



July 24, 2023

Acting Field Office Supervisor Liisa Niva  
U.S. Fish and Wildlife Service  
1849 C Street Northwest  
Washington, D.C. 20240

**Re: Cooperating Agency Review of Environmental Impact Statement for the Establishment of a Nonessential Experimental Population of Gray Wolf in the State of Colorado**

Dear Field Office Supervisor Niva:

The Arizona Game and Fish Department (Department) would like to thank the U.S. Fish and Wildlife Service (Service) for the opportunity to comment on this Final Environmental Impact Statement for the establishment of a Nonessential Experimental Population of gray wolf in the State of Colorado.

Under Title 17 of the Arizona Revised Statutes, the Department, by and through the Arizona Game and Fish Commission, has jurisdictional authority and public trust responsibilities to conserve and protect the State's fish and wildlife resources. In addition, the Department manages threatened and endangered species through authorities in Section 6 of the Endangered Species Act (Act) and the Department's 10(a)(1)(A) permit. It is the mission of the Department to conserve and protect Arizona's diverse fish and wildlife resources and manage for safe, compatible outdoor recreation opportunities for current and future generations. For your consideration, the Department provides the following comments based on the agency's statutory authorities, public trust responsibilities, and special expertise related to wildlife resources and wildlife-dependent recreation.

The Department supports the establishment of a statewide Nonessential Experimental Population of gray wolves in Colorado under Section 10(j) of the Act, but remains concerned about the ability to preserve the genetic integrity of the Mexican wolf (*Canis lupus baileyi*) to allow for its continued recovery and the ability to protect native ungulate populations. Nonessential Experimental Populations play a vital role in recovering endangered species, specially those that may be controversial and cause conflicts with humans. This designation would balance the needs of successful wolf reintroduction with the needs of those who live, work, and recreate on the landscape as well as those who seek Mexican wolf establishment for its intrinsic value.

The Department thanks the Service and its cooperating agencies for the much improved recognition of the importance of managing the separately listed Mexican wolf as an ecologically, genetically, and physically unique subspecies that requires careful conservation measures. Having evolved in the American Southwest and Mexico, this subspecies holds an important place in this region from both a social and biological standpoint. Therefore it is important to

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mention that the concurrent issuance of a 10(a)(1)(A) permit to eliminate the potential for genetic dilution in the Mexican wolf genome from dispersing northern wolves is critical to achieving Mexican wolf recovery.

In some sections of the document, reference is made to the reintroduction of the Mexican wolf. For accuracy, this should be modified in all instances to refer to the "recovery" of the Mexican wolf. This highlights that the Mexican wolf is being managed as dictated by the Act and not a discretionary action by the state and federal wildlife management agencies. In addition, the Department recommends changing the term "over-hunting" with "over-utilization" for the term over-hunting is often misused.

Below are page specific comments:

- Page 4-33, reference is made to the organizations that participated in the 2022 revision to the Mexican wolf recovery plan. It would be more accurate to reference that there was much broader participation than the list provided as there was representation from independent scientists and academic institutions in both the U.S. and Mexico as well. This mix of scientists was essential to the development of a revised recovery plan that represented the best available science. It also outlines and recognizes the six key elements in the 2022 Mexican Wolf Recovery Plan, Second Revision. It is important to acknowledge that the recovery plan and the Act itself emphasizes the genetic uniqueness of the Mexican wolf and the importance of protecting this genetic uniqueness into the future from both a legal and ecological standpoint.
- Page 4-34, there is note of the Service's role in law enforcement and public education/outreach. The Department recommends including recognition of the role that State Wildlife Agencies in Arizona and New Mexico contributed in these important activities.
- Page 4-37, there is a statement that indicates there will be no cumulative adverse impacts to ungulate populations in the future. This statement seems quite strong looking into an uncertain future for gray wolf reintroduction. This could be reworded to indicate that there are no anticipated adverse impacts to ungulates by wolf reintroduction. As written, this statement has implications outside of the Colorado reestablishment program.
- Page 4-44, states that dispersing wolves from Colorado may have an adverse economic impact to livestock producers. The Department believes it is important to acknowledge that a dispersing northern wolf to the Kaibab Plateau in Arizona would also pose jeopardy to the economically important North Kaibab deer herd. This is a prime concern to the Arizona Game and Fish Commission and seems to merit mention here. While many deer herds in the West have a high degree of connectivity to other source populations, the Kaibab is, in essence, a deer "island" and, as such, has special status to Arizona.

The Department wants to thank the Service for the opportunity to comment on this proposed rule. It is also important to restate that the Department supports the establishment of this 10(j) population of wolves provided there is the ability to manage ungulate impacts and wolf movements that could imperil the recovery of the Mexican wolf. If you have any questions, or desire clarification, please contact Clay Crowder, Assistant Director of Wildlife Management Division at [ccrowder@azgfd.gov](mailto:ccrowder@azgfd.gov).

Sincerely,



Clay Crowder, Assistant Director Wildlife Management Division

cc: Ty Gray, Director Arizona Game and Fish Department  
Mike Sloane, Director New Mexico Department of Game and Fish

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