

[Commented received via e-mail on 10/24/2013]

Please include my comments in the public record.

1. Based on information on the DFW website and the staff presentation (Oct 16, 2013 – San Diego), the overall goals/objectives of the Plan (create a vision for fish and wildlife conservation, account for accomplishments since 2005, update species-at-risk and species of concern lists, identify threats and stressors affecting the planning units, recommend actions that are implementable, measurable and time-bound, etc.) appear to address the federal SWAP requirements.
2. The staff presentation stated that the previous (2005) SWAP identified approximately 800 species of concern, but the 2015 update will identify approximately 380 species of concern. The proposed list of species, and the criteria used to develop that list are not provided on the DFW SWAP website. When will that information be made available and is how would species be added or deleted from the list?
3. The proposed Approach to be used in the SWAP is to develop Conservation Strategies and to identify/implement conservation actions that “eventually” improve the condition of the ecosystem...within and ecoregion, watershed or marine study region. The term “eventually” was described by staff as “within a 10-25 year timeframe.” If the Plan is going to include strategies and actions for implementation over that period, then it should also clearly differentiate which strategies and actions will be instituted in the immediate (presently or within 1-2 years from approval of the Plan), near-term (3-5 years) and long-term (6-10+ years). Because the Plan has to be updated at least every 10 years and, according to DFW staff, also will have a continuous update component, the Plan should clearly identify why any strategies and actions that are not expected to be implemented or have a demonstrable effect during the 10-year time frame of this update are included in the Plan.
4. The basic segregation of the planning units into ecoregions (terrestrial species), hydrological units (aquatic species) and marine study areas (marine species) is reasonable. Parts of the state have implemented NCCP/HCPs that incorporate terrestrial and aquatic habitats and species. How will the SWAP address those areas with implemented NCCP/HP plans? For example, if the SWAP identifies certain vegetation communities or species as important to comport with SWAP goals/directives and that are also addressed in approved plans, will the SWAP defer to the priorities and actions outlined/committed to in those plans? This also has potentially significant bearing on how DFW would prioritize its SWAP projects and funding: would SWAP place greater emphasis on projects/funding in areas with active NCCP/HCP plans or would it consider those areas as having less need for SWAP-based funding?
5. The staff presentation identified “Statewide Strategies” that it has deemed to be consistently important concerns across (most of) the state. The identified statewide strategies are quite varied and represent species groups (anadromous fishes, invertebrates, plants), threats (pollution, invasive species) and administrative/funding concerns (law enforcement). How will the Plan provide guidance at the statewide level and that can be applied at the planning unit level so that each of these can be effectively (and equitably) translated into conservation actions? It isn’t clear how the Plan anticipates these strategies will be implemented in each planning

unit. Are the planning units expected to prioritize projects and funding that directly address problems for which these strategies have direct applicability?

6. The staff presentation also identified a number of “Companion Plans” that appear to focus on certain human-driven activities that affect species and habitats. What is the relationship between the Statewide Strategies and Companion Plans? Will each Companion Plan contain sections that address their relevance of the Statewide Strategies in terms of both positive and negative considerations?

7. For both the Statewide Strategies and Companion Plans, it would help the public to have the tables of contents and some explanatory information provided as soon as possible, so that DFW can receive input – particularly because it is likely that relative importance of some of those strategies and companion activities will vary among the planning units.

8. The Plan must address the variety and number of species of concern/species-at-risk, the incredible heterogeneity of California’s landscape (geologically, topographically, biologically), and the variety and relative importance of “problems” affecting the state’s wildlife. It must also consider the vast number of potential SWAP-oriented activities/responses to address those concerns. Conversely, to be useful, it must be simple enough to allow the public to understand how the Plan will be used/how they can be involved in its implementation as well as provide sufficient clarity to DFW – which will use it as the basis deciding what types of projects and what level funding should be approved under the SWAP program.