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September 2, 2014

The Honorable Daniel Ashe
Director
U.S. Fish and Wildlife Service
Department of the Interior
1849 C Street, NW, Room 3359
Washington, D.C. 20240
dan_ashe@fws.gov

Re: Gila County request for additional public information meetings and public hearings, and for an extension of the public comment period for the U.S. Fish and Wildlife Service's Proposed Revision of the Nonessential Experimental Population of the Mexican Wolf published in the Federal Register on July 25, 2014 (79 Fed. Reg. 43358) and the Draft Environmental Impact Statement for the Proposed Revision to the Nonessential Experimental Population of the Mexican Wolf (*Canis Lupus Baileyi*) dated July 14, 2014.

Dear Director Ashe:

Gila County has been a stakeholder in the efforts to develop and implement landscape scale forested ecosystems restoration; watersheds restoration; endangered and threatened fauna and flora protection; and, natural resources management for the last two decades. Gila County is actively involved as stakeholder, cooperating agency and coordinating local government in federal and state projects such as, among others, the nation's largest forested ecosystems restoration effort: the Four Forest Restoration Initiative; the ground breaking Arizona Watersheds Investment Fund; the Mexican Wolf Recovery Program; and, numerous state or local scale natural resources management projects and natural resources-based economic development initiatives.

Gila County is uniquely affected by the Proposed Revision of the 10(j) rule establishing the Mexican wolf in Arizona-New Mexico as a nonessential experimental population due to the fact that a large part of the proposed Zones 1, 2 and 3 of the proposed expansion of the Mexican Wolf Experimental Population Area (MWEPA) would be located within the county.

The U.S. Fish and Wildlife Service's publication of the Proposed Revision of the Nonessential Experimental Population of the Mexican Wolf and the Draft Environmental Impact Statement for the Proposed Revision to the Nonessential Experimental Population of the Mexican Wolf (Canis Lupus Baileyi) opened a 60-day public comment period to solicit comments on three separate items:

- 1) the proposed rule for the nonessential experimental Mexican wolf population;
- 2) the associated draft environmental impact statement; and
- 3) "the amended required determinations" contained in the proposed rule revisions.

The massive expansion of the Mexican Wolf Experimental Population Area (MWEPA) extends the Mexican Wolf Recovery Program impact to a large number of communities that have never had to deal with the Mexican wolf issue before. Further, the different management rules for Zones 1, 2 and 3 requires a triple layer of analysis for counties that include portions of all three zones. Finally, the volume and complexity of the documentation is staggering: 467 pages of draft EIS, 800 footnotes, and literally thousands of pages of literature referenced.

Yet, the Service only conducted one information meeting and public hearing, on August 11, 2014, for the entire state of Arizona, making it impractical for the majority of the communities impacted by the proposed expansion of the Mexican Wolf Experimental Population Area (MWEPA) to two thirds of the State, to be represented.

The sheer size of the documents, the geographic scope, the complexity of the proposed action, and the paucity of the public information opportunities make it essentially impossible for many Arizona communities to complete in 60 days the thorough review that this issue deserves.

Gila County, therefore, respectfully requests that the Service extend the public comment period by a minimum of 45 days, and conduct additional public informational meetings and public hearings in all affected communities throughout Arizona.

If the Service believes that these additional public meetings and this extension of the comment period may impact its ability to satisfy the consent decree, we believe that good cause exists for the Service to file for an extension of its compliance deadline.

Thank you for your consideration.
Respectfully submitted,

Michael Pastor
Chairman
Gila County Board of Supervisors

Date

ATTEST

Marian Sheppard
Clerk of the Board
Gila County Board of Supervisors

Date

Cc:

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