Current Situation (May 2025)

- The California Department of Fish and Wildlife (CDFW) Scientific Collecting Permit (SCP) system is experiencing challenges issuing & renewing collecting permits in a reasonably timely manner; some applications and renewals have been 'pending' in the system for several years.
- CDFW has implemented an informal interim authorization system (email renewals), but this stopgap measure has its own set of complications.
- CA Institute for Biodiversity, CA Academy of Sciences, Natural History Museum of LA County, UC Berkeley MVZ, and others have compiled a suite of <u>recommendations</u> and met with CDFW to discuss a way forward.
- In addition to the <u>responses</u> distilled below, CDFW requested more detail and a broader survey of users to provide detailed recommendations—particularly around improvements to the portal and related instructional materials, as they are working with a contractor to update the system. They have received <u>feedback</u> from the Western Section of the Wildlife Society.

Permit Application and Renewal Backlogs:

- 1. Review all overdue applications and provide a final decision within 30 days: CDFW disagrees, citing resource limitations and the size of the backlog.
- 2. Survey the community to identify applications awaiting approval or renewal: CDFW states this is unnecessary as they already have records of all SCP applications.
- 3. Immediately approve all pending SCP renewals for permits in good standing: CDFW partially agrees and has implemented an alternate solution to expedite renewals with minimal scope changes.
- 4. Allow continuation of permitted activities under expired permits if reporting requirements are met and renewal applications are submitted: CDFW agrees in some cases but notes regulatory limitations (Title 14 650(k)).

Additional Considerations:

- 1. **Establish a tiered permitting system**: CDFW agrees and supports differentiating between low- and high-risk applications to improve efficiency, but considers General and Specific Use permits as a form of a tiered system.
- 2. **Improve application review and renewal processes**: CDFW agrees and accepts various qualification documents, including Orcid IDs, to streamline the process.

- 3. **Modernize and clarify reporting requirements**: CDFW somewhat agrees and is flexible with data submission formats, provided they are compatible with Department databases. That includes accepting museum transfer logs as chain of custody proof.
- 4. **Add support and coordination between staff and stakeholders**: CDFW somewhat agrees and is working on improving communication, updating materials, and developing a new permit system with a transparent dashboard.
- 5. **Update rules to remove barriers and advance equity**: CDFW agrees and highlights efforts to encourage participation by community scientists, especially with respect to LAIs.
- 6. **Require Specimen Management Plans (SMPs)**: CDFW somewhat agrees, noting this would apply primarily to museums.
- 7. **Improve intra- and inter-agency coordination**: CDFW supports expedited processes for projects already permitted by the USFWS and seeks examples of coordination with other state agencies.
- 8. Clarify or improve process for both "citizen salvage" and entity salvage. CDFW supports salvage on General Use permits or as part of a Specific Use permit and has confirmed that museums don't need another special permit to accept legally salvaged specimens, but not all questions have been answered.

CDFW responses in some cases show some misunderstanding between the intent or implementation of the permit requirements and how they are currently being interpreted by users; better training or guidance may be helpful.