



## Arizona House of Representatives Phoenix, Arizona 85007

December 17, 2013

The Honorable Daniel M. Ashe, Director  
U.S. Fish and Wildlife Service  
1849 C Street, NW  
Washington, DC 20240

Dear Director Ashe,

This letter is in response to the proposed Rule revisions for delisting the gray wolf and the Mexican wolf (ID FWS-HQ-ES-2013-0073). We write in support of the portion of the proposed rule that would delist the gray wolf nationally, based on the current information that the gray wolf population in the lower 48 states is no longer in danger. However, we are strongly opposed to the portion of rule that would list the Mexican wolf as an endangered sub-species.

The Mexican wolf in Arizona is part of "Nonessential Experimental Population," which allows for "relaxed" Endangered Species Act requirements. Listing the Mexican wolf as "endangered" would negatively impact the private landowners and ranchers in the state of Arizona by imposing additional restrictions on those private lands, which is an economic and operational burden on the public. The current listing still provides for protection of the Mexican wolf population, but also creates a mechanism for landowners to protect their property and livestock from depredation.

Furthermore, we are opposed to the proposed changes to the rule regarding the expansion of the habitat of the Nonessential Experimental Population of the Mexican Wolf (ID FWS-R2-ES-2013-0056). The 1998 Final Rule that designated a Nonessential Experimental Population of Mexican wolves already provides a framework for Mexican wolf reintroduction projects in Arizona and New Mexico. The U.S. Fish and Wildlife Services (USFWS) is the lead agency in Mexican wolf recovery throughout Arizona and New Mexico. The USFWS, along with Arizona Game and Fish Department (AZGFD) and several other state and federal agencies have worked in cooperation to release captive-reared Mexican wolves in the Blue Range Wolf Recovery Area located in Arizona. During the years that the program has been in place, these wolves have demonstrated the ability to breed and survive in the wild, which is an indication of a healthy population.

In light of the current success of the recovery program and because the USFWS has not yet completed an Environmental Impact Statement (EIS), the proposed expansion of the Mexican wolf habitat is of serious concern. The current proposal was crafted before a thorough analysis

had been completed of the environmental, economic and social impacts to citizens and the natural environment. This information is critical to the development of the most effective and appropriate management strategy. It is crucial to know what impacts the proposed changes will have, not only on the continued success of the wolf population, but also on the economy and well-being of the citizens that live in the area.

It is our opinion that the state of Arizona is in the best position to manage the wildlife species within its borders. Rather than expanding the Mexican wolf recovery program and territory under the authority of the USFWS, the recovery efforts should be managed by AZGFD. The state agency is especially well suited to maintain a fair and balanced recovery program within the state of Arizona because it employs wildlife biologists who have worked in the proposed areas of wolf recovery for decades. As a result, they know the biological issues associated with the wolves as well as with the populations of other species in the area such as deer and elk. In addition, the AZGFD has been actively reaching out to the public on wildlife issues. The department has been a source of information for the public and has developed a relationship with local communities that enables it to best respond to concerns and receive input from citizens living near the Mexican wolf recovery habitat and across the state.

Arizona and the AZGFD have a proven track record of native species population management. The AZGFD has successfully participated in joint efforts with the USFWS to introduce and actively manage other species formerly listed as endangered pursuant to the ESA, such as the Apache trout and the bald eagle.

We strongly encourage that you allow the AZGFD to serve as the sole management and operational entity responsible for the Mexican wolf recovery program. At a minimum, given its unique qualifications the AZGFD should have a primary role in the co-management of the program with the USFWS.

Respectfully,



Andy Tobin  
Speaker of the House



David Gowan  
House Majority Leader



Brenda Barton  
State Representative LD-6



Bob Thorpe  
State Representative LD-6