

CALIFORNIA FISH AND WILDLIFE
STRATEGIC VISION PROJECT

COMMENTS AND SUBMISSIONS FOR REVIEW

Through March 5, 2012



Cal-IPC

California Invasive Plant Council

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[Affiliations for identification only]

March 5, 2011

Ms. Melissa Miller-Henson, Director
California Fish and Wildlife Strategic Vision Project
The California Natural Resources Agency
1416 Ninth Street
Sacramento, CA 95814

Re: Comments on Interim Strategic Vision

The California Invasive Plant Council (Cal-IPC) congratulates the Fish & Wildlife Vision team on its progress in developing recommendations for a strengthened state infrastructure to protect our natural resources. The amount of collaborative effort in a short period of time is impressive, and the direction of the recommendations is promising.

We would like to submit several comments on the Interim Strategic Vision document at this time. As with our previous comments, our goal is to ensure that the state's natural resources are protected from invasive species.

Invasive species are a top ecological stressor of the state's fish, wildlife, and plant resources and the habitats they depend on. Invasive species interfere with public use and enjoyment of these resources. The Department of Fish & Game cannot fulfill its mission without addressing invasive species as a top priority.

Foundational Strategy

Recommendation #2 promotes active participation in key partnerships. In the accompanying description in Appendix A, several such Integrated Resource Management (IRM) partnerships are mentioned. We suggest adding one that we believe is critical (and which has, like the others, been brought up at Stakeholder Advisory Group meetings): the Invasive Species Council of California (ISCC). In cooperation with its broad advisory committee, the ISCC provides interagency coordination for addressing invasive species in the state. The ISCC is vice-chaired by the Secretary of Natural Resources. It is essential for DFG to take a leadership role in moving the work of the ISCC forward.

Recommendation #3 promotes the use of ecosystem-based management based on credible science. This is the crux of meeting the first two objectives of Goal 2—to “Protect, manage, enhance and restore wildlife resources” and to “Help achieve and maintain healthy ecosystems”. It is an important recommendation, and ideally the description for this section will be fleshed out substantially for the final version.

A core aspect of ecosystem-based management is addressing invasive species. Numerous scientific resources exist on the impacts, ecology and management of invasive species. Extensive work is being done currently to understand how invasive species will affect climate adaptation. Strategic mapping and risk assessment tools have recently been developed to help California effectively address invasive species at the ecoregional level. All of these resources should be leveraged by DFG as part of managing the state's fish, wildlife and plant resources. We suggest adding to the existing implementation action list language such as "DFG and F&GC use the best available scientific analysis and strategic prioritization tools in controlling invasive species that degrade fish and wildlife resources."

Statutes and Regulations

The two recommendations currently in this section relate to organizing and consistently implementing existing statutes and regulations. We feel that there is also a need to review potential needs for new or revised statutes and regulations. For instance, invasive species are not currently defined in Fish & Game code. They should be. (Such definition would need to correspond with existing definitions in Food & Agriculture Code.) This definition would provide a foundation for DFG to develop programs and regulations addressing invasive species.

Permitting

Current recommendations in this section address important aspects of making environmental permitting effective and efficient. It is also important to consider updates to the permitting requirements. The state's Strategic Framework on invasive species, adopted by the ISCC, includes a recommendation (PE-10) that California Environmental Quality Act (CEQA) compliance include invasive species prevention. Some projects that require review under CEQA have potential to spread invasive species into wildland or agricultural areas. Consideration of this potential effect should become a routine part of the CEQA review process, for instance by adding it to the Environmental Checklist Form in Appendix G of the CEQA Guidelines. We suggest including mention of such updates in this section.

Enforcement

Recommendation #3 promotes statutory changes to deter illegal take of wildlife. Similarly, it is important that statute provides adequate means to deter illegal introduction of invasive species. As the presumed intentional introduction of northern pike into Lake Davis illustrates, the impact of such actions can be tremendous, and deterrence needs to be commensurate. We suggest either adding introduction of invasive species to this recommendation, or adding a new parallel recommendation addressing the purposeful introduction of invasive species.

Please contact me if we can provide more information on any of these points. Thank you for the opportunity to comment.

Sincerely,



Doug Johnson
Executive Director
dwjohnson@cal-ipc.org

March 03, 2012

Melissa Miller-Hanson, Director
CA Fish & Wildlife Strategic Vision Process
California Natural Resources Agency

**Interim Draft Review & Phase 3 Workshops – Public Comment – Kirk Vyverberg, citizen
03/03/2012**

The purpose of implementing strategic change is to reset priorities, adjust responsibilities, enhance core strengths, solve defined problems, and adjust to a rapidly changing world. Increasingly challenging conditions indicate the Department of Fish & Game could gain from a continuing supportive relationship with its Stakeholders, the public, and the Commission.

The remaining topic for recommendation development: **Funding, Mandates, Regulations, and the Commission**, deserve recommendations that go beyond the “live with it” standard used to date. **An overarching set of recommendations should be crafted that, if incorporated, would receive significant ongoing support from the Stakeholder groups.** [Think of your past collaborative efforts to pass various bond measures.] For those that do not pledge to raise funds or public support for increased funding sources, than they should support the elimination of mandates benefiting their group. All SAG members should vote and be recorded as part of the recommendations.

Mandates should be prioritized and fully funded. The people of California, as represented by the Stakeholders, should provide the necessary public support to either eliminate or fully fund all mandates through taxes, fees-for-service, or beneficiary payment structures. Reviewing mandates should be an ongoing function of the Department, the Commission and the Stakeholders for recommendations to the Legislature.

Regulations & Permitting should be simplified, integrated, and enforced. DFG should identify conflicting and overlapping mandates, regulations, and permits with other departments of the Natural Resources Agency and with Federal agencies, developing a strategy for resolution and cooperation. Regulatory and permitting costs should be fully covered by fee-for-service or beneficiary payment structures before any enhanced services are recommended [ie. Pre-project conferences, interagency coordination, appeals/arbitration, etc.] On an ongoing basis, the Commission and the Stakeholders should provide a public process for regulatory review.

Funding sources and actions should be identified and prioritized. The standard should be the Stakeholders willingness to politically support these recommendations to a fully funded program position. Permitting should recover all costs on a fee-for-service basis, billing for pre-project meetings, integrated reviews, plan designs and revisions, construction oversight and monitoring. Licenses and passes should support all DFG

lands. Beneficiary and use payments in the form of mitigation and royalties [land development, in-stream gravel mining, commercial fishing, water use, etc.] should provide for habitat banking and enhancement, fish passage, and wildlife water purchases. A Wildlife Conservation tax should be developed to support habitat and conservation planning and marketed as “1% for Wild California”. Oversight and public review of the mandate funding should be provided by the Commission and the Stakeholders on a continuing basis.

The Commission should remain the public face of the new Department of Fish & Wildlife, providing a process of citizen oversight and support. Commissioners should be of the quality of members of the BRCC and the Stakeholders should provide members for standing committees. This would create an increased structure for a public-private partnership providing oversight, input, and support to the Department’s mission and mandates. However, to establish clear accountability, all authority required to fulfill mandates, set regulations, and establish policy should reside in the Department.

The Commission represents the citizens and as such should represent diversity, integrity, and a variety of stakeholder interests, integrated with a strong natural resource management stewardship ethic. They require sound judgment and wisdom for oversight, plus an ability to build community and government support for the mandates and programs of the Department. The name change is good if affordable.

DFG Commission: Mission Suggestion 3 - A compilation

The mission of the California Fish and Game [Wildlife] Commission, on behalf of our citizens, is to ensure the long term sustainability and vitality of California’s diverse wildlife resources by overseeing the Department of Fish & Game [Wildlife] and marshalling support for its public trust mandate and programs.

DF&G Commission: Vision Suggestion 9

The vision of the California Fish & Game Commission, in partnership with the Department of Fish and Game and the public, is to fulfill its mission by:

- Establishing communication and partnerships between stakeholders, communities, and the Department that informs and supports DFG’s public trust mandates*
- Informing California’s fish and wildlife resource management policies, regulations, and legislated mandates through a process of public review and support*
- Providing oversight to insure transparency, fiscal responsibility, and fairness in the establishment of fees and management of funding sources*

Kirk Vyverberg, citizen



February 28, 2012

California Fish and Wildlife Strategic Vision Project

Attn: Hon. Blue Ribbon Citizen Commission and Stakeholder Advisory Group Members

California Natural Resources Agency

1416 Ninth Street, Suite 1311

Sacramento, CA 95814

Dear Commission Members and Stakeholders:

At the February 16, 2012 Fish and Wildlife Strategic Vision Executive Committee meeting, I announced the Department of Fish and Game's (Department) upcoming strategic planning effort. As promised, I'd like to provide you with additional detail on how that process will dovetail with and add to the Strategic Vision efforts of the Stakeholders and Commission members. I'd also like to reiterate the Department's commitment to hearing from our stakeholders and furthering our understanding of the California population we serve during our strategic planning process. Let me start, however, with a heart-felt thank you for all of your hard work and time spent focusing on the Department's future. We appreciate very much that work.

The Executive Committee adopted virtually all of the recommendations the Stakeholders and Commission members jointly proposed, covering a broad array of topics from vision level suggestions for core values to specific ways to coordinate permitting programs. I understand the list of issues on the table for your discussions was much broader than just those recommendations ready for our consideration on February 16th. Consistent with Secretary Laird's comments, those remaining items will not go away, but instead many will become topics for the Department to address in its strategic planning process, which we anticipate launching this spring. Further, those recommendations that are more appropriate for you to consider in a "next phase" of the vision process than for the Department to consider are identified below and will be part of your discussions over the next month.

There are several topics the Department will not address and that we ask be addressed by the Stakeholder Advisory Group and Blue Ribbon Citizen Commission in the coming weeks. These topics include matters related to the role of the Fish and Game Commission, alternative funding sources for the Department and the Fish and Game Commission and decisions on the level of Stakeholder and Commissioner support for improving our fiscal outlook by either removing obsolete and underfunded mandates, or, in the case of underfunded mandates, better matching the cost of services and the fees that support them. You can expect to hear more on this topic from Chief Deputy Director, Kevin Hunting, at your March 1, 2012 meeting. Finally, upcoming discussions regarding legislation would benefit from any additional suggestions you can provide for statutory or regulatory changes.

In many ways, your efforts as part of the Fish and Wildlife Strategic Vision Project have made my job of planning for the Department's future much easier. We have a head start on understanding many of your concerns, suggestions from our own employees and ideas for how to address the challenges we face. Thank you for the many hours you have dedicated to this process and please look forward to hearing more from me about participating in the Department's strategic planning efforts coming later this spring.

Sincerely,

A handwritten signature in black ink, appearing to read 'CHB', with a long horizontal line extending to the right.

Charlton H. Bonham
Director

cc: Kevin Hunting
Chief Deputy Director

Melissa Miller Henson,
California Fish and Wildlife Strategic Vision Project Director