

# California Fish and Wildlife Strategic Vision Project

## Potential BRCC and SAG Compliance Recommendations

January 18, 2012

On January 10, 2012 during the California Fish and Wildlife Strategic Vision (CFWSV) Blue Ribbon Citizen Commission (BRCC) and Stakeholder Advisory Group (SAG) compliance discussion topic meeting, four areas of potential recommendations were identified: permitting, integrated resource management, partnerships, and enforcement. Individual BRCC and SAG members, as well as participating California Department of Fish and Game (DFG) and California Fish and Game Commission (F&GC) employees, volunteered to develop text for potential recommendations in the four areas. This document highlights the potential recommendations developed through the work of those volunteers over the last week and during discussion on January 17, 2012.

### Potential Permitting Recommendations

***Potential Permitting Recommendation #1: As part of a broader improvement to the permitting process, provide adequate resources to DFG for assisting applicants with pre-project planning in advance of submitting a permit application (e.g. state incidental take permits and streambed alteration agreements)***

Implementation recommendations include:

- A. DFG staff holds regular workshops for members of the public to inform project planning and permit applications
- B. Fund dedicated staff time to serve as project pre-planners to aid with planning and application preparation
- C. DFG permitting staff hold “office hours” to allow dedicated time to interface with project proponents
- D. Create a user-friendly manual and or on-line information that helps guide project applicants through the planning and permitting process including information on when best to engage with DFG staff
- E. Update and maintain appropriate DFG contact information on the DFG website.

Description: Efficiencies are captured when DFG and project proponents communicate about projects often and well in advance of preparing and submitting a permit application (e.g. state incidental take permits and streambed alteration agreements). During such early consultations, DFG staff is able to visit proposed project sites and clearly communicate project features necessary to meet statutory requirements and permit issuance criteria; project proponents are better able to submit successful applications. Both DFG and applicants spend less time and resources during application preparation, submittal, and review and during the permit preparation process.

Constraints: At current staffing levels DFG staff does not have adequate time to spend with project proponents engaging in such proactive and desirable actions. This is because of the statutory time limits for permit review; available staff must focus on permit issuance to satisfy permitting deadlines as opposed to pre-project planning. In addition, for state incidental take permits issued to satisfy the

California Endangered Species Act (CESA), there is insufficient funding of staff for review or issuance of these permits (with the exception of some renewable energy projects); the number of staff funded by General Fund (GF) or Environmental License Plate Fund (ELPF) have dwindled due to past cuts. These GF and ELPF funded positions have multiple responsibilities and time for the above potential actions is limited. Additional staffing and/or alternate allocation of staff time is needed to realize the strategic goals of better communication, efficiency, collaboration, and transparent decision making.

#### Implementation Assessment

- Method: Administrative and legislative (funding)
- Timeline: ?
- Level of likely BRCC/SAG agreement: ?

Ties to Strategic Vision: Goal 4, Objective 1; Goal 4, Objective 2

***Potential Permitting Recommendation #2a: Establish an inter-agency coordination process in the review of CESA incidental take permit applications and streambed alteration agreements (Question: should this more broadly apply to other permits or agreements? "Improve coordination with other regulatory state agencies")***

Implementation recommendations include:

- A. Use or create where necessary joint state, federal, and local review teams that bring all the permitting agencies to the table at the same time to review a proposed project and any associated permit applications
- B. Develop legislation that encourages the formation/use of such joint review teams that either offers incentives or requires agencies to come to the table

***Potential Recommendation #2b: Make the application review and permit preparation process more consistent and transparent to applicants.***

Implementation recommendations include:

- A. Have DFG develop and maintain an online permit tracking system so that applicants are able to follow their DFG permit through the review process.
- B. Provide CESA and permit issuance training for DFG staff to ensure consistent review of permits.

Description (note that portions of this text may apply to both 2a and 2b; may ultimately need to be split): Review of permit applications and preparation of permits such as state incidental take permits and streambed alteration agreements (for DFG) consumes the time of the agency project lead, leaving little time for advanced coordination. In addition, applicants find it difficult to plan projects that meet the needs of all permitting agencies (state, federal, and local) given that staff from different agencies often give conflicting requirements, in part due to differences between the various applicable laws. Improving the coordination between the various permitting agencies, allowing the applicant to engage

with all of the permitting agencies simultaneously, and making the permit requirements more transparent to the permittee would realize great efficiency. One model of a multi-agency review group that has proven successful is dredging permits in the San Francisco Bay where permit applications are reviewed by all permitting agencies at one time. There is a perception that DFG staff handles the permitting process inconsistently. Having a training program in place would aid in consistency and would give applicants more confidence in staff determinations.

Constraints (note that portions of this text may apply to both 2a and 2b; may need to be split): Agencies are often unwilling or unable to come to the table, and setting up a joint review process may take several years and may require formal encouragement. The state is not able to force the federal agencies to participate and may not be able to force local agencies to participate in a joint review process. Instituting and maintaining an online tracking system would require funding/staffing and time. Ongoing training requires staff time and some expense. Established timelines under statute may limit ability to convene joint review teams.

#### Implementation Assessment

- Method: Legislative, budgetary, and administrative
- Timeline: ?
- Level of likely BRCC/SAG agreement: ?

Ties to Strategic Vision: Goal 3, Objective 1; Goal 4, Objective 2

#### ***Potential Permitting Recommendation #3: Remove permitting barriers to “small scale” restoration projects***

Implementation recommendations include:

- A. Create a statutory exemption under the California Environmental Quality Act (CEQA) for small scale restoration projects
- B. Create a Programmatic Streambed Alteration Agreement and associated process under Fish and Game Code Section 1600 et. seq.
- C. Create an affordable fee structure for restoration projects pursuant to Fish and Game Code Section 1600 et. seq.
- D. Discussion: The statutes and regulations discussion participants suggested that a new bullet be added here that says “Investigate other projects where a targeted CEQA exemption would be valuable.” This is intended to broaden beyond small-scale habitat restoration projects.

Description: Proponents of small scale restoration projects often have difficulty in obtaining the necessary permits despite the environmental benefits associated with such projects; this is due in part to the timelines and expense of the CEQA process and associated document preparation. While there is an existing categorical exemption (CE) under CEQA for small scale (<5 acres) restoration projects, a CE cannot be used if there is a potential for significant environmental impacts, including but not limited

to potential impacts to special status species. Since issuing a streambed alteration agreement pursuant to Fish and Game Code Section 1600 et. seq. is a discretionary action under CEQA, a CEQA analysis and associated document preparation either by DFG as a lead agency or as a responsible agency is necessary. There is currently not a Programmatic Streambed Alteration Agreement under Fish and Game Code Section 1600 et. seq., and master streambed alteration agreements are cost prohibitive to entities like resource conservation districts who often are trying to obtain programmatic type permits to facilitate small landowner restoration projects on private property.

Discussion: The statutes and regulations discussion participants suggested that the description include new language: “The fee for programmatic agreements needs to be low and DFG needs to keep its costs low on these agreements. The costs of the programmatic agreements should not be passed onto other users.” Participants also suggested the possibility of merging the two descriptions. Additional description language from the former (Jan. 18, 2012) Potential Statutes and Regulations Recommendation #6:

“There is currently a categorical exclusion under CEQA for small scale habitat improvement projects. However the exclusion is not useable in areas in or near the habitat of listed species. Many of these improvement projects are designed to improve habitat for listed species rendering the categorical exclusion useless. The statutory exemption would need to include a much wider range of improvement projects to make it worthwhile. There are other projects permitted by DFG where discussion would be valuable regarding agreement on other targeted statutory CEQA exemptions.”

Constraints: Legislative process and associated timelines. There may be environmental group opposition to such an approach because of the inability to participate in the environmental review (CEQA) process.

#### Implementation Assessment

- Method: Legislative
- Timeline: Mid-term
- Level of likely BRCC/SAG agreement: Medium to high

Ties to Strategic Vision: Goal 2, Objective 2; possibly Goal 3, Objective 1 [Potentially add Goal 2, Objective 1; Goal 4, Objective 2 from the former (Jan. 18, 2012) Potential Statutes and Regulations Recommendation #6.

#### ***Potential Permitting Recommendation #4: Develop a set of criteria and implementation guidelines for “beneficial projects.”***

Description: DFG projects on DFG properties are often restoration, habitat enhancement, maintaining or protecting species or habitat and can fall under a general descriptor of “beneficial projects.” Beneficial projects are also often proposed by private landowners in conjunction with grants received,

and where not part of a compensation or mitigation effort, should be considered differently than a project that is impacting a species or habitat and causing a loss or a take. Methods, timing of projects, best management practices and a post-project greater value should be considered during the permitting stage of the project.

Implementation recommendations include:

- DFG to work with the California Coastal Commission on those projects in the Coastal Zone that meet criteria for beneficial project so that permitting timelines and permit conditions are not so onerous that the projects cannot be accomplished.

Implementation Assessment

- Method: Administrative, perhaps budgetary and legislative (Coastal Act changes?) in future years
- Timeline: Continuing
- Level of BRCC/SAG agreement: ?

Ties to Strategic Vision: ?

### **Potential Integrated Resource Management (IRM) Recommendations \***

\*For specifics see below potential IRM recommendation #2 for suggested selected characteristics of effective “targeted” multi-agency collaboratives.

Definition of IRM: *“A planning and decision making process that coordinates resource use so that the long-term sustainable benefits are optimized and conflicts among users are minimized. IRM brings together all resource groups rather than each working in isolation to balance the economic, environmental, and social requirements of society.”* [Nova Scotia, Canada, Department of Natural Resources, from California Natural Resources Agency, “The Future of Natural Resource Management”, December 2010]

### ***Potential IRM Recommendation #1: Engage in effective integrated resource management processes.***

Implementation recommendations include:

- A. DFG fully commit to a leadership role on the steering committee for the National Fish, Wildlife and Plants Climate Adaption Plan.
- B. DFG involvement in leadership role in Western Association of Fish and Wildlife Agencies (WAFWA) committees.
- C. DFG participation on the State Agency Steering Committee for preparing California Water Plan Updates.

- D. DFG participation in the Renewable Energy Policy Group established by the Office of the Secretary of the Interior, the Governor’s Office and the California Natural Resources Agency as well as under its aegis, the Renewable Energy Action Team, comprised of USFWS, BLM, CEC, DFG and the California Natural Resources Agency, among others.

Description: Current processes fall short and result in inefficient or unsatisfactory results. The intent of this action is for DFG and F&GC to support and participate in “targeted” multi-agency collaboratives that will effectively promote IRM among state and federal natural resource permitting, and action agencies and/or multi-agency/user natural resource stakeholder groups to achieve: Improved sharing of data, information, tools and science among agencies; better alignment of planning, policies and regulations across agencies; coordinated and streamlined permitting; regulatory certainty; increased coordination with all levels of government agencies (federal, tribal, state, local), stakeholder groups, private landowners, and others; and increased effectiveness through leveraging of existing networks, relationships, and multi-agency venues.

#### Implementation Assessment

- Method: DFG, F&GC, and Natural Resources Agency administrative, budgetary
- Timeline: Short-term
- Level of likely BRCC/SAG agreement: High / top 1-3

Ties to Strategic Plan: Goal 1, Objectives 2 and 9; Goal 2, Objective 2; Goal 3, Objective 1

***Potential IRM Recommendation #2: Use more collaborative processes that combine regulatory agencies with landowners, conservation organizations, and local agencies on restoration/enhancement projects. [B:25, B:15]***

- Example is the conservation assessment partnership between CalTrans and DFG [No.11, Bullet 1]
- Work with organizations that outreach to landowners to help create stronger relationships with private landowners [B:26]
- Variation: work with landowners themselves to provide solutions to common issues [e.g. invasive species]

***Potential IRM Recommendation #3: State agencies have specific expertise in some areas but not others, and should utilize each other as resources as needed.***

- Departments under the California Natural Resources Agency (and those state agencies with a resources and/or regulatory nature) should meet to determine how they can effectively partner to achieve common goals specific to education, restoration, land acquisition, land management, and species and habitat monitoring. Additionally, those agencies with expertise not found in or very limited within DFG but needed for the implementation of DFG projects (e.g. archaeology, engineering, hydrology, landscape architecture and facility planning) should be able to be “contracted out” to conduct necessary tasks.

- DFG staff should also be able to be “contracted out” more so for focused species and habitat assessments or work (e.g. vegetation mapping recently or currently done by BDB for California State Parks, San Diego Association of Governments, etc.)
- Those departments with more staff and/or more specific expertise in public works contracts, or that have higher or less stringent delegated authority should coordinate with those that do not.

#### Implementation Assessment

- Method: Administrative, perhaps budgetary and legislative in future years
- Timeline: Continuing
- Level of BRCC/SAG agreement: ?

Ties to Strategic Vision: ?

#### ***IRM recommendation? Suggested, selected characteristics of effective “targeted” multi-agency collaboratives that encourage integrated resource management in achieving natural resource stewardship (essentially a description of IRM)***

Multi-agency collaboratives, whether formally established or ad hoc “task forces”, have structural and functional characteristics that make them more effective in furthering the mandates and missions of each participating agency and employing integrated resource management in achieving natural resource stewardship. Some of the characteristics include:

- A clear statement of purpose and development of short- and long-term goals and objectives; action plan and specific strategies; ongoing evaluation of work and attainment of goals; and continual review of progress and new opportunities.
- A shared recognition of the benefits accrued through joint action(s), especially when faced with limits on individual organizational resources.
- Sufficient alignment, information sharing, and mutual understanding of core values, resource planning, policies, and regulations of the collaborating agencies.
- Clear, strong, and sustained political support and direction from leadership at the federal, state, and local levels (e.g., executive orders that articulate policy direction largely common to all participating agencies and/or legislation).
- Agreements, such as memoranda of understanding or agreements, reflecting policy direction that clearly describe mutually agreed on commitments, roles and responsibilities, dispute resolution, objectives, and statements of mutual support and collaboration.
- A stable cadre of professionals from each agency that is dedicated to multi-agency collaboratives, which receives sustained and adequate support, even in the face of budget cycles and leadership changes, to achieve objectives stated in multi-agency agreements such as MOU/MOAs.
- A “targeted” or focused resource or use sector (e.g., wildlands, agriculture, water, oil and mineral development, urban growth, transportation, energy) that is geographically focused

(e.g., ecoregion, coastal areas, Central Valley, Sacramento-San Joaquin Delta, urban areas, desert region) in which the collaborating agencies engage.

- A designated lead agency while shared leadership is maintained; an executive committee; and interagency/inter-disciplinary structure that helps collaboratives move forward toward attainment of group goals.
- Internally aligned agency hierarchical structures, including policy/leadership, management and planning, and technical levels, with clear demarcations of roles and responsibilities.
- Sufficiently frequent meetings of agency representatives at various levels to provide forums for identifying problems and barriers, monitoring progress, and documenting success.

### **Potential Partnerships Recommendations**

Definition: The SAG has used the term “partnerships” as a very general concept rather than solely relationships based on a formal MOU or other legal agreement. It is intended to include all forms of collaboration, both formal and informal.

Barriers: While stakeholders view their offers to help as adding to DFG’s capacity, at times these arrangements may use more resources than they replace, due to training, supervision and other DFG involvement. Additionally, labor laws may preclude the use of ‘volunteer’ labor in some instances. Insurance and liability issues create further barriers.

Partners: Potential “partners” include federal, state, and local agencies as well as non-governmental organizations, landowners, businesses, and individuals.

#### ***Potential Partnerships Recommendation #1: Utilize partnerships to promote the DFG/FGC mission***

Description: DFG’s stakeholders can also be the biggest supporters. The department should utilize this support by encouraging and enabling stakeholders to educate lawmakers regarding DFG programs. This could include proposed legislation or budget issues. When developing such a program the perception of favorable treatment for partners should be a considered. This would also leverage local resources.

Implementation recommendations include:

- Create a State Parks Foundation type organization

Implementation Assessment

- Method: Administrative, perhaps budgetary
- Timeline: Continuing
- Level of BRCC/SAG agreement: Extremely high



Ties to Strategic Vision: Common Themes #2; Goal 4, objectives 3 and 4

***Potential Partnerships Recommendation #2: Encourage a broad-based coalition effort of outdoor organizations [both consumptive and non-consumptive] to tap into their memberships to support the DFG/FGC mission [B:31]***

- Combat poaching
- Combat pollution
- Combat illegal sales of wildlife [parts]
- Promote habitat restoration
- Promote increased enforcement presence to protect wildlife resource

Implementation Assessment

- Method: Administrative, perhaps budgetary and legislative in future years
- Timeline: Continuing
- Level of BRCC/SAG agreement: Extremely high

Ties to Strategic Vision: Common Themes #2, Goal 1 Objectives 1 and 9

***Potential Partnerships Recommendation #3: Foster effective partnerships to better meet DFG mission (creating/sustaining partnerships)***

Regional Staff will meet semi-annually to define and assess new and existing partners through a common-ground or SWOT (strengths, weaknesses, opportunities and threats/constraints) assessment and develop and maintain a list of partners. With each partner, both DFG and the partner should define their respective roles, purposes and desired outcomes, Develop memorandums of understanding (MOUs) where appropriate, communicate on a frequent basis and work toward achieving deliverables/products.

Types of Partners

- Stakeholder Groups
- Other Resources Agencies
- Other Regulatory Agencies
- Land owners
- NGOs
- Interested Parties
- Universities
- Internal
- Local Jurisdictions
- Elected officials

Implementation recommendations include:

Regions and HQ staff will meet annually to integrate regional partnership efforts with Statewide Strategic Initiative #4 and DFG's vision effort.

- Specific recommendation: Revisit DFG's Partnership Strategic Initiative; revamp and implement on a statewide basis.

Implementation recommendations include:

Department personnel will strive for efficiency while developing and sharing partnership templates (MOUs, MOAs, Cooperative Agreement, contracts,) check lists, or other documents prepared under current mutually beneficial partnerships. Federal Grant forms and templates can be used as a starting point.

- Specific recommendation: Revamp DFG Volunteer Coordinator Program and have a regional and branch staff person act as the designated point of contact.

Implementation Assessment

- Method: Administrative, perhaps budgetary
- Timeline: Continuing
- Level of BRCC/SAG agreement: High

Ties to Strategic Vision: Common Theme #2

## Potential Enforcement Recommendations

### ***Overarching Potential Enforcement Recommendation: Increase Enforcement Efficacy***

#### ***Potential Enforcement Recommendation #1: Ensure successful recruitment and retention of California fish and game wardens***

Implementation recommendations include:

- A. Move California fish and game wardens into a peace officer only labor union
- B. Develop equitable pay and benefit formulas

Description: The current pay structure for game wardens is significantly lower than that of other California law enforcement agencies of similar or greater in size. This discrepancy is further exacerbated by the fact that DFG's sworn officers are required to have a college education and have greater level of independent responsibility in completing their duties. An example of this discrepancy is illustrated by the fact that the DFG chief of patrol, who has responsibility for the management of almost 400 sworn officers annually earns less than a first-line supervisor (sergeant) in the CHP; to further illustrate, an assistant chief earns less than a rank and file traffic officer with the CHP.

Justification for pay parity and benefits include but are not limited to:

- To allow for more commutative recruitment of highly qualified applicants.
- To attract and recruit highly qualified law enforcement professionals for employment.

- Maintain retention of highly qualified and trained officers
- Minimize the migration and improve retention of officers leaving high cost living areas.
- Allow new officers who gain experience in high cost coastal areas dealing with complicated marine regulations to remain in the area and provide for consistent and knowledgeable service to the public.
- Improve and enhance the recruitment of diversified workforce.
- Minimize the need for secondary employment of existing officers.
- Improve and enhance interest in upward mobility of highly qualified personnel.
- Motivate enforcement personnel to maintain and improve their educational skills and abilities for the benefit of DFG.

#### Implementation Assessment

- Method: Legislative/administrative
- Timeline: Short-term/medium-term
- Level of likely BRCC/SAG agreement: High / top 1-3

Ties to Strategic Vision: Goal 2, Objective 1

#### **Potential Enforcement Recommendation #2: Seek authority or sponsor legislation to:**

- (1) establish egregious and illegal commercialization cases as felony statutes;**
- (2) increase penalties for certain misdemeanors up to and include lifetime privilege revocation;**
- (3) include FGC violations in criminal histories; and,**
- (4) limit diversion to once per two years per violator.**

Description: Current criminal penalties are not sufficient to deter illegal wildlife crimes, particularly when the resource has a high commercial value. In many cases, the illegal take penalty is far less expensive than a legal means to take a species. **Insert new example: Some traffic fines are more expensive than fines for bear poaching.** While a felony statute is the priority, given the legislature's past resistance to creating new crimes leading to state prison, other ideas are included here to create additional deterrents and to assure our laws and their enforcement are improved to allow for adequate protection of the resources. A serious wildlife poacher would rather pay a fine than to lose his or her privilege to hunt or to lose their prized firearm.

The option of diversion is practiced in many counties. When a prosecutor sends a person caught violating wildlife laws to diversion, they pay a small fee to the DA's office, pay a nominal fee to take an ethics course (like "traffic school") and avoid a conviction for a wildlife crime. The violation therefore does not count toward a possible loss of privileges if caught in subsequent years.

#### Implementation Assessment

- Method: Legislative

- Timeline: Short-term/medium-term
- Level of likely BRCC/SAG agreement: High / top 1-3

Ties to Strategic Vision: Goal 2, Objective 1

***Potential Enforcement Recommendation #3: Increase the number of DFG warden positions by 50 per year until the force totals 1,000.***

Description: California has a population of 37 million people yet our warden force remains at 1970s level when our population was 20 million. California's population has a great effect on the resource. Hunter and angler numbers may have decreased, but that has been replaced by greater population impact on the environment. California is confronting increased human-wildlife conflicts, depredation, development, renewable energy, non-consumptive recreational use, and pollution and water quality issues. Additionally, with more awareness of environmental issues the legislature has, on a yearly basis, passed more laws and mandates such as the MLPA, condor lead shot ban, and mandatory pollution response that have affected our law enforcement staff.

More and more with increased communication and improved technology there is an expectation on the part of the public and other department employees that DFG provide 24/7 year-round service. Without adequate warden staffing levels this is all but impossible. To even approach this level of public and department service and, without a staffing study, we believe we would need 1,000 sworn officers who are adequately supported administratively. These officers will provide immediate relief to current staff and allow for more timely response, the ability to focus on more investigations, greater permit compliance monitoring and an increased capacity to work with department staff to ensure regulatory mandates are carried out.

With current staffing levels, there has been created a situation where wardens, other DFG employees and the public are frustrated with the level of enforcement response and resource protection. Officers feeling obligated to DFG and the community cancel vacations, work extended shifts in excess of 18 hours, and create situations where supervisors are forced to give mixed messages such as get it done but manage your time. These extended hours and canceled vacations lead to burned out employees, anger, lower morale and, in some cases, diminished performance; this leads to more personnel complaints to the legislature and DFG and a breakdown in communication between law enforcement and other department functions.

An increase in wardens would also allow wardens to work with biologists and environmental scientists on projects that require long-term, concentrated efforts due to the complexity and investigation time required to put together a strong case. Without an adequate number of officers, the constant demand of day-to-day calls does not allow adequate time needed to follow up on more complex investigations.

In states like Texas and Florida, the warden force is already in the 700-1200 officer range. California's natural resources deserve comparable protection.

#### Implementation Assessment

- Method: Budgetary
- Timeline: Long-Term
- Level of likely BRCC/SAG agreement: Moderate to high / top 1-3

Ties to Strategic Vision: Goal 2, Objective 1

***Potential Enforcement Recommendation #4: Establish a state wildlife crimes prosecutorial/judicial task force (including DFG, California Attorney General's Office, California District Attorneys' Association, Judicial Council, U.S. Attorney General's Office, etc.) to identify new approaches to shared or specialized adjudication of environmental/wildlife crimes.***

Description: There is a tremendous disparity across California in the adjudication of environmental/wildlife crimes, with some jurisdictions either incapable (due to workload or lack of familiarity with the codes) or unwilling to process FGC violations to the level desired by Californians. The CDAA's circuit prosecutor project functions to support district attorneys (DA) in a number of counties for such crimes, but its staff is limited both by the short supply of prosecutors and by the necessity for invitation by a DA. The task force would be convened to review and evaluate the existing situation and to propose and implement improvements in prosecutions. The task force should include public participation and targeted outreach.

#### Implementation Assessment

- Method: DFG and/or F&GC administrative; Legislative
- Timeline: Short-term/Medium-term
- Level of likely BRCC/SAG agreement: Moderate to high / top 1-3

Ties to Strategic Vision: Goal 2, Objective 1

***Potential Enforcement Recommendation #5: Dedicate administrative support in each law enforcement district***

Description: Currently, approximately 20% of peace officer time is spent on administrative activities. When the "straightline" re-structuring of the DFG Law Enforcement Division (LED) occurred in 2004, adequate support staff was not part of the transition; support activities were going to be provided by the regions. However, support provided by the regions is limited and many times non-existent. This is a result of not having direct support personnel under the reporting structure of the LED chief.

A comparison to other existing law enforcement departments with approximately the same number of officers has a much larger support structure. CHP has 30% to 35% of direct support staff to sworn officer. LED currently has 392 officers and 10 (2.6%) support staff that report directly to LED. Given the existing DFG administrative structure, for LED to function in a comparable fashion an immediate increase to between 118 and 137 administrative staff would be required. As sworn staff levels

increase, administrative staff would need to increase accordingly; this can be achieved through new positions or through reallocation of existing DFG administrative staff, as long as reporting authority is clear.

#### Implementation Assessment

- Method: DFG and/or F&GC administrative
- Timeline: Short-term/Medium-term
- Level of likely BRCC/SAG agreement: Moderate to high / top 1-3

Ties to Strategic Vision: Goal 2, Objective 1