

STEWARDS OF THE SEQUOIA

Division of CTUC non profit 501c3
PO Box 1246
Wofford Heights CA 93285

June 11, 2014

California Department of Fish and Wildlife
Habitat Conservation Branch
1416 9th Street
Sacramento, CA 95814

Re: Comment on California State Wildlife Action Plan (*SWAP 2015*)

Dear Planning Staff,

I understand the ten year old California State Wildlife Action Plan (*SWAP*) is due to be revised as required by October 15, 2015 and that your office is seeking public comment on Phase II of this three phase process

As you update *SWAP* there are two important elements which need to be included in the revision which are not included in the Vision document. <http://www.dfg.ca.gov/swap/>

- One is to consider what has worked in the past and what has not worked for conservation of fish and wildlife associated habitats.
Has the *SWAP 2005* plan allowed any species to be removed from the at risk, threatened or endangered species listing? Has the plan reduced the need for species conservation?
Since this is a scientific process it would be important to utilize empirical standards and review the past 10 years or more of procedures to determine if they have worked and eliminate those that have not.
- Another aspect that is not currently considered in the revision is the cost benefit ratio. It would be important to evaluate the cost of implementing *SWAP 2005* over past 10 years, as well as the cost to the public in terms of recreation and tourism revenue gains or losses due to the plan. Then compare this to the value of any benefits produced over the past ten years by the *SWAP 2005* plan, such as the improvement of targeted species status. The cost to benefit ratio numbers will help determine how the *SWAP 2015* plan should allocate resources where they will do the most good instead of revising the plan without general economic or benefit consideration. This would add to the proposed assessment of State Wildlife Grants in the revision process.

Lastly the "Species of Special Concern" currently includes species which are not listed as threatened or endangered by the State. Species conservation is important and this is guided by them being listed as threatened or endangered. "Species of Special Concern" should only include species which have already been listed by the State in order to focus conservation efforts on those species most in need.

Thank you for your consideration and for this opportunity to comment.

Sincerely,

Chris Horgan
Executive Director
Stewards of the Sequoia
Division of CTUC 501c3 non profit
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CC: Congressman Kevin McCarthy
Senator Jean Fuller

"Since being founded in 2004, Stewards of the Sequoia continues to be the largest on-the-ground organization of volunteers in the Sequoia National Forest. Our crews have maintained over 2400 miles of trails and have planted hundreds of trees in reforestation projects. We represent in excess of 2500 members whose activities include camping, hunting, fishing, hiking, mountain biking, motorized recreation, boating, windsurfing, rock climbing and horse riding"

Promoting Responsible Recreation & Environmental Stewardship