

Dr. Benjamin N. Tuggle  
Director, USFWS Region 2  
500 Gold Avenue, SW  
Albuquerque, New Mexico 87103

April 15, 2014

Subject: Draft EIS Alternatives Pertaining to Revision of Mexican Wolf NEP Rule

Reply to: Terry B. Johnson; ES Advisement, LLC; 6021 West Donald Drive, Glendale,  
Arizona 85310-4205

Dear Dr. Tuggle:

This letter conveys, on behalf of various Cooperating Agencies (see below), an Alternative to proposals drafted by U.S. Fish and Wildlife Service (USFWS) in conjunction with an Environmental Impact Statement (EIS) on revision of the 1998 Nonessential Experimental Population Rule (NEPR) under which Mexican wolf reintroduction is occurring in Arizona and New Mexico. Several of the Cooperating Agencies and Stakeholders signatory to this letter are among the entities that submitted extensive comments in 2013 on Draft EIS Scoping and draft revision of the NEPR. Those submittals occurred in conjunction with (respectively) Federal Dockets FWS-R2-ES-2013-0098 and FWS-HQ-ES-2013-0073 and they and all material cited or otherwise referenced therein are included by reference herein.

This submittal in no way diminishes our previously identified concerns about USFWS compliance with National Environmental Policy Act (NEPA) and Administrative Procedures Act (APA) regulations that govern development of an EIS and promulgation of an NEPR. As noted in our comments on the Federal Dockets referenced above, we believe the current USFWS approach confuses restoration and recovery with reintroduction, substitutes future (potentially suitable) range for scientifically-credible historical range and minimizes the vital importance of wolf recovery in Mexico while forcing wolves into areas of the American Southwest that are inferior in terms of habitat and inappropriate in terms of historical occupancy.

Although litigation remains a viable alternative if those issues are not resolved, we believe that it is essential for us to propose a new Alternative (see Attachment). We believe this Alternative is an important, necessary step toward achieving the Purpose and Need that drives the EIS and NEPR processes. This Alternative is based on two decades of experience with Mexican wolf reintroduction and on the best available biological and social science. It reflects our belief that wolf issues occur in real time and demand real-time decisions and solutions. It also reflects our belief that increased social tolerance is essential to moving Mexican wolf conservation forward significantly over the next decade.

Our purpose in submitting this Alternative is to describe approaches that are based in a sound understanding of the biological, social and wildlife management realities in the areas of Arizona and New Mexico that can best contribute to rangewide Mexican wolf recovery, while sustaining other legitimate uses of public and private lands. Many of these approaches have been

recommended in the past by State wildlife agencies, local governments and by the USFWS's own reviews of Mexican wolf reintroduction (i.e. 2001, 2002 and 2005). Some are new to USFWS Region 2 but for the most part they are based on approaches taken by other USFWS regions for a variety of species. All reflect the legal mandates and responsibilities that State and Tribal wildlife agencies have as stewards of the species that occur within their jurisdictions.

Our intent with this Alternative is to reframe the EIS discussion to talk about possibilities as well as realities. We intend to use open, informed discussion in Cooperator meetings to identify which aspects of this Alternative and others can be blended into a Preferred Alternative that best meets Federal, State, Tribal and stakeholder needs. We want to see those needs defined in terms of furthering Mexican wolf conservation while also minimizing and offsetting negative impacts on the humans who share with wolves the fragmented landscape, limited natural resources and economic and recreation challenges inherent to the American Southwest.

We have spent months developing this Alternative. It is imperfect and not all of us agree with every aspect. However, we all agree that it would lead to a stronger foundation on which to build a Mexican wolf conservation program. Thus, as Cooperating Agencies, we expect the USFWS to give this Alternative full consideration, a rigorous but fair and open-minded staff and public evaluation and ample time for discussion with Cooperating Agencies and the public. In short, we expect to use this Alternative and that collaborative discussion to ensure that the time and effort we invest in the EIS process will be fruitful.

We anticipate beginning this dialogue at the April 15, 2014 EIS Cooperators meeting and we respectfully ask that you be present for that discussion.

Sincerely,

Cooperating Agencies

Arizona Game and Fish Department  
Eastern Arizona Counties Organization  
Gila County (AZ)  
Graham County (AZ)  
Greenlee County (AZ)  
Navajo County (AZ)

Stakeholders Supporting this Alternative as a Starting Point for Further Discussion

Anglers United  
Arizona Antelope Foundation  
Arizona BASS  
Arizona Big Game Super Raffle  
Arizona Cattle Growers' Association  
Arizona Chapter of the National Wild Turkey Federation  
Arizona Deer Association  
Arizona Desert Bighorn Sheep Society  
Arizona Elk Society  
Arizona Houndsmen

Arizona Sportsmen for Wildlife Conservation  
Arizona Trappers Association  
Arizona Wildlife Federation  
Big Game Forever  
ES Advisement, LLC (AZ)  
Coconino Sportsmen  
Outdoor Experience 4 All  
Phoenix Varmint Callers, Inc.  
Sportsmen's Constituent Group  
The BASS Federation  
The Mule Deer Foundation  
1-2-3-Go

cc: Larry D. Voyles, Director, Arizona Game and Fish Department  
R.J. Kirkpatrick, Acting Director, New Mexico Department of Game and Fish  
Kay Gale, County Manager, Greenlee County, Arizona  
Pascal Berlioux, Executive Director, Eastern Arizona Counties Organization  
Dan M. Ashe, Director, U.S. Fish and Wildlife Service  
Rowan W. Gould, Deputy Director of Operations, U.S. Fish and Wildlife Service  
Jonathan J. Olson, Region 2 NEPA Coordinator, U.S. Fish and Wildlife Service  
Steven L. Spangle, Arizona Field Office Supervisor, U.S. Fish and Wildlife Service