

# U.S. Fish and Wildlife Service Surrogate Species Draft Technical Guidance Feedback and Response

September, 2013

## What We Heard

During an 8-month comment period on the Draft Technical Guidance that closed March 29, 2013, the Fish and Wildlife Service (FWS) received approximately 2,300 comments from 200 commenters within the agency (programs and employees), as well as from States and other conservation partners. Feedback on specific aspects of the Draft Technical Guidance spanned many topics and areas, including goals and objectives, scale, implementation and monitoring. Comments on these and other subjects will be addressed in the revised Technical Guidance and then submitted for independent peer review.

Specific recommendations included:

- Adding specific guidance on how to step down landscape-scale conservation objectives;
- Providing guidance on how to account for Regional and LCC boundaries when considering conservation objectives and surrogate species selection (most commenters recommended using the “biologically appropriate” scale);
- Clarifying whether population objectives will be the only measure of success or if other important metrics, such as those related to ecological integrity or water quality parameters for example, will be included;
- Determining whether FWS should define measurable objectives (i.e. population or others) for surrogate species exclusively or for all priorities identified within landscapes (trust species, surrogate species, and non-species activities); and,
- Eliminating redundant language and use of inconsistent or confusing terminology in the text.

FWS also received significant employee feedback calling for a more comprehensive and clear explanation of the bigger picture behind the Draft Technical Guidance – *why* FWS is implementing a surrogate species approach; how it will impact employees in their day-to-day work, program activities, and the agency’s overall mission; and, how it relates to other components of Strategic Habitat Conservation (SHC) implementation.

## How We’re Responding

Release of the Draft Technical Guidance in July 2012 was carried out under the auspices of the SHC Core Team, a group of FWS leaders representing Regions and Headquarters who were brought together more than two years ago to guide the application of SHC concepts and practices throughout our agency’s operations. Current key efforts in play include:

- **Finalizing the Technical Guidance** – With guidance from the Office of the Science Advisor, a Review Team from across the FWS was assembled to review and synthesize the

comments on the Draft Technical Guidance and provide recommendations on how to proceed. A Technical Guidance Revision Team, composed of FWS employees recommended by Directorate members and State representatives chosen by the Association of Fish and Wildlife Agencies (AFWA), will revise the document based on the Review Team's recommendations and additional input provided by the Core Team.

- **Charting Our Strategic Direction** – The Directorate responded to employee feedback that a clearer sense of vision and leadership was needed to implement this agency-wide change in how we approach our conservation mission by establishing an Executive Oversight Team (EOT) to work with the Core Team. Composed of Directorate members, the EOT is directly engaged in developing specific strategies needed to integrate SHC concepts and processes into all aspects of our work and to provide clarity on the agency's short- and long-term strategic goals and priorities.
- **Working With States** – An important theme that arose in comments on the Draft Technical Guidance is the importance of engaging partners, as early and as often as possible. Commenters also told us that State fish and wildlife agencies should be distinguished from our partners at large because States are the only other entities with a mandated public trust for the management of fish and wildlife. In response, the EOT and Core Team worked with leadership of AFWA to develop a clear, formal framework for collaboration in revising the Draft Technical Guidance and co-selecting surrogate species. To view a copy of the resultant Framework for Joint Selection of Surrogate Species (June 6, 2013), visit <http://www.fws.gov/landscape-conservation/pdf/Framework-for-Joint-Selection-of-Surrogate-Species.pdf>
- **Test-Driving the Surrogate Species Approach** – The revised Draft Technical Guidance will be subject to a formal peer review process. That process will take time, however, and there has always been an expectation that we would field test the guidance in select locations even as the peer review process unfolds. Field-testing is already underway in many Regions, and interim guidance to provide consistency and structure to those pilot efforts has been developed. To view the interim guidance, called Strategic Conservation Management Version 1.0, visit <http://www.fws.gov/landscape-conservation/pdf/Surrogate-Species-Guidance.pdf>. It is important to remember that this document is intended to guide our implementation of SHC/surrogate species pilot efforts while we await the final version of the peer-reviewed Technical Guidance and learn from pilot efforts.
- **Aligning Business Practices and Systems** – Perhaps the concern most consistently voiced by employees, not just with respect to the Draft Technical Guidance but also more broadly in terms of future FWS operations in support of SHC, is uncertainty about how the new way of doing business will impact our day-to-day jobs. For example, in terms of accountability for results, FWS employees currently respond to performance measures other than biological outcomes (e.g., stream miles restored or number of Section 7 consultations conducted). The Core Team is working to ensure that our performance measures as well as other business operations reflect and are aligned with our landscape-scale, strategic conservation priorities on the ground. The Core Team has assigned subgroups to work on tools that will support employees' need for specific guidance on what will be done differently going forward in

specific areas. Those tools include a landscape conservation planning and implementation handbook to provide consistent guidance; a Conservation Planning Database to support annual work planning, decision-making and performance reporting; and improved processes to effectively and consistently allocate resources and monitor performance objectives.

- **Expanding and Improving Communications and Engagement** – FWS leaders acknowledge the continuing need to articulate a clear and compelling vision for the future of the agency; and to demonstrate how implementation of SHC and the surrogate species approach will improve the effectiveness and efficiency of our conservation work with State and other partners and help us realize that vision. With this in mind, we are expanding communications and engagement efforts to reach wider and deeper into the Service and out to partners; to create more opportunities for two-way dialogue at all levels; and to ensure consistent communication about key decisions and actions across programs and Regions. We invite engagement from every level of the FWS and from our partners as the surrogate species selection process using the interim guidance moves forward and the revision of the Draft Technical Guidance is underway. Members of the Directorate, Regional Directorates, and Project Leaders are the key points of contact for our employees and partners to receive updates, ask questions, get clarifications, and provide input as we proceed with this important, transformational effort.

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