



Dear President Trump  
Dear USDA Secretary Rollins  
Dear USDI Secretary Burgum  
Dear USDI Associate Deputy Secretary Budd Falen  
Dear U.S. Senator Kelly  
Dear U.S. Senator Gallego  
Dear U.S. Representative Crane  
Dear U.S. Representative Biggs  
Dear U.S. Representative Ciscomani  
Dear U.S. Representative Gosar  
Dear USFWS Acting Southwest Regional Director Jacks  
Dear USDA APHIS Wildlife Services Western Region Director Wendy Anderson  
Dear AZGFD Commissioner Hernandez  
Dear AZGFD Commissioner Sue  
Dear AZGFD Commissioner Buchanan  
Dear AZGFD Commissioner Goughnour  
Dear AZGFD Commissioner Kerr  
Dear AZGFD Director Finley

May 22, 2025

Re. Strategy for the Mexican Wolf: seven proposed actions.

We, elected Supervisors of Apache, Cochise, Gila, Graham, Greenlee, Navajo counties, representing 40% of the Arizona counties, and forming the unanimous Board of the Eastern Arizona Counties Organization, and our constituents, are being confronted with a swiftly expanding crisis regarding the Mexican Wolf recovery in Arizona and New Mexico.

The United States Mexican Wolf population is expanding at an exponential rate; it is dispersing away from the prey-rich original White Mountain reintroduction area into the prey-poor Sonoran Desert; depredations are increasing rapidly, especially in Southeastern Arizona; federal compensations funding is insufficient to address the full negative impacts of the program on rural ranchers and producers; and illegal killings are rising sharply, threatening the rule of law in our counties, creating legal and financial jeopardy, potentially compromising reaching the downlisting criteria Option 1, and potentially leading to continued and possibly successful litigation in appeal of the revised Recovery Plan and 10(j) Rule toward reducing existing takes and management actions - the impact of human-caused mortality having already been one of the rationales stated by the courts behind the previous remand of the initial revised Recovery Plan.

In a regulatory framework where local governments are devoid of decision-making authority as regards the implementation of the Endangered Species Act, we, elected Supervisors of the rural Arizona Counties that bear the brunt of the Mexican Wolf recovery impacts, are turning to you, State

and Federal leaders, to ask for your help in resolving what is quickly becoming an out-of-control situation.

We believe that per the data presented in the attached *Strategy for the Mexican Wolf*, the recovery of the Non-Essential Experimental Population of Mexican Wolf in the United States will meet the downlisting criteria (abundance and genetic diversity incorporation), Option 1, by the end of 2028, and we have identified seven potential actions that we are proposing for your consideration.

Proposed Action #1 - Considering the fact that it took three years to complete the latest revision of the existing 10(j) Rule, Proposed Action #1 is the rapid creation of a Work Group under the leadership of the Arizona Game & Fish Department and the New Mexico Department of Game & Fish, with the support of the U.S. Fish & Wildlife Service, to develop a 4(d) Rule to be implemented in 2029 after a petition by the two departments for downlisting in compliance with the provisions of the Mexican Wolf Recovery Plan, Second Revision (2022), when responsibility for the program can be transferred from federal to state agencies.

In the mean-time, as the United States population of Mexican Wolf continues to grow at an average annual rate of 14.3% since 2017, and has already reached a minimum number of 286 as of the 2024 end-of-year count, it continues to expand its geographical footprint within the Mexican Wolf Experimental Population Area (MWEPA) in Arizona and New Mexico, and depredations and negative economic impacts continue to increase in an ever larger area.

Proposed Action #2 - Considering the fact that currently the two USDA APHIS Wildlife Services depredation investigators are located in the Springerville area (Northern Arizona), Proposed Action #2 is the hiring and location in the Willcox area (Southern Arizona) of an additional USDA APHIS Wildlife Services depredation investigator, in order to provide timely investigations to Southern Arizona ranchers.

Under the implementation of the Endangered Species Act (ESA), “whatever the cost” (Tennessee Valley Auth. v. Hill | 437 U.S. 153 - 1978), by the time a downlisting occurs (2029), Arizona and New Mexico local ranchers and producers, and their rural communities, will have been bearing the brunt of the negative economic impacts of the Mexican Wolf Recovery Program for 30 years since 1998. Assuming that the implementation of ESA represents the will of the 340 million people United States nation, and considering that in our estimation less than 30,000 people in rural Arizona and New Mexico bear the negative economic impacts of the program, it is deeply unjust that 0.009% of the nation remain solely saddled with the negative economic impacts of a national program.

Federal compensations (Livestock Demonstration Grants) have typically provided approximately \$200,000 per year to Arizona to compensate ranchers and producers for confirmed depredations. While this was better than nothing, this only addressed depredations from a small wolf population in a limited area, and never compensated the full negative economic impacts of the program.

Proposed Action #3 – As the United States Mexican Wolf population is expanding exponentially, Proposed Action #3 is the augmentation of the annual federal compensation to the Arizona ranchers and producers to \$2 million per year, and, subsequent to the USDA APHIS Wildlife Services Western Region’s decision to change the Standards of Evidence for depredation confirmation, Proposed Action #3 includes the authorization to use federal

funds for the compensation of “probable” depredations, as classified in the APHIS depredation investigation reports.

Proposed Action #4 – Further, under the leadership of the Arizona Livestock Loss Board, Proposed Action #4 is the expansion of the compensation mechanisms beyond the reactive concept of ‘paying for dead cows’ toward the proactive concept of ‘paying for live wolfs’, including compensation for all depredations, “confirmed” and “probable”, increased compensation for conflict avoidance measures, and compensation for all the negative economic impacts of wolf presence.

Proposed Action #5 – In addition, under the management of the USDA Farm Service Agency, Proposed Action #5 is the increase of the Livestock Indemnity Program (LIP) compensation rate from 75% to 100% of the fair market value of livestock.

In order to meet unquestionably and timely the criteria for legally compliant downlisting, Option 1, under the provisions of the Mexican Wolf Recovery Plan, Second Revision (2022), costly program activities and management actions will continue to be needed in 2025, 2026, 2027 and 2028.

Proposed Action #6 – Considering the impossibility for a defunded Mexican Wolf recovery program to ever reach any outcome other than perpetual protection under Section 9 of the Endangered Species Act, without the tools to manage it, Proposed Action #6 is the continuation of full federal funding for all program activities necessary for progress toward meeting the downlisting criteria, Option 1, by the end of 2028. Such activities include but are not limited to annual cross-fostering; annual aerial counts; appropriate GPS collaring; appropriate translocations of individual wolf or entire packs; etc.

In parallel, as currently demonstrated in Southeastern Arizona (Cochise County) the expansion of the United States Mexican Wolf population from the core reintroduction area of the White Mountains, rich in wild ungulate preys, to the Sonoran Desert, characterized by a paucity of natural preys, is triggering dramatically increased local depredation on ranchers’ and producers’ livestock.

Proposed Action #7 – Considering the urgent need to address decisively the situation in Southeast Arizona, Proposed Action #7 is the timely and vigorous implementation, immediately and in the future, by the U.S. Fish & Wildlife Service, which retains sole decision-making authority under federal law for recovery program decisions and management actions, of all management actions allowed under the existing 10(j) Rule of the Mexican Wolf Recovery Plan, Second Revision (2022), including translocation of entire packs, possibly to Mexico at Mexican Authorities’ request in order to support recovery in Mexico, and lethal removal by federal agencies in the United States, of individual wolf proven to be highly predatory.

As a result of the hard work of the U.S. Fish & Wildlife Service, USDA APHIS Wildlife Services, Arizona Game & Fish Department, New Mexico Department of Game & Fish, Tribes, local governments, ranchers, producers, and stakeholders, the recovery of the United States Mexican Wolf population has been rapid and decisive, but costly to the rural ranching communities of Arizona and New Mexico.

It is imperative to maintain the delicate balance of bearability of the negative impacts of the program and to work toward a ‘light at the end of the tunnel’ to avoid desperate reactions, such as illegal killings, that can only result in postponing meeting the criteria for downlisting, putting folks at

substantial legal and financial risks, incentivizing fierce litigation of an upcoming 4(d) Rule, and generally leading to further confrontation.

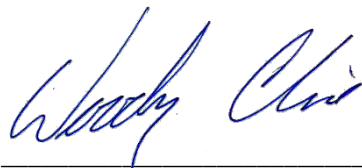
On behalf and in defense of these communities, we are urging you to give due consideration to the above seven proposed actions, in order to insure sustainable downlisting in 2029 and socially, economically, and biologically viable long-term cohabitation, now and in the future, between Mexican Wolf and human communities in the working landscapes of Arizona and New Mexico.

As a member of the Executive Team and the Management Team of the Mexican Wolf Recovery Program, we, the Eastern Arizona Counties Organization, representing Arizona local governments and rural communities in these processes, are committed to continue working cooperatively to develop solutions that can support reaching a socially viable compromise for all constituents involved in the Mexican Wolf recovery, but we need, and we ask for, your help for reasonable and necessary actions to be taken that are beyond our decision-making authority under the Endangered Species Act.

Sincerely,



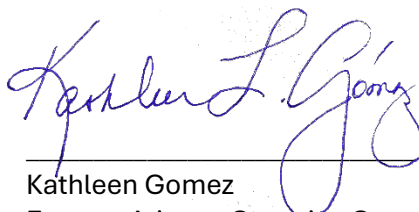
Jason Whiting  
Eastern Arizona Counties Organization Chair  
Navajo County Supervisor



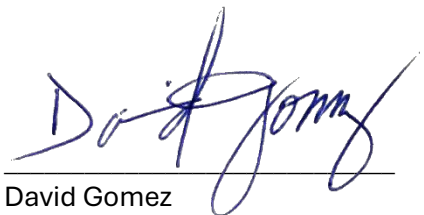
Woody Cline  
Eastern Arizona Counties Organization Vice-Chair  
Gila County Supervisor



Paul David  
Eastern Arizona Counties Organization Director  
Graham County Supervisor



Kathleen Gomez  
Eastern Arizona Counties Organization Director  
Cochise County Supervisor



David Gomez  
Eastern Arizona Counties Organization Director  
Greenlee County Supervisor



Nelson Davis  
Eastern Arizona Counties Organization Director  
Apache County Supervisor