



Pima Natural Resource Conservation District  
NRCS Plant Materials Center  
3241 N. Romero Road  
Tucson, AZ 85705

### Pima NRCD Policy 2014.09-Mexican wolf 10(j) rule

Whenever a federal agency prepares a draft Environmental Impact Statement (DEIS) that may impact the people and natural resources within the District, it is the policy of the District to review the DEIS to determine the impact on the District and respond to the agency.

The proposed Mexican Wolf DEIS for the proposed 10(j) rule is incomplete and as a result it is impossible to fully evaluate the impact that it will have on the District. For example, no consideration was made of the prey base within the District in the DEIS. The DEIS contains insufficient information to assess probable impacts on species of concern, threatened and endangered species presently residing within the District, and impacts on other natural resources within the District.

A key missing element of the DEIS is the failure to identify the impacts at varying numbers of wolves. There should be an evaluation at zero, 100, 300, 500, and as many wolves as suitable habitat and the local prey base can support. No estimation is made in the DEIS how many wolves can be supported. There is also no indication of where the Service plans to release or translocate wolves within the District.

Another failing is insufficient variety of alternatives considered. The cessation of the program and removal of wolves ought to have been considered since the wolves are "nonessential." Another alternative that ought to have been considered was presented to the Service by the highest authority in Arizona on wildlife, that being the Arizona Game and Fish Department. The Service ignored the alternative presented. While the District has no position on the merits of the Alternative, it nevertheless ought to have been considered, because of the recognized expertise of its source.

The District therefore does not recognize the DEIS as complete. The District recommends the Service withdraw the DEIS and complete it or issue a supplemental DEIS.

Approved by the Pima NRCD Board of Supervisors 9-23-2014

3 AYES

0 Noes

2 Absent

A handwritten signature in black ink, appearing to read "Cindy Coping".

Cindy Coping, Chairman