



July 14, 2025

Paul Souza, Director  
U.S. Fish and Wildlife Service  
1849 C Street, NW  
Washington, DC 20240

**Subject: Request for Federal Delisting of Gray Wolves**

The Tri-Counties (Siskiyou and Modoc, California and Klamath, Oregon) respectfully request that the U.S. Fish and Wildlife Service (“the Service”) continue efforts to delist the gray wolf (*Canis lupus*) from the federal Endangered Species Act (ESA).

We appreciate the Service’s 2020 decision to delist the species based on recovery progress, as well as its 2024 “not warranted” finding in response to petitions seeking to relist gray wolves in the Northern Rocky Mountains and Western United States. That finding reaffirmed the Service’s conclusion that gray wolves in these regions do not currently face extinction risk and do not meet the criteria for ESA listing. We also acknowledge the Service’s ongoing work to develop a nationwide wolf recovery plan. Building on these efforts, we urge the Service to initiate a new rulemaking process to remove the gray wolf from federal protections.

As the Service continues to evaluate wolf populations at the national level, we ask that equal consideration be given to the substantial and growing impacts wolves are having on rural communities in regions where population recovery has already occurred. Continued federal listing places increasing strain on communities across the Tri-Counties, where expanding wolf population and activity have resulted in significant livestock losses, disrupted grazing operations, mounting economic hardship, and a safety threat for ranching families.

In Siskiyou County alone, there have been over 80 confirmed and 9 probable livestock kills linked to wolves since 2021. Given the county’s remote and heavily vegetated terrain, actual losses are likely much higher. Some estimates propose actual losses may be up to eight times higher than confirmed kills, as carcasses are difficult to locate and evidence is often lost over time. One ranch in the Shasta Valley has reported more than 40 confirmed depredations alone. Additionally, the Siskiyou County wolf liaison recently reported that the Whaleback Pack, which dens within the county, had at least nine new pups this year, underscoring how quickly wolf populations can grow and reinforcing the need for flexible local management.

These impacts extend beyond direct kills. The persistent presence of wolves near livestock causes chronic stress, reduced weight gain and reproductive success, particularly in beef cattle. These indirect effects threaten the long-term stability of local ranching operations and have broader impacts on rural economies that depend on working lands and agriculture. Local

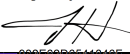


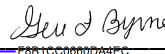
governments, landowners, and western state agencies have invested in monitoring, non-lethal deterrents, and other coexistence strategies. However, wolf numbers and territory continue to expand, leading to additional livestock losses and undermining the economic viability of ranching businesses.

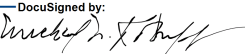
Communities have also voiced concern about potential future ripple effects, including localized declines in deer and elk populations that could affect ecological balance and hunting-based economies. At the same time, as wolves grow more accustomed to human presence and prey availability shifts, families are increasingly concerned about wolves hunting livestock closer to ranch homes, where children live and play.

Given these realities, we urge the Service to move forward now with the formal delisting of the gray wolf under the Endangered Species Act. The species no longer meets the criteria for federal protection. Updating its status will allow states and local partners to manage impacts more effectively while continuing to support long-term recovery and ecological balance through responsible, localized management strategies.


Sincerely,

Signed by:  
  
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Jess W. Harris, District 1  
Siskiyou County Board of Supervisors

Signed by:  
  
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Geri Byrne, District V  
Modoc County Board of Supervisors

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Michael N. Kobseff, District 3  
Siskiyou County Board of Supervisors

Signed by:  
  
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Derrick DeGroot  
Klamath County Commissioner

Signed by:  
  
374E7C150FAD405...  
Ned Coe, District I  
Modoc County Board of Supervisors

CC: Senator Megan Dahle  
Assemblymember Heather Hadwick  
Rural County Representatives of California  
Congressman Cliff Bentz  
Congressman Doug LaMalfa