



DR. BUU NYGREN **PRESIDENT**

RICHELLE MONTOYA **VICE PRESIDENT**

The Navajo Nation | Yideeskáądi Nitsáhákees

4/6/23

To: Service Information Collection Clearance Officer
US Fish and Wildlife Service
5275 Leesburg Pike, MS: PRB (JAO/3W)
Falls Church, VA 22041-3803

RE: OMB Control Number 1018-Gray Wolf
Colorado Wolf 10J rule – Docket No. FWS-R6-ES-2022-0100

To Whom It May Concern,

The Navajo Nation Department of Fish and Wildlife has received and reviewed the proposed Colorado Wolf 10J rule. Navajo Nation appreciates the opportunity to provide comments to the proposed 10J rule for wolves in Colorado. The Department wishes to share comments and concerns on behalf of the Navajo Nation with US Fish and Wildlife Service as it relates to wolves and wolf management on Navajo Tribal Trust Lands and satellite area in Colorado (e.g., Wolf Springs Ranch).

The Navajo Nation understands the importance of Endangered and Threatened species recovery efforts across North America as it relates to restoring ecological balance to a system that is out of balance in its present condition. However, Navajo Nation has strong concerns regarding wolves and wolf management on Navajo Nation lands and States adjacent to the Navajo Nation.

Gray wolves (*Canis lupus*) are listed as a G1 species under the Navajo Endangered Species List (NESL, 2020). Indicating this species has been extirpated from Navajo Nation. With the loss of this species on Navajo Nation there is now concern for wolf establishment on Navajo Tribal Trust Lands. Including negative impacts to big-game hunting opportunities, cattle/sheep herding lifeways, traditional Navajo lifestyle, and public safety. These concerns are shared with both the Mexican Gray Wolf (*C. lupus baileyi*) reintroduction area in AZ and NM and now with the proposed reintroduction of Gray Wolves in Colorado. Navajo Nation requests the State of Colorado and US Fish and Wildlife Service commit to taking meaningful steps to address, prevent, and manage any wolf that cross onto Navajo Nation lands including properties in Colorado through the following;

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1. **Government-to-Government Consultation and Coordination** – Navajo Nation wishes to see a Colorado Wolf management group developed with Colorado Parks and Wildlife, US Fish and Wildlife Service, impacted Tribes, and other groups who will receive regular updates regarding wolf reintroduction and management in Colorado.

Previously, the Navajo Nation requested for 10J rule designation for the Mexican Gray Wolf and was denied the designation. However, the state of Colorado can ask for state-wide 10J rule designation meanwhile the Navajo Nation was denied the opportunity raising inconsistencies in 10J rule making. Further the application of Colorado's Wolf Management Plans on tribes in locations such as Wolf Springs and Boyer Ranch is against tribal sovereignty. The Navajo Nation should have its own management plan for private lands in Colorado.

2. **GPS Collar Tracking Devices** – Navajo Nation wishes to have all wolves collared with GPS tracking units so as to ensure any individual that wanders onto Navajo lands is quickly located and removed.
3. **Wolf Removal from Tribal Lands** – Navajo Nation does not want wolves to establish on Navajo Lands. As such, any wolf that comes onto Navajo Nation shall be removed as quickly as is possible. Navajo Nation expects this effort to be coordinated by US Fish and Wildlife Service and/or Colorado Parks and Wildlife at no charge to the Nation.

In summary, Navajo Nation does not want wolves to establish or reside on Navajo tribal lands. The political and social concerns related to wolf management on Navajo Nation is overwhelmingly negative. While we have no specific objection to the establishment of wolves in Colorado. We do object to allowing wolves to roam, establish or wander onto Navajo Nation from the Colorado reintroduction area. Hence, our comments are intended to establish open lines of government-to-government communication to coordinate removal efforts, if, and when a wolf crosses onto Navajo Nation lands.

Sincerely,

A handwritten signature in black ink, appearing to read "G. M. Tom", written over a horizontal line.

Gloria M. Tom, Department Manager III
Department of Fish and Wildlife

A handwritten date "4/11/23" written in black ink over a horizontal line.

Date

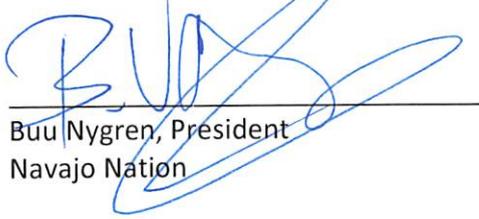


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Navajo Nation OPVP Signatures



Buu Nygren, President
Navajo Nation

APR 27 2023

Date