

July 31, 2019

Members of the Wildlife Conservation Board  
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Dear Board Members:

Thanks for the opportunity to comment on the proposed strategic plan update. I greatly appreciate that the strategic plan update is being reviewed and that public input is being solicited. I also want to commend your engagement of Kevin Hunting to lead this review, as he has great experience and perspective to apply to the task at hand. For any members of the Board that I haven't met, I am the chairman of Mendocino Redwood Co LLC and Humboldt Redwood Co LLC, and we oversee 440,000 acres of redwood and Douglas fir forestlands that are certified by the Forest Stewardship Council. Our forest management policies include harvesting less than growth, the elimination of traditional clear cutting, protection of all old growth down to the level of individual trees, an extensive aquatic habitat restoration program, and open transparent operation with all relevant info on our management available on the web ([www.mrc.com](http://www.mrc.com) and [www.hrllc.com](http://www.hrllc.com)).

I have been sharing observations and advocating for action on various WCB matters for close to ten years. As I have said in the past and want to reiterate again, I support the mission of the WCB... I think the mission is both noble and remains a great example of trying to live our shared values of protecting the wonderful environment we have in California. I also think there remains lots of ways that the WCB could be better.

It is noteworthy for an agency that has spent \$3 billion over its history, and has hundreds of millions left to spend, that only 85 members of the public could fully complete the survey on the strategic plan update. I am sure that many of the survey respondents also included conservation partners who functionally act at least in part as agents for getting transactions done. These two factors, limited public engagement and heavy reliance on agents with their own self-interest, creates an additional burden on the Board to make sure the WCB has a clear road map for the many dollars that it will dispense.

The originally adopted strategic plan contains lots of pleasing aspirations. Invest in projects that support climate resiliency, or build wildlife corridors, or improve stream flows etc... these aspirations are nice and also in general non-exclusive and of very little value in knowing how the WCB actually sorts out competing demands for scarce project dollars. I challenge a board

member to look at the 2014 strategic plan and explain how it prioritizes one project over another. With so many pleasing aspirations, it is always possible to fit a project into one or more of the many boxes designated as of interest to the WCB. The most important foundation of the original strategic plan was investing in the conservation priorities of the state. The only problem is the conservation priorities of the state were never defined with specificity, leaving the nice sounding framework subject to interpretation each time a project appears before the board.

Various goals were subsequently adopted to map onto these conservation priorities, however the WCB decided to measure progress against the goals based on number of projects completed as opposed to acres conserved or dollars expended, resulting in the bizarre outcome that a 10,000-acre project and a 1-acre project could receive the same weighting in the satisfaction of goals.

California is made up of about 100 million acres. About 50 million acres are already in federal and state and local government ownership. With an ever increasing population and the effects of climate change appearing more ever rapidly, the conservation needs of the state will always exceed the resources of an agency like the WCB. With more projects than dollars, an absence of clear identifiable prioritization will result in the WCB either 1) just reacting and buying what comes for sale that sounds good in the moment, or 2) staff making prioritization choices in private out of sight from the general public. After all, when was the last time that the WCB voted down a project, or weighed three competing proposals with a vote to only take the single best of the three?

I found the first 20 pages of the Strategic Plan Update to be a helpful and well organized summary of a lot of background that is relevant to the function of the WCB. Here are additional some comments:

Page 1 of the Strategic Plan Update talks about how “WCB projects and programs maximize return on taxpayer investment in conservation and wildlife oriented recreation....” Given the absence of transparency in purchases (appraisals are intentionally withheld from public view) and the lack of substantive metrics towards well defined goals, this remains a bold statement.

There is an interesting conflict in the draft – the first page cites 1.5 million n acres conserved over time, but the projects that can be categorized for the type of benefit provided to selected habitat only add up to 830,000 acres (see page 14). Ideally a strategic plan would first assess what has worked well in the past and what mistakes have been made, so that the successes could be used as models for future activities, and identified mistakes could avoid being repeated. Since close to half of the acres that the WCB has conserved can’t be easily

categorized for what habitat they benefit, it makes me think more could be done to assess the success (and mistakes) of the past. It might be useful to consider a review of projects even from the last 20 years for a future strategic plan.... Similarly, as an aside and in the category of measuring past results, I note from the WCB website that annual reports appear to only be produced episodically (it looks like they are missing for 2009, 2010, 2011, 2013, 2014 and 2017).

The bulk of my feedback remains my strong suggestion to bring greater definition to the conservation priorities of the State that will be relied upon by the WCB for their spending. I applaud the spirit of the specific goals in section 4, but by my count section 4 suggests the following:

1. strong encouragement to complete 168 specific projects (generally with no dollar or acreage measurements specified) – SI 1, SI 2, SI 3, SI 4, SI 5.1
2. numerous organization and outreach goals – SI 5.2 – SI 5.4, SI 6, AND
3. the aspiration of more definition around what are the conservation priorities of the state for the WCB – SI 6.3, SI 7.5

I applaud the specificity of project goals suggested in the strategic plan update contained in section 4. The project goals are clear and measurable. With that said, I fear that many of the goals in 1 and 2 above will consume the staff of the WCB, while the most important [and challenging] work associated with a strategic plan [SI 6.3 and SI 7.5], the actual definition of conservation priorities of the state for the WCB, will be deferred while people check off the easier and discrete tasks laid out in the projects and organizational/outreach goals suggested.

Toward the end of the 2014 strategic plan discussion an idea was formed about tying the conservation priorities of the state to the DFW SWAP. I was very intrigued with the idea of looking at threatened habitat as identified by the SWAP and mapping that against acres in public and private ownership, and seeking to add to those areas where public ownership is under-represented. That is the sort of conservation priorities process that could substantially improve the effectiveness of WCB investments. It might be that two or three existing studies could be relied on (e.g. the SWAP, the California Water Action Plan, the California Essential Connectivity Assessment...), but a key is to be clear on one set of objective criteria to establish prioritization by area, and to have these prioritizations be clearly identifiable and measurable for the public.

A last comment is the need to measure the success of the WCB in meeting its goals on something other than projects completed. Projects completed was adopted for the last

strategic plan as the measuring stick for meeting various general goals, even though that results in a project of ten acres and 10,000 acres receiving the same credit for the WCB.

For most of the ten years I have been engaged with the WCB projects have come through that sound positive. But clear prioritization and especially substantive measurable goals remains elusive. I urge the board to direct the staff to define the conservation priorities that guide their effort and expenditures and to develop metrics against these specific priorities. The conservation priorities should be something that could be explained to the public on two or three pieces of paper at the max. The staff does not have to invent the conservation priorities

for the state – they could come up with understandable concise interpretations of the SWAP, the California Water Action Plan, the California Essential Connectivity Assessment and so on to be clear what the WCB is trying to accomplish and how it will prioritize the excess of projects available relative to its resources. Conservation priorities should be understandable to laypersons, weighed in relation to how much of a given desired habitat is already in government hands vs remaining in private hands, and weighed in light of the role restoration can play as compared to additional public ownership. Finally, with enough specificity on conservation priorities, the WCB could issue actual requests for proposals for specific kinds of projects, likely increasing the supply of the best sorts of projects to select from.

I believe the strategic plan could be of much greater utility if clearer priorities can be developed and articulated. As always thanks for the chance to share these views.

Best Regards,



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