



Mr. Armand Gonzales, Special Advisor
California Department of Fish and Wildlife
1416 Ninth Street, Suite 1342-B
Sacramento, CA, 95814

January 24, 2014

Dear Mr. Gonzales,

The purpose of this letter is to provide you with a set of recommendations from the California Fish Passage Forum (Forum) for the 2015 update of the California State Wildlife Action Plan (SWAP).

As you are aware, the Forum is an association of public, private and government organizations whose mission is to protect and restore listed anadromous salmonid species, and other aquatic organisms, in California, by promoting collaboration among public and private sectors for fish passage improvement projects and programs. Our goal is to restore connectivity of freshwater habitats throughout the historic range of anadromous fish, many of which are currently listed as state or federally threatened and endangered. The Forum was established by the Natural Resources Agency and is now also recognized as a National Fish Habitat Partner.

The Forum seeks to provide you with two sets of comments; several global comments and recommendations relative to the overall structure and content of the 2015 SWAP, and more specific fish passage- and connectivity-related comments and recommendations relative to key concepts the Forum believes is important for teams developing aquatic strategies for each of the hydrologic units within California's ecological sections to incorporate.

I. Global comments

1. **“Fish” and “Wildlife”**—Although it is generally recognized among fish and wildlife professionals that the term “wildlife” encompasses both fish and wildlife species, and the “Vision” for updating the 2005 plan clearly acknowledges the intended audience for the plan is “natural resource managers and practitioners . . .”, the “Vision” also acknowledges that the plan will be “based on science but not written in a scientific or highly technical fashion” and that “an effort will be made to present the issues concisely using common terminology for a general audience.” It can also be assumed, based on the utility of the 2005 plan, that non-agency entities and practitioners will use and reference the 2015 plan in their conservation activities. Creating more opportunities to specifically reference “fish” and “fish and wildlife” in the plan will help to recognize the importance of fish to

California's economy, natural resources, and quality of life for its citizenry and visitors.

- a. **Recommendation:** The Forum believes a unique opportunity exists for the 2015 plan update to discuss California's natural resources using both terms, "fish" and "wildlife" in appropriate places throughout the document, not assuming that all readers and users of the 2015 plan will equate the term "wildlife" with both aquatic and terrestrial species.
2. **Partners and Consortiums**—The "Vision" references, in numerous locations, the importance of partners in implementing the SWAP. Traditionally, partners are often thought of as single organizations or entities. There exists a unique opportunity to highlight the numerous consortiums that exist throughout the State of California, such as the Forum, that bring entities together to advance increasingly complex natural resource issues.
 - a. **Recommendation:** Document and incorporate into the 2015 plan the natural resource consortiums that exist in the State of California that are committed to playing a role in advancing key natural resource issues will acknowledge the work of these groups and ensure ecoregional teams know they exist and can contact them for information, science, and expertise.
 3. **Companion Plans**—The "Vision" notes that "companion plans will be developed for land use management, agriculture, forests and rangelands, water use and management, transportation, tribal lands, and *consumptive* uses." Decades ago, states like Missouri, Arkansas, and Florida championed efforts to shift focus primarily on consumptive species to a shared focus on both consumptive and non-consumptive species, recognizing the economic, social, and recreational benefits non-consumptive users bring to the health of their respective states' financial and natural resources. Since 1995, the US Fish and Wildlife Service has conducted (every five years) national surveys of fishing, hunting, and wildlife-associated recreation. Their 2011 survey revealed:
 - More than 90 million US residents 16 years old and older participated in fish and/or wildlife-related recreation in 2010, expending a total of \$144.7 billion (1 percent of the gross domestic product).
 - 33.1 million people fished (\$41.8 billion)
 - 13.7 million people hunted (\$33.7 billion)
 - 71.8 million people participated in observing, feeding, or photographic fish and other wildlife (\$54.9 billion)

For a more local example, Oregon Sea Grant completed a study in 2011 titled, "Oregon's Non-consumptive Recreational Ocean User Community—Understanding an Ocean Stakeholder." In that document, they describe economic benefits to Oregon from marine mammal viewing, which included transportation, lodging, meals, and other benefits to coastal communities.

Recommendation: Produce companion plans that focus on *both consumptive and non-consumptive* uses, validating the role both sets of activities play in the State of California's economy, natural resources, and quality of life for its citizenry and visitors.

II. **Specific comments related to fish passage and connectivity**

1. **Connectivity Matters**—There are numerous references to connectivity in the 2005 SWAP, however, many of these references are habitat-species specific. Few, if any, references acknowledge the fact that aquatic migration corridors (including riparian corridors) also benefit many terrestrial species. Regional assessments of restoration needs and prioritization related to anadromous fish and their habitats have occurred throughout the Pacific Northwest. Many of these assessments have ranked connectivity as the top priority for strategic regional restoration. These projects have generally had the highest likelihood of success, are cost effective, show immediate results, are long lasting, and can guide where other restoration activities should be implemented based on restored access to larger areas of habitat. Discussing connectivity using more of an ecosystem approach and framework, and ensuring regional teams understand the importance of habitat connectivity as a priority will allow land managers to focus on habitat improvements that benefit all native species associated with those habitats.
 - a. **Recommendations:** Acknowledge the importance of healthy, functional aquatic migration corridors to the many terrestrial species that benefit from their existence by discussing connectivity within an ecosystem framework and approach.

2. **Fish Passage**—Fish passage is recognized as an important objective in several regions in the 2005 SWAP. The Forum offers the following recommendations relative to fish passage objectives in the 2015 SWAP:
 - a. **Recommendation:** Define the highest priority fish passage issues within each of California's coastal regions and watersheds. Define the greatest barriers to fish passage within each region, and key steps that should be taken to address those barriers.

 - b. **Recommendation:** Similar to the acknowledgement of the Passage Assessment Database (PAD) in the 2005 SWAP, acknowledge the use of new tools, such as APASS (Anadromous Fish Passage Optimization Tool, a decision support tool for optimizing barrier mitigation developed by the Forum) that will help the State of California prioritize fish barriers within a watershed, and will help the state make strategic fish barrier investments within and among the highest priority watersheds. Encourage the regions to use tools, such as APASS in their decision making.

c. **Recommendation:** The 2015 SWAP can play an instrumental role in advancing the goals of fish passage in California by asking each of the teams prioritizing strategies for the hydrologic units within the ecoregion boundaries to incorporate the following objectives into the 2015 SWAP:

- Facilitate coordination and communication among agencies and other entities that may propose, review, or promulgate fish passage criteria in California.
- Identify, assess, and prioritize fish passage barriers on public land, and to the extent practical or consistent with landowner goals, private lands.
- Disseminate guidelines and design criteria for replacement of barriers.
- Coordinate funding mechanisms to remove fish passage barriers.
- Promote state and federal permit coordination and streamlining.
- Facilitate plans to monitor and evaluate fish passage restoration effectiveness to ensure accountability.
- Work to promote state and national policy that supports fish passage.
- Implement education and outreach activities, targeting both the general public and fish passage practitioners.

On behalf of the Forum, I want to express our appreciation for the opportunity to provide these comments to you on behalf of the California Fish Passage Forum. If you have any questions, or would like more detailed information, please don't hesitate to contact me at (916) 327-8841, kevin.shaffer@wildlife.ca.gov.

Sincerely,



Kevin Shaffer, Chair
California Fish Passage Forum
A National Fish Habitat Plan Partner

Cc: Michael Bowen, CFPF Vice Chair
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