2015 STATE WILDLIFE ACTION PLAN

Summary of responses to comments received during the public comment period
(August 11-September 11, 2015)

COMMENTS RECEIVED

We received 21 comments by email from external reviewers. Eleven were in support of adding Great Blue Heron, eight recommended a number of other species be added to Species of Greatest Conservation Need (SGCN); listed below), and the remainder raised a small number of other issues. For questions, more information, or the full text of comments received, please contact Penny Becker at penny.becker@dfw.wa.gov.

RESPONSE

Each of the comments and Washington Department of Fish and Wildlife (WDFW) responses are briefly summarized below. Comments are organized by the chapter they most closely correspond to. Where appropriate, we have referenced the page number where specific edits to the public review draft can be found.

Chapter 2 – State Overview

COMMENT	RESPONSE
Acknowledge recent habitat acquisitions	Information on recent habitat acquisitions and descriptions of two additional collaborative projects (Puget Sound Nearshore Ecosystem Restoration Project and the I-90 Snoqualmie Pass Project) were added to Chapter 2 (See pages 2-16, 2-24, and 2-26).
Include additional collaborative projects	

Chapter 3 – Species of Greatest Conservation Need

COMMENT	RESPONSE
Add a generic "**local native pollinator complex**" to cover the conservation needs of Washington State's approximately 600 species of native bees and other declining native pollinators.	We added text in the SGCN chapter (page 3-40) to emphasize the importance of this group of species and we outlined challenges to their conservation. We also edited the methodology and criteria section in Chapter 3 to clarify that we need data to be able to confirm that the species is in need of conservation – lack of information alone does not qualify a species as an SGCN. While State Wildlife Grants may not be utilized to fund the work requested by the commenter, WDFW will continue to work with our partners and to utilize other funds (such as Watchable Wildlife License Plate funds) as possible to bring attention to our state's important pollinators.
Combine Priority Habitats and Species (PHS) and SGCN lists.	We evaluated the option of combining these lists early in the SWAP development process and determined that each program serves unique purposes, and is oriented towards different audiences. Combining the lists would dilute the effectiveness of each and ultimately cause more confusion. WDFW will work to better clarify the purpose and functions of these lists for internal and external users.
Terminology confusing – eliminate "species of concern".	WDFW will evaluate the benefits of retaining this term as we move forward with implementation of the SWAP.

Chapter 3 – Species of Greatest Conservation Need: recommendations for adding specific species to the list.

While we greatly appreciate the comments and data provided by all emails received, we have not changed the SGCN list as published in the SWAP Public Review Draft at this time. We reviewed the current status and data available for each of the species noted below and determined that in each case there was no compelling indication of region-wide decline. Please see Chapter 3 of the final SWAP for the criteria used to assess which species should be on the SGCN list. We also note for reviewers that federal guidance allows WDFW to add a species to the SGCN list within the next ten years, if new data or evidence of declines becomes available. We will periodically assess the status of species and recommended new additions if necessary. Please note that the comments have been summarized in the table below.

Species	Rationale for not adding this species to the SGCN list at this time.
Acorn Woodpecker *Although newer to WA, it is still in need of conservation because of the overall decline in oak woodland habitat and its slow reproduction rate.*	This species was not included on the SGCN list because it is at the periphery of its range, and has recently expanded its range north into Washington. We do not have information as to why the species has expanded into Washington.
Black-backed Woodpecker *This species is highly dependent on conservation restrictions -- essentially unknown away from recent burned forests, it exists only where burned snags are projected from salvage logging.*	It seems likely that this species exhibits both functional and numerical responses to forest fires. As a result, the population likely changes in space and time at multiple spatial scales. The most productive areas are recent burned forests and when those areas are no longer suitable the species again responds (we assume) both functionally and numerically. When recently burned forests are no longer present in a particular landscape or are insufficiently large at least some of these woodpeckers move back to the closed-canopy forest. We are fully aware of research indicating that the species uses recently burned forests and that salvage harvest modifies habitat. We are unaware, however, of any data indicating that the species is experiencing a long-term population decline. This is currently a PHS species, and therefore WDFW has developed management recommendations for local governments, conservation groups and others to utilize for its continued conservation.
Ten native bumblebees White-shouldered bumble bee, *Bombus appositus* High country bumble bee, California bumble bee, *Bombus californicus (fervidus)* Yellow bumble Bee, *Bombus fervidus* Obscure bumble bee, *Bombus calignosus* Fernald cuckoo bumble bee, *Bombus fernaldae* Frigid bumble bee, *Bombus frigidus* Indiscriminate cuckoo bumble bee, *Bombus insularis* Forest bumble bee,	There *are* many native bee species, and unfortunately, like many insects, we know little regarding their distribution and abundance, or trends of either. Our SGCN assessment process consisted of evaluating NatureServe designated G1, G2, S1 and S2 species, and state and federally listed taxa, which included only one or two bees. We also used additional resources as available for SGCN assessments. For our assessments of bees, we relied heavily on data that did exist; the recent *IUCN Assessments for North American Bombus spp. (Bombus* genus includes all bumble bees), and phone discussion with the lead author of the document, Rich Hatfield, with The Xerces Society for Invertebrate Conservation. All *Bombus* occurring in WA categorized by IUCN as Vulnerable or at a higher level of endangerment were added to SGCN list, unless there were significant questions regarding status presented in the analysis or justification notes. IUCN assessments categorized the three bumble bee SGCN as Vulnerable (Western and Morrison's Bumble Bees) and Critically Endangered (Suckley Cuckoo Bumble Bee). Two species recommended by this commenter were also categorized Vulnerable (California and Obscure Bumble Bees), but had significant questions presented in the report regarding data confidence or other assessment values.

Species	Rationale for not adding this species to the SGCN list at this time.
Bombus sylvicola Half-black bumble bee, *Bombus vagans* Van Dyke's bumble bee, *Bombus vandykei*	Of the other eight species recommended for SGCN status by this comment, seven were categorized by IUCN as Least Concern, and one as Data Deficient.
Cascades Frog *Should be added because the USFWS has issued a 90-day finding that determined consideration for listing under the ESA was warranted.*	We know of no data indicating region wide, long-term population declines of Cascades Frogs. Cascades Frog depend on high elevation wetlands for breeding, and are potentially at risk from climate change - population status should be assessed over time.
Cassin's Auklet *Data not sufficient to remove.*	We have no information to indicate this species has experienced a population decline. Many seabirds are susceptible to changes in their food supply in response to changes in oceanic conditions. This can result in dynamic changes in species abundance. This is currently a PHS species, and therefore WDFW has developed management recommendations for local governments, conservation groups and others to utilize for its continued conservation.
Common Murre *Data not sufficient to remove.*	We have no information to indicate this species has experienced a population decline. Many seabirds are susceptible to changes in their food supply in response to changes in oceanic conditions. This can result in dynamic changes in species abundance. This is currently a PHS species, and therefore WDFW has developed management recommendations for local governments, conservation groups and others to utilize for its continued conservation.
Great Blue Heron *WDFW does not separately list the disappearing Pacific Great Blue Heron, the fannini subspecies found only in the Salish Sea, from the herodias subspecies found throughout our state. In 1976 there were ten nesting colonies of fannini in Thurston County. At last counting, in 2009, there were only five.*	The subspecies *fannini* is found throughout the "coastal" areas of western Washington (not just in the Salish Sea) and extends to Alaska. We are not aware of evidence that any populations within western Washington have declined. The 9,000 individuals in the Greater Puget Sound area in 2006 (as mentioned in one comment letter) does not appear to us to be a small number. Without a newer estimate showing a decline, this doesn't represent a significant concern. Some colonies do exist close to populated areas and seem to do well as long as human disturbance doesn't become excessive. Also, we note that the SWAP SGCN list focused on statewide or region-wide population status and trends, not county by county. This is currently a PHS species, and therefore WDFW has developed management recommendations for local governments, conservation groups and others to utilize for its continued conservation.
Harbor Porpoise *The harbor porpoise should be included in protective management until it is certain that its population is stable or increasing.*	Two sources indicate that harbor porpoises have been on the increase in the Washington portion of the Salish Sea over the last 15 to 20 years and that the species may now be at historically high population levels. These sources include one WDFW biologist that annually surveys the Salish Sea (Evenson) and Cascadia Research Cooperative (Calambokidis). Both data sets seem to show a very noticeable increasing trend in harbor porpoises since the 1990s. This is currently a PHS species, and therefore WDFW has developed management recommendations for local governments, conservation groups and others to utilize for its continued conservation.

Species	Rationale for not adding this species to the SGCN list at this time.
Pileated Woodpecker *At risk because it requires large, decayed snags for nesting and roosting.*	Breeding Bird Survey data indicate slight increases in Washington for both time periods reported (1966-2013 and 2003-2013). Confidence intervals for both time periods indicate that trends were not distinguishable from stability. Trends for the Northern Pacific Rainforest (BCR 5) were slightly down for both periods, and again the confidence intervals were not distinguishable from stability. This is currently a PHS species, and therefore WDFW has developed management recommendations for local governments, conservation groups and others to utilize for its continued conservation.
Vaux's Swift *Specifically regarding Vaux's swift, there is widespread evidence from numerous sources (e.g., BBS data; Bull 2003) that this species has been in decline in the northwest for some time.*	Breeding Bird Survey data indicate slight declines in Washington, British Columbia and the Northern Pacific Rainforest (BCR 5); however, all trends had confidence intervals indicating that trends were not distinguishable from stability. The trend for Oregon was a slight increase. We are aware of no monitoring data that rigorously demonstrates a population decline in this species in Washington. The trend in habitat loss in Washington since European settlement is acknowledged; most of that loss occurred prior to the beginning of the Breeding Bird Survey period, and trend in habitat loss is now much less. Although this was not a reason for not including Vaux's Swift as a SGCN, it is noteworthy that forests in lower and mid-elevation areas in Washington (e.g. nonfederal lands in the Puget Lowlands and southwestern Washington) will almost certainly improve as habitat for this species in the decades ahead, as forest buffers along fish-bearing streams mature and trees in those buffers attain the size and age where the structural conditions needed by swifts for roosting and nesting are present. This is currently a PHS species, and therefore WDFW has developed management recommendations for local governments, conservation groups and others to utilize for its continued conservation.
Western Yellow-bellied Racer	This species is considered extirpated in Washington and we have chosen not to include these species as SGCN.

Chapter 4 – Habitats of Greatest Conservation Need

COMMENT	RESPONSE
High alpine lakes are unique and should not be lumped into the Open Water formation.	We recognize that one of the weaknesses of the National Vegetation Classification is the lack of detail regarding aquatic systems. We are working to strengthen the aquatic components of the national vegetation classification, particular in terms of defining ecological systems and will incorporate these refinements as we work to implement the SWAP.
Listing habitat features next to each SGCN in that ecological system would make plan more useful to implementers. Consider using sources such as Johnson and O'Neill (2001) and expert department staff to bring more specificity to this section.	We added language in Chapter 4 (page 4-3) to indicate the habitat features based on the work of Johnson and O'Neill that were referenced throughout the plan in developing conservation actions for species.

COMMENT	RESPONSE
Terminology is confusing. Explain differences between PHS, HGCN, ESOC.	Additional clarification of the term Habitats of Greatest Conservation is provided in Chapters 2 and 4. This new language clarifies that for the purposes of the SWAP, Habitats of Greatest Conservation Need includes ecological systems of concern (those identified as imperiled) as well as those ecological systems considered especially important to SGCN. We have also clarified the differences between HGCN and PHS – namely that the lists of habitats contained within each were developed for difference purposes and different audiences.

Chapter 5 – Climate Change

COMMENT	RESPONSE
Eliminate stocking of high alpine lakes as a climate adaptation strategy. Fish in naturally-fishless systems reduce the abundance of larval amphibian populations.	The Department recognizes that in some cases stocking lakes in high alpine areas can have deleterious effects on native amphibian populations. The Department has several ways to minimize this potential negative effect. 1. The Department minimizes lakes where fish stocking occurs. There are thousands of high elevation lakes in Washington, of which less than 2,000 contain fish. Most high lakes, tarns, and ponds are fishless and no fish stocking occurs. In addition, many of the high lakes that are stocked are not good amphibian habitat. Amphibians prefer shallow, warm, productive high lakes and ponds, which in turn do not support fish stocking well. Fish stocking occurs in lakes that are steep sided and deep. Finally, the Department does not stock "new" high lakes; stocking occurs only at lakes that have historically been stocked. 2. The Department has also put in place measures to reduce the deleterious effects of stocking where fish stocking does occur sympatric with native amphibian populations. The Department has a high lakes stocking objective to stock lakes on a rotational basis, only stock lakes where reproduction cannot occur (or if reproduction can occur then to use triploid fish), mostly stock fish native to the range except in a few places, and stock at low densities with single age classes. This ensures that forage does not become limited to trout that could shift to consuming amphibians and that on a rotational basis most stocked lakes are fishless or at exceptionally low fish densities over time. Most lakes are stocked on a 3 to 10 year rotation based on fishing pressure. This approach is based on best science and outlined in the National Park Service fish stocking Environmental Impact Statement. 3. Finally, the Department is partnering with USFS and other land management entities to ensure that fish stocking is done in a way that does not preclude movement by amphibians through high elevation waters. WDFW is in the initial planning stages of ensuring aquatic connectivity of fishless waters throughout public lands in the Cascades. The Department is also working on identifying lakes where fish communities are likely to lead to elevated predation on amphibians. The Department estimates there are likely only 300 or so lakes (of the 7,000) where this is an issue, and we are looking for innovative ways to deal with these lakes.

Chapter 6 – Monitoring and Adaptive Management

COMMENT	RESPONSE
Ecosystem monitoring, multi-species monitoring and monitoring little known species are rarely	Both of these suggestions will be considered during the implementation of the SWAP.

COMMENT	RESPONSE
funded – suggest small dedicated fund for these.	
WDFW should do an annual TRACS summary for the public.	

Appendix B – Potential Range and Habitat Distribution Maps

COMMENT	RESPONSE
WDFW should do a report to assess the accuracy of the maps over time.	The Potential Range and Habitat Distribution Maps are considered a work in progress and we intend to refine and update them over time as new information becomes available regarding species occurrence data.
Add an index that lists SGCN distribution by county, similar to PHS.	While we appreciate the suggestion to make the maps as useful as possible, we want to clarify that these maps are not intended to be used as a substitute for the PHS maps currently published by the Department.

Appendix E – Prioritization Matrix

COMMENT	RESPONSE
Scoring tool should be provided on line.	WDFW will consider these options during the implementation phase of the SWAP.
Provide a real world example of using the criteria.	