, N.M. 87113

8711381001 RB01



FRWD

December , 2007

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

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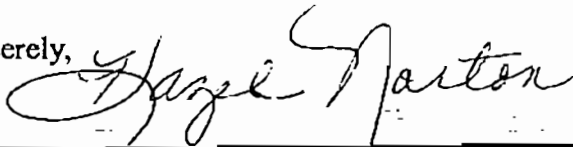
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Finally, please revise the Recovery Plan. The Recovery Plan is terribly out of date and has not been amended for 25 years. It does not include objectives for full recovery of Mexican gray wolves, an essential element for any recovery plan.

Thank you for considering my comments.

Sincerely,



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

Mr. Millsap:

The wolf is probably one of the most misunderstood animals. As you know, they have their own way of keeping their own population in check with the Alpha male & female being the only procreators of the pack. The wolf is a territorial animal and they don't mind taking out a rival pack which can often include the puppies of the rival pack.

I realize that farmers and ranchers have reservations about the wolf so as to safeguard their sheep, cattle, and other livestock. They do have a right to protect their herds.

Many years ago, when I lived in Minnesota, the authorities had corralled a huge herd of deer near Arden Hills. What were they to do with these animals? The hunting season was apparently over for the year so no hunter could have a permit to shoot any of these poor starving animals. Where was the wolf? Had it been hunted to near extinction?

Nature needs the wolf to keep balance and to allow a healthy ecosystem to flourish. I'm not a "tree hugger" nor am I a hunting enthusiast. I don't believe in killing for "sport"[for the sake of killing] I do feel that since the U.S. Fish & Wildlife imitated the saving of this wolf, it should continue its efforts to help this beautiful creature survive.

Sincerely,



Victress I. Jenkins
2524 N 22nd Dr #39
Phoenix AZ 85009-1959
602-253-6803
vjenkins7@cox.net