



COUNTY OF SISKIYOU

Board of Supervisors

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CALIFORNIA
FISH AND GAME
COMMISSION
2014 AUG 13 AM 8:27

August 5, 2014

Michael Sutton
President
California Fish and Game Commission
1416 Ninth Street, Suite 1320
Sacramento, CA 95814

RE: Opposition to Listing of the Gray Wolf as an Endangered Species

Dear President Sutton:

In letters dated September 12, 2012, and May 29, 2014 (attached), the Siskiyou County Board of Supervisors urged the California Fish and Game Commission to determine that listing of the gray wolf is not warranted and that it should not be listed under the California Endangered Species Act. We are dismayed by the Commission's June decision to go ahead and list the gray wolf and the irregular manner in which that decision was made.

The Commission's action to approve listing the wolf without having findings before it for due consideration belies the politics and emotions upon which this decision is based. Instead, a decision such as this should have been grounded in science and facts, as was the case with the contrary recommendation of the Department of Fish and Wildlife.

If the gray wolf ever reestablishes a population in California, the listing will make management of wolves more difficult by eliminating take in most all circumstances. California's management options should not be limited in this way. In a situation where chronic depredation of livestock cannot be abated by non-lethal measures it may be necessary to consider lethal take. That may not be a legal option in dealing with a native California species, but the introduction of a larger and more dangerous animal that is foreign to this state is an entirely different situation.

President Michael Sutton
August 5, 2014
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Sometimes it is better to remove animals that are developing the habit of preying on livestock before the entire pack begins to depend on livestock as a main food source. There may also be situations where wolves may be eliminating an isolated population of elk or other wildlife and relief may be provided by lethal take. An integrated management approach where all tools are considered is a necessary means of wolf management.

The California Department of Fish and Wildlife has also been unable to effectively manage deer and elk herds in California even with the wolf absent. The presence of the wolf will only exacerbate the problem and necessitate effective management measures.

For these reasons, we request that the Commission reconsider this matter at the August meeting in San Diego and reverse the decision to list the gray wolf.

Sincerely,



Michael N. Kobseff
Chair, Board of Supervisors



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May 29, 2014

Michael Sutton
President
California Fish and Game Commission
1416 Ninth Street, Suite 1320
Sacramento, CA 95814

Re: Opposition to Listing the Gray Wolf as an Endangered Species

Dear President Sutton:

I am writing to urge the Fish and Game Commission to deny the petition to list the gray wolf under the California Endangered Species Act, which would be consistent with the determination of the Department of Fish and Wildlife that listing is not warranted.

I would also ask the Commission to support active measures to resist the establishment of any wolf population in California. Farming and ranching are some of Siskiyou County's last viable industries. Farmers and ranchers provide habitat for wildlife, scenic open space, employment, and food and fiber for our people. But wolves and ranching do not mix. Hardships for ranchers will be real and inevitable if wolves become established in California.

With over 5,000 wolves in the lower United States, 8,000 in Alaska, and more than 50,000 in Canada, the gray wolf is certainly not an endangered species. Wolves are not impeded by state or national boundaries and move freely where there is suitable habitat, adequate food supplies, and minimal human populations.

Any vision to return the gray wolf to all of its original range is not realistic. There have been substantial changes in the 80 to 90 years that wolves have been absent from California. One of the most problematic changes is the increase in population density. When compared to human populations where wolves were introduced in the northern Rocky Mountain states, California's population density is at least ten times greater. Another significant change is the decline in the numbers of wild ungulates. Compared to other states with wolves, California's elk population is only about one-tenth of the average statewide populations in Idaho, Oregon, and Montana.

California in the 21st Century cannot support any significant population of wolves and, if wolves are listed, they can be expected to remain in an endangered status indefinitely. This will create perpetual conflict between livestock producers trying to protect their livestock and wildlife managers trying to increase wolf populations to achieve delisting.

Brandon Criss
District 1

Ed Valenzuela
District 2

Michael Kobseff
District 3

Grace Bennett
District 4

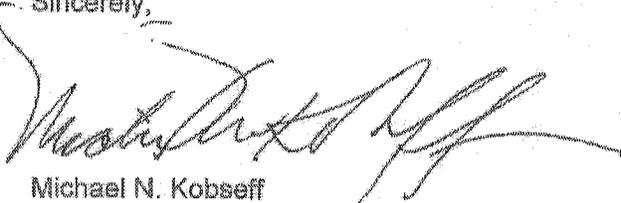
Marcia H. Armstrong
District 5

Michael Sutton
May 29, 2014
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It cannot be overlooked that wolves cause substantial losses to farmers and ranchers who raise livestock. Losses stem from many factors, from the outright killing of animals to reduced weight gains and conception rates. A Montana study showed that calves gained 22 pounds less where wolves were present and preying on livestock when compared to ranches that were not experiencing any wolf-related losses. The lower weight gain resulted in a \$6,600 loss when the calves were sold. With Siskiyou County and neighboring regions being closer to Oregon and Idaho, our ranchers would likely be the first to experience these types of detrimental impacts from a new wolf population.

For these reasons, the Commission should reject the listing of the gray wolf as an endangered species in California and resist any efforts, programs, or changes in laws or regulations that would promote new wolf populations in our state.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael N. Kobseff". The signature is fluid and cursive, with a long horizontal stroke at the end.

Michael N. Kobseff
Chair, Board of Supervisors



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Mr. Jim Kellogg
President
California Fish and Game Commission
P.O. Box 944209
Sacramento, CA 94244-2090

Re: Petition to List Gray Wolf under the California Endangered Species Act

Dear Mr. Kellogg:

We have reviewed the February 27, 2012, petition (Petition) submitted by Brett Hartl and Noah Greenwald to list the gray wolf as an endangered species under the California Endangered Species Act (CESA). Based upon the material presented in the petition, there is not sufficient information to indicate that the petitioned action may be warranted, and the Petition should therefore be rejected.

California Fish and Game Code section 2062 defines an "endangered species" as a native species "which is in serious danger of becoming extinct throughout all, or a significant portion, of its range...." As acknowledged in the Petition, any native gray wolves that may have existed were extirpated from California in the 1920s and have been extinct in California for more than 80 years. The native gray wolf is not "in serious danger of becoming extinct" in what may have once been its California range. If some subspecies of the gray wolf did exist in California in any significant number, it has long been extinct, and that fact is not altered by the wanderings of a lone Oregon wolf (OR7), particularly one that is the progeny of Canadian wolves that were introduced in the Rocky Mountains.

As noted in the Department of Fish and Game's (DFG) August 1, 2012, evaluation of the Petition, the most "biologically critical factor" in evaluating the Petition is population size, which DFG acknowledges to be "one" based on the current presence of OR7. If the Petition is granted based on the presence of one non-native wolf, what are the ramifications for DFG's analysis when:

- OR7 decamps from California?
- The radio-collar battery dies, as early as 2013?
- There is an ultimate failure to self-propagate?
- OR7 meets some other demise?

DFG correctly notes many errors, misstatements, and inaccuracies in the Petition, including the overlooking of various California laws that already afford protection to any types of wolves that may be present in the state. In addition, any gray wolves in California already fall under the

Jim Cook
District 1

Ed Valenzuela
District 2

Michael N. Kobseff
District 3

Grace Bennett
District 4

Marcia H. Armstrong
District 5

protections of the federal Endangered Species Act. Given the lack of any reproducing gray wolf population in California, the Commission should carefully weigh the wolf protections that already exist against the potential regulatory costs and burdens of designating a new candidate species, especially one based on questionable scientific and legal bases.

The Commission should also consider the benefits of allowing the U.S. Fish and Wildlife Service to take the lead in wolf management. Unlike the federal Endangered Species Act, California law does not provide adequate mechanisms to address either reintroduction of an extinct species or the establishment of populations of non-native species. Unless and until the Legislature establishes a deliberate framework to address these situations, the Commission should defer to the U.S. Fish and Wildlife Service and the more flexible authorities afforded by federal law. These authorities include designation of experimental populations and the establishment of special "4(d)" rules, such as the rule for Minnesota that allows the trapping and killing of wolves that have preyed on domestic animals.

Apart from action on the pending Petition, the Commission should approach the entire issue of wolf introduction with great caution and skepticism. Introduction of a depredator into modern-day California presents entirely new management challenges compared to previous wolf introductions in the interior Western states. A comparison of population densities alone should present a sobering warning.

<u>Rank</u>	<u>State</u>	<u>Population Density</u>
11	California	241.70 inhabitants per square mile
44	Idaho	19.15 inhabitants per square mile
45	New Mexico	17.16 inhabitants per square mile
46	South Dakota	10.86 inhabitants per square mile
47	North Dakota	9.91 inhabitants per square mile
48	Montana	6.85 inhabitants per square mile
49	Wyoming	5.85 inhabitants per square mile
50	Alaska	1.26 inhabitants per square mile

It may be tempting to dismiss this comparison of population density by picturing the San Francisco Bay Area or Los Angeles/Orange County and then likening the populations in rural California to those in Montana or Wyoming. However, in a state such as Wyoming, more than half of the population lives in 13 cities, meaning the wolf habitat of the Rocky Mountains is far less populated than a statewide average indicates.

The movement to encourage wolf introduction in more and more populated areas is a recipe for an explosion of the type of wolf incidents that have been occurring in Idaho, Colorado, Montana, and other states over the past decade. For example, DFG's analysis of the Petition notes that mule deer would be the most likely prey species for wolves in California, but then acknowledges that California's deer populations are near their lowest numbers since the early 1900s. The consequence is that livestock will be the most abundant and "natural" source of prey. As stated by DFG on page 8 of the Petition evaluation, "In areas where wolves and livestock coexist, wolves kill livestock, including sheep, cattle, goats, horses, and llamas."

Mr. Jim Kellogg
September 12, 2012
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We would like to express our agreement with Director Bonham's statement in his August 1 memorandum to the Commission that "advance planning" for the management of the wolf is the best course moving forward for both the species and the people of California. It is important to recognize, however, that such planning does not necessitate listing under the California Endangered Species Act and the complications and limitations that listing entails. Instead, there should be a review of the existing Fish and Game Code provisions related to depredators to consider their applicability and effectiveness in addressing wolf-human and wolf-livestock interactions in the event additional wolves migrate into California from Oregon or Idaho.

Sincerely,



Grace Bennett
Chair, Board of Supervisors

cc Karen Ross, Secretary, California Department of Food and Agriculture
Charlton H. Bonham, Director, Department of Fish and Game
Dr. Eric Loft, Wildlife Branch Department of Fish and Game
Mike McGowan, President, California State Association of Counties
Greg Norton, President & CEO, Regional Council of Rural Counties