



Arizona Wildlife Federation

**PO Box 51510,
Mesa, AZ 85208**

**Kofa National Wildlife Refuge
9300 E. 28th Street
Yuma, AZ 85365**

**Re: DRAFT Environmental Assessment for Limiting Mountain Lion Predation
on Desert Bighorn Sheep on the Kofa National Wildlife Refuge**

The Arizona Wildlife Federation (AWF) supports approval and implementation of *Alternative B: the Proposed Action Alternative – Conduct Limited Removal of Mountain Lions*. We at the AWF commend the U.S. Fish and Wildlife Service (USFWS) and cooperating agencies, U.S. Bureau of Land Management, U.S. Department of Agriculture – Animal and Plant Health Inspection Service – Wildlife Services, and the Arizona Game and Fish Department (AGFD) on a thorough and science-based analysis of the need, actions, alternatives and expected outcomes for desert bighorn sheep management on Kofa National Wildlife Refuge.

There are several elements we wish to specifically emphasize:

- ❖ AWF supports the continued close collaboration with AGFD as they perform their wildlife management mission on the refuge and beyond. The agency has the statewide authorities for managing bighorn sheep and mountain lion – USFWS acknowledgment and cooperation is a model for other federal and state shared natural resource management actions.
- ❖ AWF supports the use of collaring and radio tracking lions, sheep and other wildlife in any manner needed to enhance the success of the proposed action alternative. This includes using the data to locate and remove (*i.e.* kill) offending lions.
- ❖ AWF supports the use of lethal methods to remove lions as long as criteria of need, personal safety and humane methods are met.
- ❖ AWF supports the consideration within wilderness areas to employ least tool and minimum requirement analysis in undertaking the proposed action alternative. However, wilderness designation should not be allowed to take precedence over the need and implementation of the alternative, once adopted.
- ❖ As stated in prior correspondence, AWF approves and supports the development and maintenance of wildlife water catchments which are needed to maintain and enhance wildlife habitat. It is critical that wildlife needs on the refuge outweigh all others, including wilderness designation limitations. These were never intended to be exclusive of one another; wildlife waters can be accomplished in a manner that does not adversely impact wilderness.

- ❖ The draft EA alludes to public outreach and involvement. This is one area that USFWS and its cooperators could become leaders in harnessing the impressive interest the issue has generated into positive long term public engagement. The websites, news releases and public meetings are commendable. However, the real gain would be to maintain the momentum by engaging all representative interests into advisory groups, citizen science projects and similar ventures. AWF and likely many similar organizations would be ready to support you in such an endeavor.
- ❖ Although not addressed in the draft EA, the impact of lion predation should prompt USFWS to delay implementation of Sonoran Pronghorn Antelope introduction at KNWR until either the lion threat has been neutralized or management actions can be planned and executed guaranteeing protection for the herd.

Thank you for the service you perform for the citizens of the United States and for America's natural resources. We appreciate the opportunity to comment and wish you the best in fulfilling the needed actions addressed in the draft EA.

Sincerely,

A handwritten signature in cursive script that reads "Ryna P. Rock". The signature is written in dark ink and is positioned above the typed name.

Ryna Rock, President
Brad Powell, Vice President of Conservation
Valerie Morrill, Region 4 Director