



November 19, 2013

Armand Gonzales
California Department of Fish and Wildlife
1416 Ninth Street, Suite 1341-B
Sacramento, CA 95814
swap@wildlife.ca.gov

Re: Comments on the State Wildlife Action Plan 2015 Update

Dear Mr. Gonzales:

The Bay Area Open Space Council appreciates the chance to comment on the State Wildlife Action Plan (SWAP) 2015 Update. The Council collaborates with land trusts, public agencies and conservation organizations to set and execute a conservation vision for the San Francisco Bay Area. For the past 23 years, we have been working regionally to protect the land, connect people to land, and convene efforts to steward parks, trails, and agricultural lands. More at: www.openspacecouncil.org.

We applaud the work on the SWAP Update. The State Wildlife Grants Program is important for habitat protection and Wildlife Action Plans are used to prioritize support for species of "greatest conservation need." The 2015 SWAP Update is being prepared in light of several new conservation initiatives; and yet the Update fails to refer to a few important initiatives. The SWAP will leverage resources and be much stronger if the Plan utilizes regional conservation plans and data. We request that the Department of Fish and Wildlife (DWF) recognize, integrate, and reference the following science-based regional conservation data within the SWAP 2015 Update:

- (1) The Conservation Lands Network
- (2) Critical Linkages: Bay Area and Beyond
- (3) Terrestrial Biodiversity and Climate Change Collaborative (TBC3) data

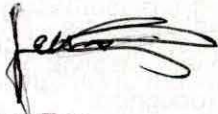
In particular, the Bay Area has the established and recognized Conservation Lands Network, a collaborative five-year science-based study that identifies the most essential lands in the Bay Area needed to sustain biological diversity. The Conservation Lands Network and accompanying conservation plans will aid in the development of relevant regional targets, particularly in the North-Coast, Central California Coast, Central California Coast Ranges, and San Francisco Bay Delta Regions. While it is difficult to scale-up finite data developed locally and regionally, the DFW can utilize—and at a minimum, reference—the Conservation Lands Network, and the Bay Area Critical Linkages report, and the TBC3 data to better define regional conservation targets and to strengthen the SWAP Companion Plans.

We commend the Department of Fish and Wildlife in its effort to acknowledge climate change uncertainty in the conservation strategies of the SWAP. Relying on national and state scale data, again, limits the relativity of the conservation strategies. The TBC3 data – to be published in December 2013 - could directly inform those strategies. We also encourage that the Department of Fish and Wildlife leverage and invite regional and organizational expertise while drafting each of the Companion Plans. The GIS data for these efforts can be downloaded at www.bayarealands.org. Additional research is available through the Bay Area Ecosystems Climate Change Consortium www.baeccc.org.

We also encourage the DFW to be more specific in their use and definition of the term "inappropriate grazing." While over-grazing can be a threat to some wildlife habitat, there are many cited studies with evidence that grazing can enhance wildlife habitat (e.g., Marty, J.T. 2005; Pyke, C.R. 2005; Weiss, S.B. 1999.) We suggest the SWAP acknowledge the value of grazing, and the ecological co-benefits that rangelands provide to wildlife, when designating grazing as a threat.

We thank the Department of Fish and Wildlife for calling for partnership-based conservation and for thinking holistically about ecosystem management. We strongly encourage the DFW to take advantage of local and regional knowledge in the development of both the regional targets and the Companion Plans and are standing by to help.

Sincerely,



Jenn Fox
Executive Director
Bay Area Open Space Council