



Graham County Board of Supervisors

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Clay M Mack, Chairman
Paul R. David, Vice-Chairman
John Howard, Member

Dustin Welker, County Manager/Clerk

Representative Paul A. Gosar, D.D.S. – 9th Congressional District
2057 Rayburn HOB
Washington, DC AZ 20515

August 31, 2025

Re: H.R. 4255 Enhancing Safety For Animals (ESA) Act

Dear Representative Gosar:

Thank you for your service to and support of the residents, ranchers, support businesses and outdoor enthusiasts in Graham County. I am a 3rd term county supervisor and a board member of the Eastern Counties Organization of Arizona and Coalition Of AZ/NM Counties, both which are conservative groups concerned with the negative financial impacts of Mexican Gray Wolf (MGW) introduction on our ranchers, hunting guides and rural residents.

Attached below is Resolution 2025-07 passed in June by the Graham County's Board Of Supervisors opposing the unrestricted increase of the MGW population and calling for delisting of the MGW, fair compensation to ranchers for losses and presence of the wolf as well as transferring MGW management in Arizona to the Arizona Game and Fish Department.

The text of H.R. 4255 includes a majority of our Board Of Supervisor's concerns regarding the MGW's presence and impacts in Arizona. I am pleased to endorse your efforts and support H.R. 4255 in its current form.

Continued success and regards!

A handwritten signature in blue ink, appearing to read "Paul R. David".

Paul R. David, Dist. 1 Supervisor
pdavid@graham.az.gov
928-651-6506

Attach: Graham County Resolution 2025-07

Cc: Dustin Welker, Graham County Manager
Howard Hutchinson, Coalition Of AZ/NM Counties - Exec. Director
Pascal Berlioux, Eastern Arizona Counties Organization – Exec. Director



RESOLUTION #2025-07
GRAHAM COUNTY BOARD OF SUPERVISORS
REQUESTING THE DELISTING AND TRANSFER OF MANAGEMENT
OF THE MEXICAN WOLF

WHEREAS, the U.S. Fish and Wildlife Service (USFWS) began the Mexican Wolf Reintroduction Project (MWRP) in 1998 under Section 10(j) of the Endangered Species Act (ESA), designating all introduced wolves as “nonessential experimental”; and

WHEREAS, the original population goal of 100 wolves in the U.S. was met in 2014, yet the species remains listed, prolonging regulatory uncertainty and operational challenges for rural communities; and

WHEREAS, in 2015, the USFWS expanded the Mexican Wolf Nonessential Experimental Population Area to include all lands in Arizona and New Mexico south of I-40, affecting large areas of public and private grazing land critical to the regional economy; and

WHEREAS, the current population threshold for delisting—an average of 320 wolves over eight years—exceeds historical natural carrying capacity and imposes disproportionate burdens on ranching operations; and

WHEREAS, Mexican Wolf reintroduction is a joint project between Mexico and the U.S., and now due to the efforts in Mexico failing, disproportional costs and losses are now borne by Arizona and New Mexico citizens along with U.S. taxpayers; and

WHEREAS, incidents of wolf depredation on livestock have increased, with significant economic losses to ranchers, limited eligibility for compensation, and constraints on defensive actions, particularly on federal lands; and

WHEREAS, real-time tracking data for wolf locations is available to federal agencies but not to impacted landowners, limiting proactive livestock protection; and

WHEREAS, current standards for confirming wolf depredation are restrictive and inconsistent with practices in other states, limiting access to compensation; and

WHEREAS, compensation programs generally exclude indirect losses such as decreased weight gain, veterinary expenses, herd disruptions, reduced reproductivity rates, and reduction in ranch values, placing a disproportionate financial burden on local producers; and

WHEREAS, there is no compensation for lost revenue to the hospitality industry, retail stores, hunting guides, and outfitters from the reduction in hunting activity due to the shrinking elk herds in Mexican Wolf habitat; and

WHEREAS, over \$220 million has been spent on the MWRP to date, with future projections of up to \$59 million more by 2030, despite most of the species' historical range lying in Mexico; and

WHEREAS, the Arizona Game and Fish Department has the capacity to manage the Mexican wolf population effectively and responsibly at the state level; and

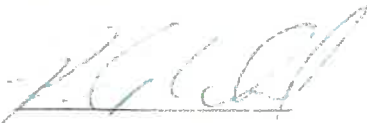
WHEREAS, the ESA's intent is to recover species to the point where federal protection is no longer required, and the Mexican wolf population in the U.S. now exceeds the thresholds of viability and sustainability;

NOW, THEREFORE, BE IT RESOLVED by the Graham County Board of Supervisors that:

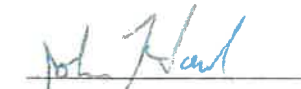
1. The Mexican wolf should be removed from the Endangered Species List.
2. Management authority for the Mexican wolf should be transferred to state and local agencies.
3. Ranchers should be authorized to protect livestock on both private and federally leased lands.
4. Real-time location data of wolves should be shared with affected land and lease holders.
5. Standards for confirming livestock depredation should be revised to reflect practical and consistent criteria.
6. Ranchers should receive full compensation for direct and indirect losses (as well as presence impacts) related to wolf depredation.
7. Continued federal funding for wolf recovery in areas where population goals have been exceeded is not justified.

ADOPTED this 30th day of June, 2025.

SIGNED:



Paul R. David
Supervisor, District 1



John Howard
Supervisor, District 2



Clay Mack
Supervisor, District 3