CALIFORNIA FISH AND WILDLIFE
STRATEGIC VISION PROJECT

COMMENTS AND SUBMISSIONS FOR REVIEW

Through March 12, 2012
Mr. Clark Blanchard  
California Fish and Wildlife Strategic Vision Project  
California Natural Resources Agency  
1416 Ninth Street, Suite 1311  
Sacramento, CA 95814  

March 12, 2012

RE: Comments on Interim Strategic Vision

Dear Mr. Blanchard,

I am writing on behalf of Solano Resource Conservation District to express strong support for several of the recommendations proposed by the Interim Strategic Vision: Recommendations for the California Department of Fish and Game and the California Fish and Game Commission. In particular we support Permitting Recommendation #3: Removing permitting barriers to restoration projects and Permitting Recommendation #4: Developing a set of criteria and implementation guidelines for “beneficial” projects.

As a Resource Conservation District, we often work on small restoration projects with private landowners. In the past couple years, we have had to walk away from several key projects that would have had very beneficial environmental benefits because of overwhelming obstacles due to environmental permitting. These obstacles would be greatly reduced if there was a restoration-oriented Streambed Alteration Agreement process that was substantially different than that required for extractive industries such as gravel mining – particularly in terms of reduced fees, a simpler, more straight-forward application process, and shorter time period for processing permits. We are also supportive of the proposed statutory exemption under CEQA for small scale restoration projects as they relate to special status species.

Feel free to contact me at 707-678-1655 x119 if you would like to discuss our comments in more detail.

Sincerely,

Chris Rose  
Executive Director

cc: Wendy Rash, District Conservationist, NRCS Dixon Office
You place an emphasis on partnerships, and the Mission Statements state:

California Fish and Game Commission:

*Building active fish and wildlife resource management partnerships with individual landowners, the public and interest groups, and federal, state and local resource management agencies.*

California Department of Fish and Game:

*…manage California’s diverse fish, wildlife, and plant resources, and the habitats upon which they depend, for their ecological values and for their use and enjoyment by the public.*

The Commission extends this partnership for government agencies and the Department to the public. The government relationships might result in Memorandums of Understanding MOU or Joint Powers Authority JPA which create a subset government without the structure in place for oversight nor the funding in place for administration and continuity.

Though the overall trend is for Public Private Partnerships, there remains an aspect of accountability, conflicts of interest and economic interests.

Funding mechanisms are not addressed during period of declining revenues and budget reductions.

The Vision Statements state:

California Fish and Game Commission:

*... in partnership with the Department of Fish and Game and the public, is to assure California has sustainable fish and wildlife resources.*

California Department of Fish and Game:

- *acts to anticipate the future;*
- *approaches management of our wildlife resources on an ecosystem basis;*
- *bases its resource management decisions on sound biological information and a clear understanding of the desires of the public;*
- *is based on teamwork and an open and honest internal communication;*
- *empowers its employees to make most of the “how” decisions;*
- *is committed to extensive external communication and education programs;*
• creates and promotes partnerships; coalitions of agencies, groups, or individuals; and any other collaborative efforts to meet the needs and management of wildlife resources.

Your partner is the public and the recognition of ecosystem management. With that, the expertise needs to be addressed as to priority. The partnerships with government agencies may be more of a stewardship role that an equal role. That regional aspect is may only come from those with mutual understanding as stated:

**federal, state and local resource management agencies.**

The responsibilities of a partner is equal to that of the agency.

You also state:

*DFG/F&GC use “ecosystem-based” management 3 informed by credible science. When scientific or technological information is considered in decisions, the information should be subject to well-established scientific protocols, including peer review where appropriate.*

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*Ecosystem-based management is defined as an environmental management approach that recognizes the full array of interactions within an ecosystem, including humans, rather than considering single issues, species, ecosystem services in isolation* (Christensen et al. 1996, McLeod et al. 2005).

The science needs to be documented and accessible to the public. Natural Resources Agency has created Cal-Adapt. How do the Commission and the Department fit into this tool for the public and local government use.

Also consider aspects of weather, National Oceanic and Atmospheric Agency NOAA and the US Geological Survey USGS.

You are missing that Local Governmental agencies may not have any expertise in this arena and can make decisions detrimental to the ecosystem. Recognize there is an existing failure of oversight on issues of permits and quarantines. Public Health is the recognized term for local governments and you are not clearing identified with that aspect.

The Governor’s Office of Planning and Research is addressing Adaptive Management Strategy and so should you.

You need to accept an oversight role on projects and budget for that oversight. This is your current failure now i.e. City of Los Angeles, Proposition O Echo Park Rehabilitation Project removal of fish and turtles without permits or quarantine. Burdens of oversight are placed on the shoulders of knowledgeable public members without cooperation of the general public or the city.
Water and hydrology are missing from this discussion and those aspects of public education and agency partnership are critical.

Urban areas as they adapt to Climate Change, Sea-Level Rise, and Greening need to be adapted to the science and the ecosystem.

We caution changes to CEQA without addressing Mitigation and Monitoring execution and oversight. Documents are prepared without the follow-through of execution.

Categorical Exemptions are not always the way for project execution. Streamlined Permitting is not always the way for project execution. Notification should be a priority. Consider due process as a Constitutional issue.

Public Health and Safety also needs to be addressed under Fish and Game Wardens and their duties as Public Health and Safety Officials.

Joyce Dillard  
Los Angeles, CA
Comment regarding the Strategic Vision report: I think that the names of DFG and the Commission should be changed from “Game” to “Wildlife”.

Thanks-
Kim Fettke
Loomis, CA
To: California Fish and Wildlife Strategic Vision Executive Committee  
   Attn: John Laird, Chairman

Date: March 12, 2012

Subject: Public Comment on the California Interim Strategic Vision

The Colusa County Fish & Game Advisory Committee would like to thank your Executive Committee for spearheading this important process to “…help create a more effective and functional department and commission…”. The Colusa County Commission is made up of stakeholders from different areas of the County. The stakeholders consist of landowners, business owners & public service employees all of whom volunteer their time and experiences.

After studying the Draft Interim Strategic Vision and the current Interim Strategic vision the Colusa commission unanimously agreed to submit one suggestion. The suggestion is on the premise that the current structure of the Department and State Commission keeps them removed too far from the resources they are hired/appointed to protect. For these organizations to “…more effectively fulfill their public trust missions in the future.” they must have direct and first hand knowledge about the wildlife and habitat in California.

The Colusa County Commission Suggests that the State be divided up into five regions. All of the counties with an advisory Fish & Game Commission within each region should nominate at least two persons from their region for one to be appointed to the State Commission. This will provide a chance for the public to have a true “grass roots” approach to the process with transparency and collaboration. Much like the structure of your SAG, the state commission will have someone from the ground floor with knowledge of specific issues coupled with guidance from the Department. “Sound Science” is a common phrase used at the State meetings. Science has its place, but nothing can replace time and experience in the field.

Respectfully Submitted,  
Colusa County Fish & Game Advisory Commission

Holly Gallagher  
Secretary

Cc: Jim Nielsen, Assemblyman  
    Doug La Malfa, Senator  
    Colusa County Board of Supervisors
As CA F & G Commissioner, Richards should show support of CA law while in other states thereby encouraging other states to follow.

DFG represents the less than 1% that hunts, not the 99+% that don't. We are the 99%!

Dan Richards doesn't represent the 99%. His mountain lion mess shows how out of touch he is with the vast majority of Californians. Why doesn't the Commission reflect the state?

The department name needs to be changed to Dept. of Fish and Wildlife. (not Game)

Sheila Steinberg  
Meadow Vista, CA
-----Original Message-----
From: Sharon Clevesy
Sent: Friday, March 09, 2012 10:21 PM
To: Strategic Vision
Subject: Dept. of Fish and Game

A Department of Fish and Wildlife (instead of Game) would be much more representative of the majority of Californians who don't hunt and who love the natural beauty of our state.

Sharon Clevesy
Auburn, CA
Hello,

The recent conflict over the killing of a beautiful mountain shows where the DFG's priorities are. DFG does not represent the majority of Californians - only 1% are hunters - DFG needs to represent the opinions of the 99% who greatly value our amazing wildlife. Mr. Richards has proven that he's not capable of protecting wildlife and protecting Californians right to enjoy the bounty of Mother Nature.

Fire Mr. Richards and rename the DFG to Dept. of Fish and Wildlife!

Thank you.

Irene Smith
I've been following the vision process, and see much about which to be hopeful. However, the glaring flaw is that the less than 1% of Californians who hunt still have a stranglehold on our state wildlife agency. Goal 2 item 2: "Promote and support outdoor recreation, hunting, and fishing". Why are consumptive uses still singled out for special attention? That does not reflect California in any way.

AB 2376 requires "reforms necessary to take on the challenges of the 21st century". There is absolutely no way to do that without drastically changing the core management to reflect California. That means changing employees and the F&G Commission. Firing Dan Richards would be a great first step. His cougar debacle points out the dysfunction in our one agency mandated to protect wildlife. You cannot have a commission made up solely of hunters and fisherman and hope to ever create lasting change.

So the big question - where are the 99% in DFG? When will we be represented in fair proportion?

Kris Lewis
Rocklin CA
Melissa,

Please find attached the RCRC comment letter on the Interim Strategic Vision. Could you please see that the members of the Executive Committee and BRCC receive a copy. Many thanks.

Cheers,

Nick Konovaloff
Regional Council of Rural Counties
1215 K Street, Suite 1650
Sacramento, CA 95814
Ph. (916) 447-4806
FAX (916) 431-0101
February 29, 2012

Melissa Miller-Henson, Director
California Fish and Wildlife Strategic Vision
1416 Ninth Street, Suite 1311
Sacramento, CA 95814

RE: California Fish and Wildlife Interim Strategic Vision

Dear Ms Henson,

On behalf of the thirty-one member counties of the Regional Council of Rural Counties (RCRC), we are pleased to provide a few brief comments regarding the California Fish and Wildlife Interim Strategic Vision Report (Report) from the perspective of rural local government.

RCRC appreciates the efforts and hard work of the Executive Committee, Blue Ribbon Citizen Commission (BRCC) and the Stakeholder Advisory Group (SAG) as well as staff given the enormity of the task as outlined in AB 2376 by Assembly Member Huffman (Chapter 424, Statutes of 2010).

RCRC continues to have concerns with the abbreviated time frame in which the California Fish and Wildlife Strategic Vision is to be completed. The sheer number of SAG workgroup meetings in addition to those of the Executive Committee and the BRCC has made it extremely difficult for full participation among the stakeholders.

The majority of the remaining comments will focus on the Report adopted February 16, 2012 by the Executive Committee.

Core Values
RCRC supports the suggested five statements of core values for the Department of Fish and Game (DFG) as well as the Fish and Game Commission (Commission) including stewardship, integrity, excellence, teamwork and partnership, and innovation.

Statements of Foundational Strategies
RCRC supports the four statements of foundational strategies for DFG and the Commission including internal and external communication, utilization of both formal and informal partnerships, the use of credible science and a transparent decision-making process.
**Overarching Goals and Objectives**

**Goal 1: Strong Relationships with Other Agencies, Organizations and the Public**

RCRC supports Goal 1; however, RCRC strongly believes that local government should be specifically referenced in the goal. Local government is often an integral partner with numerous state and federal agencies. For example, many RCRC member counties have substantial lands within their county boundaries that are publicly owned by both the state and federal government which includes DFG wildlife refuge areas.

**Goal 2: Highly Valued Programs and Quality Services**

RCRC supports Goal 2. RCRC appreciates that the promotion and support of public outdoor recreation including hunting and fishing as well as the protection, management, enhancement and restoration of wildlife are stated within the goal.

Tourism is a major component of the economy in RCRC member counties. Many rural counties are home to California’s great natural resources which provide ample opportunity for a variety of outdoor recreational opportunities.

**Goal 3: An Effective Organization**

RCRC supports Goal 3. RCRC also appreciates that the coordination of resource planning, policies, practices, process and regulations with other agencies and organizations and statewide within DFG is stated within the goal. RCRC believes this will assist in significantly reducing the duplication of effort among the interested parties.

**Goal 4: An Efficient Organization**

RCRC supports Goal 4. RCRC appreciates that the management of capacity and resources is stated within the goal. RCRC believes that during these fiscally constrained times at the local, state and federal level that the management and judicious use of resources is critical.

**Recommendations to Help Achieve Goals and Objectives**

RCRC is generally supportive of the recommendations which were adopted by the Blue Ribbon Citizen Commission on February 6, 2012 and will only mention a couple at this time.

RCRC appreciates the recommendation to ensure the successful recruitment and retention of fish and game wardens. The current staffing of game wardens is woefully inadequate to address the needs in California. Additionally, the lack of adequate staffing places a heavy burden on local law enforcement that is already strained to serve the needs of its local community particularly during these difficult economic times.

RCRC supports the recommendations within the permitting section which includes many policies which RCRC has long supported in order to establish a more efficient and effective process.
**Conclusion**
RCRC looks forward to remaining engaged in the next phase as the Executive Committee, BRCC, SAG and other stakeholders develop a final report with additional recommendations to address long-term issues that face DFG and the Commission.

RCRC understands from comments by Charles Bonham, DFG Director that the Department is at the very initial phase of preparing a long-term strategic plan for the Department and that some unresolved issues and those better suited to the internal operations of the Department will be moved into the strategic plan.

While it was not addressed in the Interim Strategic Vision RCRC believes it is important to address the payment in lieu of taxes (PILT) program at this juncture in the process. The failure of the Department to meet their in lieu fee obligation to counties pursuant to California Fish and Game Code Section 1504 remains a major concern. This section specifies that when income is derived directly from real property acquired and operated by the State as wildlife management areas, the Department shall pay annually to the county in which the property is located an amount equal to the county taxes levied upon the property at the time title to the property was transferred to the state.

The in lieu fees are intended to offset adverse impacts on county property tax revenue that result when the State acquires private property for wildlife management areas. It is our understanding the Department is currently in arrears of over $19 million.

This shortfall in funding from the Department to the counties has lead to frustration at the local level, where county officials continue to bear the burden of providing mandated services to public lands that are not subject to local property tax. We are concerned that any further lapse in the payment of the in lieu fees will further exacerbate dissatisfaction with the State’s land acquisition policies.

As stated in the preceding comments, RCRC is generally supportive of the framework and contents of the Interim Strategic Vision but will closely review and engage as needed on the merits of any legislative proposals that emerge as a result of the Interim Strategic Vision.

Sincerely,

Nick Konovaloff
Legislative Analyst

cc: Members, Executive Committee
Members, BRCC
The Honorable Jared Huffman, California State Assembly Member