

[Commented via e-mail on 12/4/13]

We do not see a specific due date and request these comments be considered.

You state:

***Vision for the 2015 Update Process***

*Through the California State Wildlife Action Plan, the Department of Fish and Game seeks to conserve the resources in the nation's most biologically diverse state. We seek to create a flexible but scientific process to respond to changing challenges, including population growth, the need for renewable energy, and global climate change. The Department seeks to make best use of limited resources while developing lasting partnerships and increasing public participation in the conservation and management of California 's valued natural resources.*

Comments:

The Vision fails to address density and does not incorporate watersheds and ecosystems as part of the Vision.

You state:

***Intended Audience***

*The SWAP-2015 is intended to be used by natural resource managers and practitioners working towards the shared goal of keeping common species common through strategic conservation planning. Recognizing that conserving wildlife in California requires the efforts of law enforcement, biologists, land managers, research scientists, water resource experts, city and county planners, landowners, developers, educators, policy-makers, and many others, the SWAP-2015 will be based on science but not written in a scientific or highly technical fashion. SWAP-2015 will however provide more specific and technical information in companion plans specifically focused on activities conducted by public and private entities that have compatible benefits for fish, wildlife and habitats. Companion plans will be developed for land use management, agriculture, forests and rangelands, water use and management, transportation, tribal lands, and consumptive uses. Much of the SWAP update is a description of biological or ecological information and issues. An effort will be made to present the issues concisely using common terminology for a general audience. Where technical terms or concepts are used, they will be defined.*

Comments:

Intended Audience is too restricted for any sustainable result considering the Vision statement of:

*We seek to create a flexible but scientific process to respond to changing challenges, including population growth, the need for renewable energy, and global climate change*

More than Conservation Planning is Land Use Planning and Management. This Vision needs to extend to the preservation of migration patterns and procreation of wildlife.

Urban Planners do not address Wildlife as part of an ecosystem and watershed sustainability. The deficiency is not just City Planning Departments such as the City of Los Angeles , but Metropolitan Planning Organizations like SCAG Southern California Association of Governments and COG Council of Governments.

Watersheds are addressed by Water related departments such as Public Works or Water Utilities.

Developers are the kingpins and the ultimate drivers of the City Planning management or Elected Officials (decision-makers). Not only do Developers not care about water or watersheds, they care less about wildlife.

Conservation Element of the General Plan, in the City of Los Angeles , was adopted September 26, 2001, CF 01-1094 superseding the Open Space Element originally adopted June, 1973 and the Conservation Element originally adopted December, 1973.

Lacking is the legal requirement for current planning and lack of oversight of execution.

Mandatory Findings of Significance under CEQA should be addressed as a deterrent to the statewide goals.

SEA Significant Ecological Areas should be adhered to as a viable designation.

HIDDEN CREEK ESTATES PROJECT, a future development in LA County, wants to be annexed to the City of Los Angeles , while trying to bypass any LA County jurisdiction including the LA County Flood Control District. City of Los Angeles Planning Commission approved the project without even an application being filed with LAFCO Local Agency Formation Commission of Los Angeles County.

This approval is not legal without an annexation and analysis of cost-benefits/loss.

Watersheds and wildlife were not taken seriously.

BALLONA WETLANDS ECOLOGICAL RESERVE is being designed for future development, as a catch basin without regard for the funding used for the preservation and the natural characteristics of the reserve.

Without the Agency proactive comment input during the CEQA period, any Wildlife Action Plan will never be addressed on a serious level.

Influences from Public-Private Partnerships outweigh the conservation planning and upset the natural flow.

The economics are never analyzed as part of the process.

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