

# DOCKET

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Bureau of Land Management  
Brief Comments on the July 2010 Draft Interim Mitigation Strategy  
July 23, 2010

## General Comments:

- Given the importance of this strategy, in the short-term, and the precedent it will set for the long-term with the DRECP, we believe the agencies should have additional time to provide more substantive comments and prepare the document together as the REAT agencies. We recommend that this document be modified, by a collaboration of the REAT agencies, to serve as the interim strategy for the DRECP, as required by the Planning Agreement, in addition to its role as the strategy required by SB 34. An alternative would be to: strongly emphasize the interim nature of the document; focus on CDFG priority areas; de-emphasize the role and relationship to mitigation priority areas for the other REAT agencies; and, de-emphasize the role the document will play in the conservation strategy for the DRECP.
- In most locations where the REAT is referenced, a more accurate reference would be the “REAT agencies” .
- The document should specify which Desert Tortoise Recovery plan is being referenced. The 1994 plan or the 2008 draft revised plan.
- The document should emphasize off-site compensatory habitat management activities (enhancement and restoration) over limited on-site activities. The document currently focuses on on-site minimization actions instead of more comprehensive off-site compensatory habitat management.

## Specific Comments:

Page 14, Habitat Enhancements: This section and other references through the document read as if only on-site habitat enhancement is acceptable under the interim strategy. This section and the entire document should be modified to include and emphasize off-site habitat enhancement.

Page 15, Restoration: This section should be combined with the Habitat Enhancement section to create an overall Habitat Management section, which would include enhancement and restoration with an emphasis on off-site projects.

Page 18, paragraph 2, c) Eastern San Bernardino County: This area, variously described as a “Primary Acquisition Conceptual Area” and a “Mitigation Target Area” is also shown in Fig. 5 and 6 on page 29 and 33 (respectively).

We are concerned with the manner in which this area is described and the priority given to it for acquisition. We do not believe this area should be a priority for acquisition as mitigation, contributing to the conservation of listed and sensitive species. The area may have many values that make it desirable for acquisition, but not the wildlife values.

- We believe there is no identified occupied or historical MGS habitat in this area. The closest historical habitat for MGS is approximately forty miles west in the Avawatz Mountains. What information was used to determine was used to determine the importance of this area for MGS?
- To our knowledge, the MGS does not have designated critical habitat.
- The location is described as adjacent to the California-Nevada state line, and west of the Mojave Preserve. This description does not match the area shown on the map which is adjacent to the state line, but northeast of the Preserve.
- The area is managed by BLM, and while proposed for inclusion in the Mojave Preserve, is not currently within it.
- The only private inholdings within this area are the patented mining claims at the Castle Mountain Mine. While the waste rock and cyanide leach pads have been reclaimed, we believe they have very low habitat values for listed or sensitive species, and none are known to occur within the tracts.
- To our knowledge, the cited CEHC connectivity study did not address connectivity into Nevada, and did not include this area.
- While desert tortoise are known to occur in portions of this area, it is not designated Critical Habitat.

Page 36, paragraph 5: The current proposed size of the Ivanpah Solar project is 4,073 acres.