

March 17, 2025

Michael Fris
Field Supervisor
U.S. Fish and Wildlife Service
Sacramento Fish and Wildlife Office
2800 Cottage Way
Sacramento, CA 95825

Re: FWS-R8-ES-2023-0157; Endangered and Threatened Species: Designation of Critical Habitat for Four Distinct Population Segments of the Foothill Yellow-Legged Frog

Dear Mr. Fris:

The organizations listed below appreciate the opportunity to provide comments on the U.S. Fish and Wildlife Service (Service) proposal to designate critical habitat for four distinct population segments (DPSs) of the foothill yellow-legged frog under the federal Endangered Species Act. Cumulatively, our membership either resides in or manages nearly 50% of the state's land as well as substantial water resources, making our organizations particularly concerned with the potentially negative impact of this proposal.

Currently, a total of 760,071 acres in California fall within the boundaries of the proposed critical habitat designation. If finalized, we also calculate the proposal would impact over 363,00 acres of private land broken down as follows:

- North Feather DPS – 87, 401 acres
- South Sierra DPS – 93, 357 acres
- Central Coast DPS – 174,989 acres
- South Coast DPS – 7, 394 acres

This proposal is large in scope with significant public (state and federal) and private land acres impacted. Due to the anticipated broad and varied effects of this critical habitat proposal, we respectfully request that the Service extend the public comment period by no less than 90 days. An extension would assist stakeholders and local communities with additional time to fully understand the range, scope, and potential impacts and provide appropriate feedback to the Service accordingly.

Thank you for your consideration of this request.

Sincerely,
Association of California Water Agencies
California Cattlemen's Association
California Farm Bureau

Family Farm Alliance
Public Lands Council
Rural County Representatives of California