



New Mexico Cattle Growers' Association

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Public Comments Processing,
Attn: Docket No. FWS-R2-ES-2022-0018;
U.S. Fish and Wildlife Service Headquarters, MS: PRB/3W;
5275 Leesburg Pike
Falls Church, VA 22041-3803.

Re: Fish and Wildlife Service [Docket No. FWS-R2-ES-2022-0018; FXES111302WOLF0-223-FF02ENWF00] Endangered and Threatened Wildlife and Plants; Draft Recovery Plan for the Mexican Wolf, Second Revision

Dear Sir or Madam:

The New Mexico Cattle Growers' Association has reviewed the United States Fish & Wildlife Service's ("Service") Draft Mexican Wolf Recovery Plan, Second Revision, dated January 2022, actually released in April 2022. The New Mexico Cattle Growers' Association represents cattle growers in 32 of New Mexico's 33 counties and in 19 other states. On their behalf, the New Mexico Cattle Growers' Association offers the following specific comments on "Recovery Actions Added to the Implementation Schedule to Address Human-Caused Mortality":

Page 30: "*Section 1.1.1 Document U.S. wolf population parameters*"

The Service should expressly identify how it plans to document wolf population, particularly the presence of uncollared wolves.

Page 31: "*Section 1.6.1 Conduct education and outreach in local communities within occupied Mexican wolf range*"

1. The FWS budget to recover the Mexican wolf is \$2.7MM per year. FWS claims this budget has been stagnant for many years. FWS advises that its level of "customer service" will decrease as wolf numbers further increase. This points to more conflict with livestock. Education will not materially help the ranching community. Ranchers have been dealing with wolf depredations for two decades. Ranchers have attended community educational meetings for years; more of the same is not going to improve attitudes about a recovery program has been shoved down ranchers' throats. There is no evidence we are aware of or that the Service cites to that illegal kills are made by members of the ranching community. More likely, the illegal kills are by those temporarily present in wolf country who possess anonymity that ranchers do not have. Even so, the probability that an LEO will be present when a wolf is killed in the vast areas of wolf country is remote and, despite the plan, there is no evidence that FWS has the resources to pay for LEOs.

2. The alternative, better way to address wolf/livestock conflict in a recovery plan has two components:
 - a. Work with ranchers to facilitate managing their livestock on a day-to-day basis particularly with the prospect of increasing numbers of wolves. That means providing ranchers, for example, with the technology to identify wolf presence and movement on their ranches in real time. That does not mean cumbersome receivers that a rancher is supposed to scroll through to see if a particular collared wolf happens to be within the range of the receiver. It does mean a software application that identifies presence and movement in real time on their ranch and within a day's movement of that ranch.
 - b. Promote *environmental justice* for the ranching community. Specifically, pay ranchers for the damages they incur because of wolf depredations and wolf presence so they do not bear a disproportionate share of the cost of the program.
 - i. Pay for any probable (not just confirmed) kills.
 - ii. Pay for depredations that are not found—for each probable or confirmed wolf depredation, pay the rancher for it and for 4.6 other depredations.
 - iii. Pay ranchers for the cost of wolf presence (decreased conception rates, decreased number of weaned calves, decreased waning weights, and increased cost of management to avoid wolves—labor, pasture, hay, freight).

Page 31: “Install enhancements to facilitate Mexican wolf movement across existing and new roads and reduce vehicle collisions”

This is a pipedream. The Service has no such authority or funds.

Page 32: “Implement livestock conflict avoidance measures in hotspots of depredation activity to reduce depredation-related wolf removals.”

This statement may be misleading. The Service should identify how many depredation-related wolf removals it has actually conducted, what it did with the wolf and whether the wolf was released again. Please see response to section 1.6.1 above, which is incorporated herein. Note that the listed measures have costs that are imposed on ranchers who are not compensated for them. The Service does not say that it will pay for these measures. This simply exacerbates the *environmental injustice* of the Mexican wolf recovery program.

Sincerely,



Loren Patterson, President