

[Commented via e-mail on 12/10/2013]

Dear Mr. Gonzales – Following are the comments of the Alameda County Planning Department on the topic of the State Wildlife Action Plan update for 2015.

Overall, the proposal seems well-thought-out and a good approach, especially considering the budgetary limitations that agencies currently must deal with. Alameda County, despite its reputation as an urban county, has a great deal of lightly developed or undeveloped open space and associated wildlife habitat, including habitat for special-status species, and we welcome ideas for effective management and conservation of these species.

Within the last few years, Alameda County has participated with California Fish and Wildlife Department, the United States Fish and Wildlife Service, and several local incorporated communities in the development of the Eastern Alameda County Conservation Strategy (EACCS), a general blueprint for wildlife and native plant preservation in the face of potential encroaching human activity in Eastern Alameda County. The EACCS identifies a major handful of species that are considered special status species for the region, identifies areas of critical habitat in Alameda County for those species, and presumes that any human activity or development that encroaches upon those habitat areas would need to mitigate its impacts as defined by either the EACCS or a corresponding CEQA document. While not exactly a HCP, as a blueprint document for conservation it contains some of the same elements and concepts. It identifies when and where mitigation for loss of habitat should be considered, and sets minimum standards for mitigation including the location and extent of appropriate mitigation lands. While most agencies have not yet formally adopted the plan, including the County, the USFWS and the CDFW have both begun to consider the plan as the guidebook for habitat conservation in Eastern Alameda County, and County Planning Staff have begun to use the EACCS as the first cut at determining how a prospective developer should have his or her impacts analyzed.

Planning Staff would like to understand how the SWAP will either

- (1) interact with or complement the EACCS,
- (2) supersede the EACCS or
- (3) not interfere with the EACCS and /or HCPs, whichever of those options is appropriate.

In upcoming iterations of your documentation, please include some discussion of this topic.

Thank you for the opportunity to comment. Please contact me if you have any questions or comments on this message.

Bruce Jensen
Alameda County Planning Department
224 West Winton Avenue, Room 111
Hayward, CA 94544