



Arizona Wildlife Federation  
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## **Arizona Wildlife Federation Position Statement on the August 20, 2012 USFWS Proposal for Designation of Critical Jaguar Habitat in Arizona**

The Arizona Wildlife Federation (AWF), a 501(c) 3 non-profit corporation was founded in 1923 to take politics out of Arizona's Game and Fish Management and to promote the management of Arizona's wildlife and natural resources based on the principles of 'sound science'. The AWF got its start as the Arizona Game Protection Association and will celebrate 90 years of Arizona conservation activity in 2013.

The AWF has been following the USFWS Endangered and Threatened Wildlife and plants; Designation of Critical Habitat for Jaguar process and draft proposal (77 FR 161; August 20, 2012). This latest analysis caused by a 2007 lawsuit filed by the Center for Biological Diversity and the March 30, 2009 court order telling the USFWS to conduct a critical habitat study in the states of Arizona and New Mexico.

### **Position**

The AWF concurs with the two previous decisions by USFWS in 1997 and 2006 that designation of critical habitat for the jaguar would not be prudent (62 FR 39147, July 22, 1997 and 71 FR 39335; July 12, 2006). We considered the biological justification presented then to be logical and based on 'sound science' and law. As such, we were disappointed that the USFWS chose not to reinforce those arguments when the court order was issued on March 30, 2009.

We also concur with the recent statement by Arizona Game and Fish Department that "the habitat occupied by jaguars in Arizona-New Mexico does not meet the definition of critical habitat as described by the Endangered Species Act (ESA) and should therefore not be designated. Under the ESA, critical habitat can only be designated for the U.S. However, this represents less than 1% of the entire (range-wide) habitat of the species. As is acknowledged in the notice, recovery of jaguar is entirely reliant on conservation action in the 99+% of its habitat found south of the international border. The less than 1% of potential jaguar habitat in the U.S. does not and cannot contribute substantially to recovery of the species".

In conclusion the AWF does not support designating critical jaguar habitat in Arizona based on current information.