



RURAL COUNTY REPRESENTATIVES  
OF CALIFORNIA

December 4, 2015

Mr. Jack Baylis, President  
California Fish and Game Commission  
1416 Ninth Street, Suite 1320  
Sacramento, CA 95814

**RE: Addition of Gray Wolf to the List of Endangered Species**

Dear President Baylis:

The Rural County Representatives of California (RCRC) is an association of thirty-four California counties and the RCRC Board of Directors is comprised of elected supervisors from each of those member counties. RCRC member counties are tasked with a variety of decision-making responsibilities related to land use and development in rural California communities and are challenged with environmental stewardship, economic vitality, and social equity at the local level. Many of our member counties also represent the most likely areas for gray wolf repopulation in California, as evidenced by the recently verified presence of the Shasta Pack in Siskiyou County. RCRC recognizes that the California Fish and Game Commission (Commission) has been weighing the decision to list the gray wolf since 2012, and appreciates this opportunity to offer our concerns on the current proposed addition of the gray wolf to the list of endangered species under the California Endangered Species Act (CESA).

At this time, RCRC questions whether the gray wolf meets the requirements for listing under CESA, particularly as the U.S. Fish and Wildlife Service is considering delisting populations of the species and other states, such as Oregon, are electing to delist the gray wolf under their own state laws. CESA requires that a species be in danger of becoming extinct throughout its range, yet the gray wolf population is in actuality increasing and flourishing throughout the western United States. In California, there have been no wolves present until very recently, and the presence of the Shasta Pack is further proof that the species is in fact not in decline, but rather expanding its population, most likely from other states, into areas in California that may not even be provable as native habitat.

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RCRC is also concerned that listing the gray wolf under CESA will undo much of the good work that has been done by the California Department of Fish and Wildlife (CDFW) in concert with various stakeholders on the Wolf Management Plan (Plan). Protections under CESA do not allow for the flexibility to manage a species that the Plan would afford, and will remove some nonlethal options as protective measures against the gray wolves natural predatory behavior. Livestock operations are economically vital to many of our member counties, creating jobs and fostering stewardship between ranching and the environment. An unwarranted listing under CESA will unnecessarily hinder the industry's ability to protect their livestock and potentially harm some of the State's most economically challenged rural communities.

Finally, while we recognize that CDFW maintains that there are no plans for species reintroduction into California, the proposed CESA listing continues to raise questions among our membership as to the State's future plans for its gray wolf population. We would ask that both the Commission and CDFW remain as transparent and open as possible about plans for the species, particularly with respect to repopulation.

If you should have any questions or would like to discuss our comments further, please contact me at (916) 447-4806 or [sheaton@rcrcnet.org](mailto:sheaton@rcrcnet.org).

Sincerely,



STACI HEATON  
Regulatory Affairs Advocate

cc: Charlton Bonham, California Department of Fish and Wildlife  
RCRC Board of Directors