



June 11, 2020

Amy Lueders
Regional Director
Southwest Region
U.S. Fish and Wildlife Service
Department of the Interior
500 Gold Ave. SW
Albuquerque, New Mexico 87102

Re: “Endangered and Threatened Wildlife and Plants; Revision to the Nonessential Experimental Population of Mexican wolf (*Canis lupus baileyi*); Environmental Impact Statement.”

Dear Ms. Lueders:

The Congressional Sportsmen’s Foundation (CSF) would like to thank the U.S. Fish and Wildlife Service for the opportunity to comment on Docket No.: FWS-R2-ES-2020-0007 “*Endangered and Threatened Wildlife and Plants; Revision to the Nonessential Experimental Population of Mexican wolf (Canis lupus baileyi); Environmental Impact Statement.*”

With over three decades in the policy arena, CSF works with different levels of government to advance and protect our outdoor sporting heritage and traditions. Rooted in the Congressional Sportsmen’s Caucus, the largest, most active bipartisan caucus on Capitol Hill with nearly 250 Members of Congress, CSF has extended this legislative network from Washington, DC to states across the country, establishing the bipartisan National Assembly of Sportsmen’s Caucuses (NASC) and the Governors Sportsmen’s Caucus (GSC). Presently, NASC is comprised of 49 state legislative caucuses with over 2,500 legislators, while the GSC includes more than half the governors from throughout the country. Together, CSF and this collective force of bipartisan elected officials work to protect and advance hunting, angling, recreational shooting and trapping for the nearly 40 million sportsmen and women who spend over \$90 billion annually on outdoor pursuits.

CSF supports the designation of the Mexican wolf as an “non-essential experimental” population under section 10(j) of the Endangered Species Act. Both the Arizona Game and Fish Department (AZGFD) and the New Mexico Department of Game and Fish (NMDGF) have been extremely successful in managing Mexican wolf populations at the state level, as can be seen by the population growing from the original 11 individuals to the current 163 wild individuals, equating to a 1482% population growth since 1998. Equally impressive, under the management of AZGFD and NMDGF, the Mexican wolf population has grown every year over the past decade. Such success of the wild Mexican wolf populations would not have been possible without the purposeful and scientifically based captive breeding program.

The Mexican wolf captive breeding program is currently at maximum capacity with over 400 individuals, equating to more than a 211% population increase, the majority of which are young, healthy individuals of prime reproductive age. Due to the program’s success, 52 hand selected pups have been cross-fostered into the wild population since 2014 with the intent of increased the genetic diversity and overall fitness of the wild

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population. Of the 52 pups, 50 have been successfully integrated into the wild populations. The ability to cross-foster pups is critical to the recovery and genetic viability of the subspecies due to the fact that adult wolf introductions are rarely successful and often lead to human-wolf conflict.

In order for the Mexican wolf to be classified as “non-essential experimental population,” in the unlikely event that the entire wild population were to perish, maintaining the current captive bred population would preclude complete extinction of the species as a whole. Because of the significant population growth trends over the past decade, it is extremely unlikely that the current wild Mexican wolf populations would disappear completely from the landscape. However, in the improbable event that they did, the success of the captive breeding program has created a substantial source population of genetically diverse wolves that would be able to repopulate the subspecies on the landscape, effectively negating the need to reclassify the Mexican wolf as an “essential experimental population.”

CSF commends both the AZGFD and NMDGF on their demonstrated effective management and continued dedication in the successful recovery of the Mexican wolf and believes that continued state-based management is in the best interest of the subspecies. If the Mexican wolf was to be reclassified as “essential,” it would greatly reduce the flexibility and ability of the state agencies in managing the subspecies and its recovery. In addition to the biological requirements, the successful recovery of the Mexican wolf is also dependent upon wildlife stakeholder acceptance capacity.

With the “non-essential” classification, state agencies have the ability to remove problem wolves from wild populations (either by culling or relocation into a captive breeding facility) for repeat occurrences of livestock depredation. As it stands, only 16 Mexican wolves have been removed from the wild in the U.S. due to issues with livestock depredation since 2008, equating to only 1.2% of the total wild population. Without this flexibility, public tolerance of wolves on the landscape will drop substantially, and hostility towards the Mexican wolf will increase, potentially resulting in increased illegal take of animals. In order to mitigate illegal harvest of wolves, the AZGFD and the NMDGF have been proactive in educating hunters on how to differentiate between a coyote and Mexican wolf in addition to notifying individuals who plan to hunt in areas known to harbor wolves to be aware. Since this proactive effort began in 2018, AZGFD has seen a 40% decrease in illegal/incidental take of Mexican wolves. Once again showing the dedication and ability of state agencies to effectively manage the recovery of the Mexican wolf.

CSF appreciates the opportunity to support the state-based management of the Mexican wolf under the 10(j) framework and the continued classification of the subspecies as an “non-essential experimental population.”

Sincerely,



Ellary TuckerWilliams
Inter-Mountain Western States Coordinator

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