



WILDERNESS WATCH

Keeping Wilderness Wild

January 27, 2022

Board of Directors

Louise Lasley, NM
President

Mark Peterson, WI
Vice President

Gary Macfarlane, ID
Secretary

René Voss, CA
Treasurer

Talasi Brooks, ID

Mark Pearson, CO

Cyndi Tuell, AZ

Howie Wolke, MT

Executive Director
George Nickas

Minnesota Office
2833 43rd Ave. South
Minneapolis, MN
55406

Idaho Office
P.O. Box 9765
Moscow, ID 83843

Public Comments Processing
Attn: FWS -R2-ES-2021-0103
U.S. Fish and Wildlife Service
MS: PRB/3W
5275 Leesburg Pike
Falls Church, VA 22041-3803
Sent via the electronic portal

RE: Comments on Mexican Gray Wolves Supplemental EIS--sent via the portal

These are comments submitted by Wilderness Watch on the draft EIS for recovery of the Mexican gray wolf. Wilderness Watch is a national nonprofit wilderness conservation organization dedicated to the protection and proper administration of the National Wilderness Preservation System. Our comments focus on the importance of Wilderness for wolves.

Wolves are an integral part of the Wilderness in the US Southwest. The Gila, Blue Range, Aldo Leopold, Bear Wallow, Escudilla, Mt Baldy, Apache Kid, and Withington Wildernesses and the Blue Range Primitive Area form an important core for this rare subspecies of wolves. Wilderness Watch strongly supports wolf recovery in places with adequate secure habitat. The Mogollon Rim and a broader expanse in New Mexico and Arizona country seem to be such a place, with a large portion of Wilderness.

Wolves in Wilderness should not be trammled, but rather allowed to play their ecological roles without constant prodding and probing by managers. Wilderness should be a refuge for wolf populations. Extensive helicopter / motorized use, radio telemetry collaring and monitoring, and ongoing wildlife population manipulation, are inconsistent with the Wilderness Act and arguably not in the best interest of the wolves.

In order to reduce stress to wolves and lead to recovery we have some suggestions that should be adopted.

- The US FWS should require the Forest Service and BLM to close vacant grazing allotments in wolf habitat, especially in Wilderness. Voluntary grazing permit retirement should be pursued. These measures would help reduce conflicts with cattle and sheep. This should be pursued across a wider expanse rather than just the current range of the wolves.
- Full protection under the Endangered Species Act as an essential population should be adopted rather than an experimental nonessential designation under 10j.
- The current population cap of 325 wolves must be removed as it is too low for long-

term persistence. Further, the proposed management goal of an average of 320 wolves is insufficient as well. Expanding the recovery area further west, including western Arizona would help promote long-term recovery.

- Barriers, including social and political ones, to wolf movement should be removed. In particular, wolves should be allowed north of I-40.

Current management practices have proven to be insufficient and legally deficient. Wilderness, should be a refuge for wolves, including from heavy-handed manipulations of managers. Wilderness only plays this crucial role in the eventual recovery of the species if it remains in contrast to areas dominated by humans.

Sincerely,

A handwritten signature in black ink, appearing to read "Gary Macfarlane". The signature is fluid and cursive, with the first name "Gary" and last name "Macfarlane" clearly distinguishable.

Gary Macfarlane
Board Member