

11/24/07

Judith A. Raymond
10515 E. Kay GARTRELL PL.
TUCSON, AZ 85747

ATT: Mexican Gray Wolf NEPA Scoping

MR. BRIAN MILLSAP, STATE ADMINISTRATOR
US Fish & Wildlife Service
NM Ecological Services Field Office
2105 OSUNA NE
ALBUQUERQUE, NM 87113.

Dear MR. MILLSAP:

I support wolf rearing programs in
New Mexico and Arizona.

Thank-you,
Judith A. Raymond

U
✓
✓
RECEIVE

NOV 26 2007

INS-NMFC 21 November 2007

Thank you for postcard! I
would like to save all ~~the~~ animals!
Anyway - please send info on

Mexican Gray Wolf

so that we can correct mistakes of the
past -

send to

Elise M. Paulsen
325 E. Kelso Street
Tucson, AZ 85705

I cannot attend Dec 7 meeting
in Tucson.

Thank you for your
efforts.
Elise

520-207-4221

Lifeline

Dr. Gregory K. ~~REDACTED~~ ~~TOH~~ / 4

CHIROPRACTIC & APPLIED KINESIOLOGY P.C.

NOV 28 2007

Brian Milsap,
I believe that we need to continue ^{W.S.-N.M.F.} efforts to establish the wolf in Arizona and New Mexico. As long as ranchers are compensated for losses by a public or private fund the positive aspects outweigh the negative ones.

Sincerely,
Gregory K. P. L. D. D.

6563 E. 22nd

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.mexicanwolfs.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.

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USFWS-NMESFO

Comments:

Dear Mr. Slawn,
There are several things I would like you to do to protect Mexican Gray Wolves.

- Please change their classification to "experimental, essential."
- Allow them to expand their territories and eliminate restrictions on wolf dispersal and movements.

• Expand the area for releases to the entire Blue Range Wolf Recovery Area.

- Resolve wolf-livestock conflicts in a way that will not be detrimental to wolves.

• Please stop killing and removing wolves. Redman "take."

- Revise the Recovery Plan.

- Increase wolf populations
- Keep future recovery options open.

In a nutshell, please act in the best interest of the wolves. They are vital to our ecosystem, as is every other animal, plant or bug.

Thank you for your time.

Name: Carrie Gayne
Street: 2650 W. Norton Ave.

City, State, Zip: Tucson, AZ
85719

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

DO NOT STAPLE
Thank you for your input!

12-08-07

Att: Mexican Gray Wolf NEPA regarding
Brian Millsap, State Administrator
U.S. Fish & Wildlife Service
New Mexico Ecological Services Field Office
2165 Corona NE
Albuquerque NM 87113
Sirs:

It is so discouraging to see a rule change
that chips away at protecting the gray wolves
of Arizona & New Mexico. We need to
share our land with nature,
Let us not take a step backward
Sincerely,

Eula K. Wheeler



Mrs. Eula K. Wheeler
4730 N Via Sonrisa
Tucson, AZ 85718



**Western
Watersheds
Project**

Arizona Office
PO Box 2264
Tucson, AZ 85702
Email: Arizona@westernwatersheds.org
web site: www.westernwatersheds.org

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DEC 19 2007

USFWS-NMESFO

Working to protect and restore Western Watersheds

December 17, 2007

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

RE: Mexican Gray Wolf NEPA Scoping

Dear Mr. Slown,

Thank you for providing the public with the important opportunity to submit comments on the Mexican gray wolf reintroduction plan amendments and the proposal to prepare a socio-economic analysis to revise the listing of the wolf under the Endangered Species Act. These comments are submitted on behalf of Western Watersheds Project, a non-profit conservation organization that dedicated to protecting and improving wildlife habitat, riparian areas, water quality and other natural resources and ecological values throughout the West. We have over 1,600 members nationwide and, as an organization and on behalf of our members, are concerned with protecting and improving wildlife habitat and the ecological integrity of watersheds, including the lands of the southwest and within the current Blue Range Wolf Recovery Area ("BRWRA").

We have also endorsed the comments of The Rewilding Institute, and incorporate by reference the thorough comments submitted by that organization. We submit the following comments on the proposal to revise the rule.

We concur that the current reintroduction effort isn't working. The current program is an effort marred by lethal and permanent removals of wolves from the wild, accidental killings during the recapture program, and emotional public debate based on imagined threats these creatures bring to communities. It is time that the agency take an honest look at the cause and effect of the failures to establish a viable Mexican gray wolf population thus far.

REVISE THE RECOVERY PLAN

We believe that the first and foremost concern of the agency should be the revision of the Mexican gray wolf recovery plan, which is already 25 years old. The recovery team could review the best available science and make recommendations to the FWS as to the recovery requirements of the species, including whether the listing rule revision should occur. It seems a logical first step,

management agencies – namely the USDA Forest Service and the BLM- could include wolf recovery actions that would be applicable for grazing permits administered by those entities.

To date, the reintroduction of the Mexican gray wolf in the BRWRA has not required any changes in livestock management on public lands within that same area. In fact, many of the wolf management provisions of the current reintroduction plan proscribe elements designed to reduce economic harm to the livestock operators (such as the “three strikes” provision). This is an inappropriate perspective.

The new rule should emphasize that livestock operations on public lands are a privilege, not a right, and conflicts between the extractive use and the native wildlife should be remedied on the side of wildlife. The new rule should also stipulate specific management and mandatory cooperation from the USFS and BLM, such as the following measures to reduce wolf-livestock conflicts:

- **Eliminate open-range calving by livestock.** Public lands ranchers should be required to confine pregnant cows and calves until they are of sufficient size and health to fend for themselves in the untended backcountry that is prime wolf habitat. Expecting wolves not to be attracted to young, weak animals is to go against their natural instinct. Ranchers should not expect to defy the laws of nature by tempting wolves with unmonitored livestock births.
- **Avoid turn-out of domestic livestock in are near areas known to be used by wolves.** The high number of collared animals and the notification system by the FWS should be improved to help determine livestock turn-out. Livestock should be managed in ways that recognize seasonal changes in the wolves’ behavior.
- **Remove or render unpalatable livestock carcasses.** Preying on livestock is likely a learned behavior. It is obvious from past depredations that scavenging on dead livestock is one of the reasons wolves see cattle as prey. Livestock operators within the recovery area should be required to take responsibility for prompt carcass management and disposal.

These few simple measures should be mandatory terms and conditions added to grazing permits within the recovery area. Incorporating these measures into the new EIS should provide the agency with a reasonable range of alternatives, as required by NEPA.

PROVIDE A FAIR SOCIO-ECONOMIC ANALYSIS

The socio-economic analysis that will be completed as part of this new EIS should not overly emphasize the “hardships” to livestock operators. Livestock operations on public lands are heavily subsidized by federal and state money, and the handful of ranchers who are affected by wolf depredations are already compensated fairly for their loss from a private organization. The socio-economic analysis should attempt to quantify the priceless experience of hearing a wolf howl in the wild and the value of reintroduction and recovery on the ecosystem to the broader American public. Restoring predators in the ecosystem may have the effect of eliminating the need for vegetation treatments in the long-term. This type of effect should be included in the calculation; the price of lost heifers should not be the only economic data the FWS considers.

We are concerned that the scoping meeting comment forms included both a photo of cattle and photos of ranchers. The socio-economic analysis should include broader social groups- wolf supporters, wildlife photographers, river guides, campers, hikers, biologists- who also have vested interests in this program. The FWS should undertake appropriate social survey if it expects the

socio-economic analysis to be fair and unbiased, and scoping meetings and materials should also strive to limit the emotional pandering to special interest groups.

EARMARK FUNDING FOR BUY-OUT

We recognize that one way to permanently dissolve the livestock-wolf conflict is to remove livestock operations from public lands. Therefore, we support the inclusion of funds in the reintroduction program to buy out voluntarily relinquished grazing permits within the recovery area. Elsewhere, livestock operations are being bought out by federal and private interests for the sake of improving monument values and wilderness conditions. Here, grazing permits could be purchased upon voluntary relinquishment and permanently retired for the sake of recovering the Mexican gray wolf. The reevaluation of the listing rule should incorporate this kind of thoughtful and long-term solution to the livestock-wolf conflict in at least one of the alternatives.

EXPAND RECOVERY AREA

The cessation of confinement of wolves to the BRWRA should be considered in the new EIS. Currently, wolves roaming outside of the BRWRA are threatening by the risk of recapture and relocation. In order for the wolves to successfully re-inhabit in the southwest, the wolves themselves should be permitted to determine what their home range is. The current territory is insufficient to restore a healthy wolf population, and the current recapture and re-release programs are harmful to the recovery of the species. The arbitrary boundary of the BRWRA undermines the Endangered Species Act's purpose of protecting and restoring endangered and threatened species and the ecosystems upon which they depend. 16 U.S.C. § 1531(b).

Thank you again for the opportunity to submit these scoping comments. Please keep us apprised of all future opportunities to participate in the Mexican gray wolf planning process.

Sincerely,



Greta Anderson
Western Watersheds Project
PO Box 2264
Tucson, Arizona 85701
www.westernwatersheds.org

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U. S. F. W. S. 2007

John Slown **ATTN: Mexican Gray Wolf NEPA Scoping**
US Fish & Wildlife Service
New Mexico Ecological Services Field Office
2105 Osuna NE
Albuquerque, NM 87113

USFWS-NMESCFO

Dear Sirs:

The following comments pertain to the changes on rules governing the Mexican gray wolf reintroduction project.

My wife and I have camped and hiked in the Alpine & Blue Range area many times over the years and are thrilled that wolves inhabit the area. Their presence is a major factor in our visiting this area.

Since the current reintroduction program seems to be at an impasse because of a few ranchers bent on wrecking the program and given recent reports of wolf baiting by some ranchers, I think major changes are necessary to the rules:

1. Change the "experimental, non-essential classification" to "endangered" or "experimental, *essential*" with the full protection and enforcement of the law
2. Retrieve radio telemetry receivers from ranchers and change the current frequencies that are used.
3. Expand the initial release area to anywhere in the Blue Range Recovery Area. Eliminate all restrictions to wolf dispersal and movements.
4. Stop killing wolves!
5. Revise the 25 year old recovery plan and make no rules which would limit future recovery plans.
6. Penalize ranchers for leaving dead livestock carcasses in the recovery area. This practice is incompatible with reintroduction.
7. Formalize a compensation program for ranchers.
8. Expand the number of wolves in the wild.
9. Conduct research to determine how the presence of wolves has changed the ecosystem (such as reducing the number of coyotes, strengthening elk & deer herds, etc.)

Thank you for your consideration of these remarks.

Hal Williams
2249 E. 2nd St.
Tucson, AZ 85719
hwilliam@seds.org

FAX

505 346 2542


Attn: Mexican Gray Wolf NEPA Scoping

Gran Millsap, State Administrator
US Fish and Wildlife Service New Mexico Ecological Services Field Office

From:
Mary Hoover
8226 N. Painted Feather Dr.
Tucson, AZ 85743

Please do not de-list the Mexican gray wolves. Anything that you can do to protect them and encourage their development and thriving would be appreciated. As a daughter of a farmer/rancher, I know that cattle can be threatened, but we must balance nature and livestock. At this point, I favor the ongoing support of the gray wolves until it is clear that they are well established beyond the point of possible extinction. Much hard work and many dollars have gone into reintroducing and/or keeping alive gray wolves. Let's not let this go down the drain. Thanks for your consideration.

Sincerely,


Mary Hoover

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

December 19, 2007

Dear Mr. Millsap,

I am writing to express my support for the Mexican gray wolf recovery program and the need to update measures to promote a viable Blue Range wolf population. Please listen to your expert wolf biologists and their recommendations for reforming the program. While I'm sure this is a difficult program to administrate, it's extremely important that the Mexican wolf program succeed.

In the 1980's I studied the breeding pair of Mexican gray wolves at the Arizona Sonora Desert Museum. They are one of the most fascinating and valuable forms of wildlife we have.

Please consider my support of the recovery program and updating the plan in light of scientific expertise so that it may succeed for the wolves and for the entire ecosystem.

Respectfully,



Janet Emel
1953 W. Calle del Ocio
Tucson, AZ. 85745

How to Submit Comments

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Comments:

I AM A 3rd-generation FUSONIAN who has also worked AS A '04 student Employee for the Forest Service in the Apache-Sitgreaves National Forest, I AM strongly in favor of the current wolf re-introduction program because it is exactly the sort of ecosystem recovery mitigation that is needed - on so many levels to promote a healthy natural habitat. Through the viewpoint of my strong support of this program these are the suggestions I have for the main issues put forward for the renewal of the 1998 1069 bill -

In terms of the introduction of wolves into the white mounds missile area, this should proceed

As the land is available. - With the amendment on the rules for wolf kills please consider making more stringent regulations for a kill, and the loopholes that allow this to happen.

- Although Ranchers are an important part of the economy there would be ways to mitigate conflicts like radio collaring instances however. Ranchers should be required to allow this program to continue, especially considering the abusive steal that many ranchers perform. Land is a major Name: Matt Sweeney

Street: 1010 N. Jones Unit

City, State, Zip: Fusion, AZ

85716

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

DO NOT STAPLE
Thank you for your input!

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

29 December 2007

Please accept my comments for the draft environmental impact statement (EIS) and socio-economic assessment and a proposed rule amendment to the 1998 final rule that authorized the establishment of a "nonessential experimental population" of Mexican gray wolves in Arizona and New Mexico.

Since this classification is hindering their recovery, I request that you give the Mexican gray wolf full endangered status.


The present "nonessential experimental" designation allows for wolves to be killed or recaptured for a variety of reasons including preying on livestock (for which the owners are already compensated) or straying outside the recovery boundaries. I would like to see the rule amended to allow for conservation of the Mexican gray wolf as required by the ESA. It is clear the current classification is hindering their recovery so • I request that you classify these wolves as "endangered".

Presently, wolves can only be reintroduced directly into the primary reintroduction area in Arizona and cannot be reintroduced directly into New Mexico. • Please change this to allow for direct introductions into New Mexico.

The original goal was that of "re-establishing a viable, self-sustaining population of at least 100 Mexican [gray] wolves" (U.S. Fish and Wildlife Service 1982, p. 23). The current management stipulations require wolves that have established home ranges outside the Blue Range Wolf Recovery Area (BRWRA) be removed and re-released into the BRWRA or taken into captivity. This aspect of wolf management has been counterproductive to the stated goal. • Thus I also ask that the rule be amended to allow wolves to establish territories outside the boundaries of the current recovery area.

All of these considerations show that the wolves need stronger protections and more room to roam. • I strongly object to provisions that allow livestock interests or others who object to wolf recovery to "take" (i.e. kill) wolves. (Killing the animals is already allowed if an individual feels threatened, as unlikely and uncommon as that is.) And, as mentioned above, ranchers are already reimbursed in the case of livestock being killed by a wolf.

Sincerely yours,


Roy M. Emrick
2220 N. Norton Ave,
Tucson, AZ 85719-3831

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Comments:

The Mexican wolf was exterminated completely in the southwestern states. It should have full endangered species protection. The reintroduction program has not been doing well for several reasons.

There is too small an area for the reintroduction so wolves will wander out or inbreeding will occur.

Ranchers are not cleaning up livestock carcasses which will attract wolves.

The Mexican gray wolf belongs in the wild & perhaps Ranchers should learn to share the land -- it is public land after

all.

Please increase the recovery areas and remember the land is

for all people to enjoy - including future generations. These animals nearly became extinct because of past actions by the government. We should do everything possible to harness the reintroduction program. succeed. Thank you,

Pam Ensign

Name: PAMELA ENSIGN

Street: 2055 E MIRAVAL

QUINTO

City, State, Zip: TUCSON

AZ 85718

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

DO NOT STAPLE
Thank you for your input!

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USFWS-NMESFO

How to Submit Comments

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USFWS-NMESFO

Comments: I would like to express my strong support for the Mexican gray wolf reintroduction project. My husband and I spend time in the Alpine, Ariz. area, and drive and hike in the Blue Range. We hope someday to be lucky enough to hear a wolf howl, or perhaps even glimpse one.

I am concerned that the population is well below the projected numbers. It is obvious that changes are needed to improve recovery. The rules should include a Conservation Alternative to change the classification to "experimental, essential", which has been provided for by Congress and would give stronger protection. Also, 100 wolves is the minimum objective for a self-sustaining population; there should be no maximum number of wolves set in the revised recovery plan.

It is obvious that the wolves need to be allowed to expand their territory. They require large areas in order to have good habitat, and are unaware of maps, capturing and relocating wolves who leave the Blue Range disrupts packs and has caused injuries to individual wolves; it also takes biologists' time away from other duties. In addition to allowing wolves to expand their territories, a rule change permitting new releases throughout the Blue Range, including New Mexico, would provide necessary management tools for increasing genetic diversity among the New Mexican population.

The revised rule must require owners of livestock on public land to remove or render inedible (ie, with lime dead stock so wolves do not scavenge them. Fish and Wildlife Service data show that livestock form only 4% of the wolves' diet. This small percentage does not justify removing wolves.

The Recovery Plan has not been amended for 25 years. It needs revision to define recovery for Mexican wolves so rule changes do not limit future options for recovery. Wolves are part of our heritage.

Name: Catherine Williams

Street: 2249 E. 2nd St.

City, State, Zip: Tucson, AZ
85719

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

DO NOT STAPLE
Thank you for your input!



**SKY
ISLAND**
ALLIANCE
Protecting our Mountain Islands
and Desert Seas

F A X

DATE: December 31, 2007

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

FAX # (505) 346-2542

RE: Mexican gray wolf NEPA scoping

FROM: Janice Przybyl
Wildlife Linkages Program Coordinator
Sky Island Alliance
P.O. Box 41165
Tucson, AZ 85717

Phone: (520) 624-7080 x15
Email: janice@skyislandalliance.org

No. Pages: 5 including this one

COPY OF E-MAILED COMMENTS
(Did not receive confirmation that email was received.)



SKY
ISLAND
ALLIANCE

Protecting our Mountain Islands
and Desert Seas

December 31, 2007

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: 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 Dr. Millsap:

Please accept this letter as Sky Island Alliance's comments on the proposal to revise the ESA section 10(j) rule that established and governs the management of the nonessential experimental population of Mexican wolves in the Blue Range Wolf Recovery Area. Sky Island Alliance is a grassroots organization dedicated to the protection and restoration of the rich natural heritage of native species and habitats in the Sky Island region of the southwestern United States and northwestern Mexico. Sky Island Alliance works with volunteers, scientists, landowners, and government agencies to establish protected areas, restore healthy landscapes, and promote public appreciation of the region's unique biological diversity.

The Mexican gray wolf (*Canis lupus baileyi*) is a native species of the Sky Island region and an important part of our natural heritage. We strongly support the recovery of the Mexican wolf to appropriate habitat throughout the region. We believe the success of wolf recovery in the southwest must be science-based and must involve cooperative efforts between federal, state, tribal, and private landowners. Our goal is to work with scientists and landowners to support wolf recovery, and, in particular, to assist public and private landowners who wish to protect or enhance wolf habitat. We support the elimination of the current boundary restrictions for the wolf. The wolves should be able to go where appropriate habitat allows, following prey. Sky Island Alliance supports release of wolves on public lands and private or tribal lands where landowner support is strong and recovery goals clearly warrant such actions. Given such

RE: Mexican gray wolf scoping comments, 2007

page 2

parameters, we recommend that it is unnecessary to maintain or further reinforce the artificial geographical boundaries that currently restrict recovery efforts.

According to the United States Fish and Wildlife Service (USFWS), 90 wolves have been released since 1998. Today, however, only 50 some wolves remain in the wild, a result of nine years of recapture, relocation, and lethal removal. If a wild population of Mexican gray wolves is to persist on the landscape, major changes must be made to the recovery program. Sky Island Alliance submits the following recommendations and comments:

✓ **The Blue Range Wolf Recovery Area Boundary (BRWRA) boundary rule should be eliminated**

According to the Mexican Wolf Reintroduction Project Five-Year Review, the dominate factor influencing the persistence of wolf on the landscape is not mortality, but rather removal. The high rate of Mexican wolf removal, whether lethal or live capture for placement into captivity, is often the direct result of wolves dispersing beyond the recovery boundary. If removal rates are combined with mortality rates to formulate a failure rate, Mexican wolves are not persisting on the landscape. As such, existing boundaries are counterproductive to long-term recovery goals for Mexican wolves. The small size of the primary recovery zone and the restriction of wolves to the BRWRA are hindring recovery of a self-sustaining and viable population of Mexican wolves. The natural dispersal of wolves outside the recovery area boundaries is required if the population is to be viable.

✓ **Allow direct release of wolves into New Mexico**

Currently wolves from the captive breeding population can only be released into the primary recovery zone in Arizona. Mexican wolves can inhabit New Mexico though natural dispersal from Arizona or via relocation of captured wolves because of nuisance issues. The latter cause is problematic because only those wolves that have been captured one or more times previously may be released into New Mexico. This restrains the agency from making decisions on where to release wolves based on science and habitat, and may increase the number of "problem" wolves within New Mexico. The Gila and Apache National Forests are inherently connected, and we believe that each state should have equal opportunity to release new or re-captured wolves as appropriate. Therefore, we strongly recommend the dissolution of the rule restricting releases in New Mexico.

✓ **No cap on the number of wolves in wild**

The current rule sets a population goal of 100 wild wolves in the BRWRA. Today's wild population consists of less than 60 individuals, well below the stated goal. Science does not warrant an artificial cap on the number of animals allowed to inhabit any particular area. Combined with our recommendation of dissolving the recovery area boundary, we cannot recommend any limit to the number of wolves allowed to exist in the wild. Our main concern is whether the wolves are fulfilling their role as a natural component of the ecosystem, and thus we believe that aside from significant points of conflict, the ecosystem is the best indicator for how many wolves can be supported within the region. Therefore, we recommend the new rule should not contain a cap on the maximum number of wild Mexican gray wolves.

✓ **White Sands Missile Range eliminated as “reintroduction” zone, but remains potential dispersal habitat**

White Sands Missile Range may not contain appropriate habitat for reintroduction or provide prime Mexican gray wolf habitat. However, when recovery boundaries are eliminated White Sands Missile Range could provide a “stepping-stone” dispersal route for wolves moving to other suitable habitat.

✓ **Maintain limited provisions for private individuals to “harass” wolves**

Currently there are provisions for private individuals to “harass” wolves engaged in nuisance behavior or livestock depredation. Based on the USFSW request for exploration of all possible alternatives and remedies to deter problem wolves, we support non-lethal and non-injurious harassment of Mexican wolves engaged in nuisance behavior or attacking livestock or pets, but do not support any permission to kill wolves that are not posing an immediate physical threat to an individual or livestock at this time.

✓ **Definition of “breeding pair”**

Definition of “breeding pair” should remain the same as written in the 1998 final rule: an adult male and an adult female wolf that have produced at least two pups during the previous breeding season that survived until December 31 of their birth year.

✓ **More releases of Mexican wolves from the captive breeding program**

Currently there are approximately 300 Mexican wolves in 48 breeding facilities in the United States and Mexico, with approximately only 59 wolves in the wild. The recovery program is operating on the premise that the captive population can serve as a safeguard to prevent extinction of the subspecies and therefore could be tapped to bolster a failing wild population. Recently published research (Frankham 2007) on the genetic fitness of captive populations points to a possible reversal of that supposition because the genetic value of the captive population decreases as more generations are bred in captivity. Captive breeding populations adapt genetically to the captive environment and these adaptations may be detrimental when populations are returned to wild environments. To ameliorate this dilemma and to bolster the program in general, the release of more wolves into the wild is essential, along with protections that allow the wild population to thrive and expand naturally.

✓ **Change the existing protected classification from “experimental, non-essential” to “experimental, essential”**

The nonessential experimental designation significantly reduces the ESA’s regulatory requirements, and is presumably used to provide management flexibility in recovery areas that are intersected by human inhabitation. Such regulations are instituted to satisfy political constraints rather than fulfill the biological requirements of the endangered species and are responsible for the frequent recaptures and re-releases of Mexican wolves which may interfere with pack formation and the establishment and maintenance of home ranges. Mexican gray wolves are not recovering under the existing classification.

RE: Mexican gray wolf scoping comments, 2007

page 4

✓ **Revise the Recovery Plan**

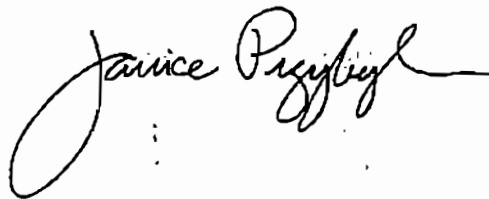
The Recovery Plan has not been amended for 25 years and does not include objectives for full recovery of Mexican gray wolves. So that rule changes do not preclude future recovery actions, the recovery plan should be revised before or concurrent with the rule change.

✓ **Keep future recovery options open**

The rule change should not include provisions that limit future options for recovery of Mexican gray wolves outside the current boundaries of the BRWRA.

In closing we would like to reiterate our strong support of recovery of the critically endangered Mexican gray wolf and we urge the USFWS to fulfill its mandate under the Endangered Species Act and adopt changes to the 10(j) rule that produces a protected Mexican gray wolf population that is not restricted by unnatural boundaries.

Respectfully submitted,



Janice Przybyl
Wildlife Linkages Program Coordinator

REFERENCES

Frankham, R. 2007. Genetic adaptation to captivity in species conservation programs. *Molecular Ecology: OnlineEarly Articles* Published article online: 2-Aug-2007 doi: 10.1111/j.1365-294X.2007.03399.x

Paquet, PC, JA Vucetich, MK Phillips, and LM Vucetich. 2001. Mexican Wolf Recovery: Three-Year Program Review and Assessment. Prepared by the IUCN Conservation Breeding Specialist Group for the US Fish and Wildlife Service, Albuquerque, NM.

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DEC 31 2007

USFWS-NMESFO

5051 N. Sabino Canyon Rd, #1197
Tucson, Arizona 85750
December 31, 2007

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

Re: Comments to the Federal Register Vol. 72, No. 151, pp. 44065-44069, August 7, 2007: Preparation of an Environmental Impact Statement regarding the recovery of the Mexican Gray Wolf in Arizona and New Mexico

Dear Mr. Millsap:

I am providing my comments with respect to the Mexican Gray Wolf recovery project and the proposed amendment to the above-mentioned rulemaking as published on August 7, 2007.

Issue (a)

Because the Mexican Gray Wolf has shown that it can successfully establish itself outside the primary and secondary recovery zones, I support allowing the wolves to establish themselves anywhere within the Mexican Wolf Experimental Population Area.

Issue (b)

To remove some of the constraints on genetic diversity and for a more successful recovery of the Mexican Gray Wolf, I strongly support the opening of the secondary recovery area for initial releases of the wolves.

Issue (c)

Consider removing the White Sands Missile Range as part of the recovery area because it has limited value to the Mexican Gray Wolf project.

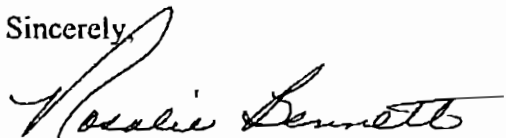
Issues (d) and (e)

Please do not change the current harassment rules. The Mexican Gray Wolf is a "proposed endangered" species under the Endangered Species Act, and the current prohibitions against take and harm should not be loosened. Increased harassment against the wolf would potentially increase danger to the wolf and reduce its numbers. Thus, at this point in time, the current harassment policy should not change.

I would urge broader educational programs to all segments of the population in order to increase the understanding of the behavior of the Mexican Gray Wolf and its place in the overall habitat. Unless the general public acquires better knowledge that will dispel myths and fear of the wolf, this recovery project cannot be successful.

In conclusion, I would ask that appropriate management actions be taken to ensure the success of the Mexican Gray Wolf recovery project, which falls under the auspices of the Endangered Species Act – still solidly supported by the American public. Thank you.

Sincerely,

A handwritten signature in cursive script that reads "Rosalie Bennett". The signature is written in black ink and is positioned below the word "Sincerely,".

Rosalie Bennett

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:

- 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.mexicanwolves.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.

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USFWS-NMESFO

Comments:

I am in support of continuing the reintroduction process for the Mexican Gray Wolf.

I believe that the current population and any future populations of Mexican Gray Wolves should be protected by law.

Name: Marianne Mara

Street: 1474 E. Adelaide Dr.

City, State, Zip: TUCSON, AZ

85719

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

DO NOT STAPLE
Thank you for your input!

January 2, 2008

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:

Thank you for the opportunity to offer scoping comments and issues on the above captioned rule.

The following issues should be included in the scope of analysis:

1. Recognize and mitigate impacts to communities and individuals affected by introduced wolves.
2. Disclose 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. (All the people howling for introduction of these animals are urban people and are unaffected on a daily basis.)
3. Full investigation into the cost to livestock operations, in time and availability of anyone to remove livestock carcasses.
4. Discontinue the practice of translocating problem wolves. This just shifts the problem from one community to another.
5. Prompt control, lethal and non-lethal, of problem wolves.
6. Improve monitoring of wolves to insure that residents of the release areas are informed when wolves are in close proximity and to facilitate documentation of predation on livestock, people and pets.
7. Amend 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 demonstrates desensitization to human encounters.
8. Amend the 10(J) rule to allow harassing or humanely dispatching of wolves by 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.
9. Amend 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.
10. The 10(J) rule should document 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.
11. Maintain the livestock production in the release and recovery area.

12. 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.

13. Analyze the alternative of discontinuing the program, including the costs and benefits of the program thus far.

There are many more concerns but addressing these are will be a good place to start. This would convey to the rural communities that Fish and Wildlife recognizes their concerns and are willing to address some of them.

Sincerely,



Patricia King
HCR 1 Box 97E
Tucson, Az 85736

How to Submit Comments

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Comments:

Thank you for the opportunity to comment.

First, I want to see an expanded number of wolves in Eastern Ariz & Western NM, so I believe that the BREA should be expanded or just eliminated, as it is an artificial limitation.

Second, the Mexican Grey Wolf is endangered, not experiments let's treat them as such.

Third, I support the idea of expanding carnivore conservation funds to help ranches with predation problems but much of the up front work needs to be done by ranches--particularly those on BLM lands--of cleaning up dead carcasses, hiring coltrix in certain protected areas and doing more herd management as opposed to just letting them "out there" and exploding when a wolf makes a kill.

Finally, I am not in favor of the recent "take" of wolves--I believe the ecosystem will be healthier when a viable population is allowed to roam in our wilds just give the wolf a chance.

Name: Michael Ingram

Street: PO 86474

City, State, Zip: Tucson AZ

85754

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

DO NOT STAPLE
Thank you for your input!

How to Submit Comments

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Comments:

It is time we took action to save this species. It is essential that we work to protect these beautiful creatures. We should expand their territory and give them more freedom of movement. Ranchers should be responsible for the removal of their livestock when their animals perish. This decrease spread of disease. We need to increase their numbers and stop the killing of these beautiful animals

Name: Melissa Stabbin
Street: 6331 N. Barcelona Court
Unit 922
City, State, Zip: Tucson, AZ
85704

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

DO NOT STAPLE
Thank you for your input!

How to Submit Comments

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You may submit written comments in three ways:

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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: It is the wilderness itself that I love, I would love to see the native wildlife of all species remain balanced and thriving the way it was before man stepped in and changed the natural balance that God our Creator intended it to be. The encroachment of man and his multitude of Cattle is what has reduced the Mexican wolf on its own land to begin with. The wolves and Cattle must now live together so we must come up with a learned behavior that will teach the wolves to teach their offspring to avoid cattle and man in a manner that will hopefully carry on for an acceptable balance between man and beast. The use of automatic stimulated sounds that are repulsive to the wolves as they approach the cattle and or a strong "SHOCK" to solidly teach the wolf to run like hellfire!

Some behaviors only have to be experienced only 1-2 times, they are never forgotten!

Like when a child burns its fingers on the stove! The child does not forget and does not even do it again! So as may be the case with wolves who have an excellent memory! I would like to help in my way I can. Thanks

Darrell Ayers

Name: Darrell Ray Ayers

Street: 1202 W. Hadley St.

City, State, Zip: TSM, AZ, 85705

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

DO NOT STAPLE
Thank you for your input!

Mr. Millsap,

I am writing to voice my support for the Mexican Gray Wolf. I hope that in the future, science will take precedence over politics in the management decisions concerning the wolf. I support relaxing the strict boundaries imposed on the recovery areas, and I also support giving the wolf full protection under the Endangered Species Act. The "experimental nonessential" designation makes no sense when there are only 60 individual wolves in the wild.

Sincerely,



Jesse Wood





USA First-Class

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NOV 18 2007 PM 4 1

Dear Administrator Millsap,
As concerned citizens & members of the
Center for Biological Diversity, Sky Island
Alliance and Defenders of Wildlife -
we strongly urge you to support the
Conservation Alternative which would
prioritize wolf recovery over livestock
grazing on public lands and rein in
the federal predator control that has
inhumanely & immorally killed, wounded
and captured so many Mexican Gray
Wolves. Very sincerely yours, Dr. & Mrs. Nesit