

Memorandum

To: David Harlow, Director, Desert Renewable Energy Conservation Plan (DRECP)

From: Kim Delfino, Defenders of Wildlife
Barbara Boyle, Sierra Club
Joan Taylor, Friends of the Desert Mountains
Johanna Wald, Natural Resources Defense Council
Jill Bays, California Council of Land Trusts
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Subject: Comments on DRECP Preliminary Conservation Strategy

Thank you for the opportunity to review and comment on the Preliminary Conservation Strategy (PCS). In addition to this cover memorandum, we have attached our specific comments on the PCS on the form provided in the request for comments. Our organizations, all stakeholders in the DRECP effort, fully support this critical plan and our comments are intended to strengthen the DRECP and help ensure that it conforms to the legal and regulatory standards for such plans, namely the California Natural Communities Conservation Planning Act and the Endangered Species Act.

Overall, the PCS is an informative document that compiles much of the biological and renewable energy resource information gathered to date and geographically displays this information. However the PCS does not offer a firm and clear vision regarding the process that the DRECP will follow in developing a conservation strategy. As the title implies, the PCS should focus on the conservation of species, natural communities and ecological processes; and not on optimal locations for development. Development planning should proceed after identifying crucial conservation areas and measures needed to meet pre-established conservation targets, as shaped by clear biological goals and objectives for this plan. This letter provides recommendations for using the information provided in the PCS plus additional information to develop a comprehensive conservation strategy. Specific comments on each section of the PCS are provided in the attached comment form.

The following are recommendations for developing a comprehensive conservation strategy:

- 1) **Establish conservation targets:** The first step in the process of developing a conservation plan is to clearly identify what species, natural communities and ecological processes will be covered under the plan. This requires an understanding of each resources' current status of protection, its vulnerability in the face of renewable energy development and its level of irreplaceability within the plan area. The process of selecting resources for inclusion in the plan is one that requires constant input from stakeholders and review by experts, such as the Independent Science Advisors (ISA). The main focus of the covered species working group (CSWG) should be to discuss and narrow down the list of resources to be covered under the plan.

- 2) **Gather baseline information:** The PCS provides baseline information on covered species (species profiles); however, this information should be augmented by an analysis of the condition, trend and overall health of all covered resources. Species distribution models that predict habitat suitability should include climatic and bioclimatic parameters in addition to biotic parameters such as vegetation/land cover. In this way, species habitat suitability can be predicted into the future under various climate change projections.
- 3) **Biological goals and objectives (BGO):** A conservation plan's building blocks are the specific and measurable biological goals and objectives, informed by the baseline information described above. If baseline information is unavailable efforts to gather more data through monitoring of species and their habitat should begin immediately in order to better understand what goals and objectives should look like. Further, the goals and objectives, both species-specific and at the broader ecosystem-level, as well as the list of covered species, should be peer reviewed by scientific experts including but not limited to the Scientific Advisory Committee.
- 4) **Develop a reserve design framework:**
 - a. *Build on previous conservation plans:* The DRECP needs to build on the existing conservation strategy for lands within the plan area, and especially for public lands as reflected in the California Desert Conservation Area Plan, as amended. Existing conservation plans should be fully utilized to identify conservation areas and actions and build upon them. Existing planning documents such as the Desert Tortoise Recovery Plan, West Mojave Plan and others provide a starting place for identifying conservation needs and opportunities for specific regions. Many other resources for identifying needed conservation actions in specific areas are available.
 - b. *Identify lands NOT of conservation value:* The PCS map uses simple GIS overlays with inadequate transparency to identify lands of low biological value. The process whereby lands of little to no conservation value are designated needs to be systematic, reviewed by independent science advisors and assessed for on-the-ground accuracy. The DRECP should actively pursue collaboration with research institutions conducting comprehensive spatial analyses of lands where development poses less of a risk to biological resources (UCSB's Biogeography Lab).
 - c. *Use of reserve design modeling software (Marxan):* Informed and wise use of modeling software should be done through a fully transparent process where inputs and parameters are subject to stakeholder input and scientific review. Before using Marxan or any other reserve design algorithm, it is crucial to conduct a sensitivity analysis whereby planners can adjust representation goals, clustering of planning units and other parameters and observe the effect in terms of the pattern and total area of the selected sites.
 - d. *Preserving connectivity between reserves:* Site-selection algorithms do not adequately account for connectivity between selected reserve sites and additional analyses should be done to reduce habitat fragmentation and the disruption of wildlife movements. Previous connectivity projects in the plan area should be reviewed and incorporated into the DRECP as appropriate.
 - e. *Mitigating adverse impacts of development:* In addition to core reserves and connectivity, proven mitigation actions should be chosen carefully based upon scientific evidence

of their efficacy. A DRECP-funded review of the history and effectiveness of mitigation and conservation actions in the region would help guide decisions on mitigation investments. Actions such as restoration and transplantation are not and should not be regarded as full mitigation. Translocation of desert tortoise in particular has shown low to non-existent success in recent studies, with over 50% mortality within just a few years according to Dr. Kristen Berry's work. However, control of subsidized predators such as ravens has shown to be valuable and should be considered as part of mitigation bundles.

- 5) **Adaptive Management and Monitoring Program:** An adaptive management program would provide the DRECP with a systematic process of using advances in scientific knowledge to continually improve management practices by learning from outcomes of previous actions. This is especially important in light of climate change and the potential shifts in species ranges. As recommended in the ISA report, this program should be implemented as soon as possible in order to reduce data gaps and uncertainties and improve plan actions over time.

The DRECP should consider developing the conservation strategy in phases whereby conservation and development track one another, with care to ensure that in more or less equal measure as development increases, related conservation is assured. The DRECP should also consider developing the conservation strategy according to subregions, as appropriate for covered species, communities and processes. This subregional approach should be coupled with landscape-scale analyses of connectivity as mentioned above. Lastly, the DRECP conservation strategy should include policy recommendations that provide incentives for developing the lowest conservation value, high resource value locations in the plan area.

Please contact us if you have any questions or would like to discuss our specific comments.



Kim Delfino
Defenders of Wildlife



Barbara Boyle
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Friends of the Desert Mountains



Johanna Wald
Natural Resources Defense Council



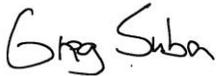
Jill Bays
California Council of Land Trusts



Garry George
Audubon California



April Sall
The Wildlands Conservancy



Greg Suba
California Native Plant Society

Attachment: PCS Comment form

DRECP Preliminary Conservation Strategy

Comment Form

Commenter (Your Name)	Comment #	Comment Location:					Comment (e.g., organization, content, grammatical comments)
		Chapter	Section #	Page #	Paragraph	Paragraph (from top)	
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society	1	1	1.1	1-1	1	<p><u>Important Elements:</u> Missing from the list of plan elements is the basic foundation of the PCS, namely the identification of lands containing habitats for the covered and planning species that are determined necessary to achieve the primary goals and objectives of the DRECP in conformance with the NCCP Act for the life of the plan. These lands and their associated habitats need to be identified in the context of what is required to protect and conserve ecosystems within the planning area. It is premature, and inappropriate, to identify anything but preliminary Renewable Energy Study Areas (RESAs) in the absence of lands determined necessary for ecosystem protection and conservation. Indeed, it should be clearly articulated that these RESAs will be revised, adjusted and/or eliminated as the conservation strategy is developed (including the conservation goals, objectives, targets and reserve design).</p> <p>The fundamental elements of the plan must be formulated to address the basic goals under the NCCP Act for this planning area: Contribute to the recovery of threatened, endangered and listing candidate species; and protect and conserve fully protected species and other species covered by the plan. To achieve these goals and objectives, the plan must establish the condition and trend of each of these species and their habitats within the planning area that are necessary for their conservation, recovery and protection. It is essential that this conservation strategy address species' habitat and adaptation needs relative to the effects of global warming, and cumulative adverse impacts due to existing and reasonably foreseeable multiple land uses.</p> <p>With regard to public lands under BLM administration, the goals and</p>	

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							objectives need to conform to management standards contained in the Federal Land Policy and Management Act and specifically for the California Desert Conservation Area (i.e., Federal Land Policy and Management Act, Section 601; BLM Policy Manuals 6840 (Special Status Species Management), 4180 (Land Health) and 6500 (Wildlife Habitat Management); and Fundamentals of Rangeland Health (43 CFR 4180.2); and Standards and Guidelines for Rangeland Health contained in BLM Resource Management Plans for specific planning areas (i.e., California Desert Conservation Area Plan, as amended, Eastern San Diego County Resource Management Plan).
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society	2	1	1.1	1-2	2		<u>Condor Study Area</u> : The Condor Study Area should be further refined and identified as a Condor Management and Recovery Area, thus establishing the importance of lands and habitats within the area for long-term management and recovery of the California Condor. This highly endangered species is responding to successful recovery actions and is known to be expanding its present range into suitable habitats outside of currently designated critical habitat.
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy	3	1	1.1	1-2	4		<u>The PCS</u> : Since the PCS, as presented, is not intended to be a reserve design or overall conservation strategy and lacks information about species models and habitat suitability and reserve design tools, it appears the PCS should be restated to simply reflect current land status, land management categories and the relative biological value of lands in the planning area. Despite its title, the PCS does not contain any conservation strategy information.

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California Council of Land Trusts California Native Plant Society							
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society	4	1	1.1	1-2-3			<u>Renewable Energy Study Areas:</u> In the absence of identifying any preliminary conservation land allocations, it is premature to identify anything more than very preliminary Renewable Energy Study Areas. In doing so, it seems to set forth development areas first without clearly articulating that these areas may be changed or deleted based on the conservation strategy, the PCS appears to be a renewable energy-driven plan rather than a ecosystem conservation protection plan under the NCCP Act. Until such time as the conservation allocations are clearly presented, we recommend that renewable energy study areas should be considered very preliminary and subject to potentially significant changes and deletions.
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society	5	1	1.1	1-3			<u>Initial Plan Integration:</u> We stress that it is premature to advance discussion of renewable energy development potential and attempt to formulate alternatives prior to and in the absence of a comprehensive ecosystem conservation and protection strategy. Ecosystem conservation and protection must be the basic foundation. The alternatives should focus on opportunities for renewable energy development, all of which should recognize and conform to the basic conservation foundation.
Defenders of Wildlife Sierra Club Friends of the Desert	6	1		1-4			<u>Next Steps:</u> Same comment as above – it is premature to address anything more than preliminary renewable energy development at this stage of the planning process in the absence of ecosystem conservation

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Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society							and protection requirements. There appears to be much greater emphasis on identifying renewable energy needs and opportunities and accepting recommendations for renewable energy development from industry, which appears to be driving the planning process primarily in the direction of renewable energy development rather than ecosystem conservation and protection. The alternatives should be formulated on varying degrees of development which must be consistent with the fundamental ecosystem conservation and protection requirement.
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society	7	2	2.1	2-1			<p><u>PCS Map</u>: Mapping efforts at this point should focus on the baseline biological information on species, communities and ecological processes. These need to be identified first and foremost, then goals and objectives set, then the conservation strategy would follow. The baseline biological information should also include critical information on the condition and trend of species and their habitats throughout the planning area to the extent that they are known. This is essential for all the at-risk or special status species.</p> <p>Following the development of the biological resources baseline map, as described above, the next step would identification of preliminary conservation areas or conservation study areas. In its current form, the PCS Map prematurely identifies Renewable Energy Study Areas. Opportunity areas for renewable energy development should stem from the basic ecosystem conservation strategy rather than precede it.</p> <p>All of the covered and planning species habitats and ranges within the planning area need to be incorporated into the PCS strategy before it can be meaningful. Furthermore, the PCS should account for the condition and trend of ecosystems and habitats for covered and planning species so that the plan can address stabilization, protection and restoration actions that are needed to achieve the goals and objectives of the plan. Habitat loss, degradation and fragmentation due to existing land use</p>

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							activities should be identified for corrective actions, and the alternatives under the basic ecosystem conservation and protection strategy should incorporate varying degrees of such corrective actions based on the severity of the cumulative impacts to species and their habitats.
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society	9	2	2.1				Table 2.1-1 (Land Categories): Within the category "Other Managed and Designated Areas" please add the following categories of lands: <ol style="list-style-type: none"> 1. BLM-designated Wildlife Habitat Management Plan Areas from the CDCA Plan Map of "Planned Management Areas for Fish and Wildlife." 2. BLM-designated Road Designation Restriction and Special Attention Areas as per the CDCA Plan Map of "Planned Management Areas for Fish and Wildlife." 3. BLM-designated Key Raptor Areas as per the CDCA Plan, as amended. 4. Lands acquired by the U.S. Army as mitigation for the adverse impacts of the Fort Irwin Expansion on the Desert tortoise and its habitat. Approximately 100,000 acres in the Western Mojave were acquired as of 1997. 5. Lands on which livestock grazing was eliminated by BLM for protection of the Desert tortoise. 6. Lands on which livestock grazing was eliminated through U.S. Army acquisition of grazing permits and base property tied to grazing allotments. 7. BLM-designated Unusual Plant Assemblages from the CDCA Plan, as amended. 8. BLM-mapped areas of potential Golden eagle and Prairie falcon foraging territories as per the CDCA Plan Map of "Sensitive, Rare, Threatened and Endangered Fish and Wildlife." 9. BLM-mapped "Known and Potential Bighorn Sheep Corridors as per the CDCA Plan Map of "Sensitive, Rare, Threatened and Endangered Fish and Wildlife."
Defenders of Wildlife	10	2	2.1	2-7			Table 2.1-2: Please add to the list of Biological Elements and Data

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Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society							layers the following: <ol style="list-style-type: none"> 1. Peninsular bighorn sheep linkage: http://consbio.org/maintaining-a-landscape-linkage-for-peninsular-bighorn-sheep 2. San Bernardino – Granite Mountains linkage: http://www.scwildlands.org/reports/SCML_SanBernardino_Granite.pdf 3. Joshua Tree – 29 Palms linkage: http://www.scwildlands.org/reports/JT_TP_Connection.pdf 4. Tehachapi linkage: http://www.scwildlands.org/reports/SCML_Tehachapi.pdf 5. California essential habitat connectivity areas: http://www.dfg.ca.gov/habcon/connectivity
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society	11	2	2.1	2-8			Table 2.1-2 (Natural Community Elements): For microphyll woodland communities that are mapped, please see BLM's Northern and Eastern Colorado Plan, Map 3-3/Dry Desert Wash Woodlands.
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California	12	2	2.1	2-8			Table 2.1-2 (Natural Community Elements): For washes, contact Kris Vyverberg, Senior Engineering Geologist, CDFG Ecosystem Conservation Division, (916) 445-2182/Email: kavberg@dfq.ca.gov.

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The Wildlands Conservancy California Council of Land Trusts California Native Plant Society							
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society	13	2	2.1	2-8			Table 2.1-2 (Umbrella Species Elements): The critical linkages for Desert bighorn as reflected on Figure 2-2 C are incomplete and limited to several relatively small land areas associated with interstate highways. We recommend expanding mapping of these linkages to cover all known and modeled connectivity areas contained in CDFG publications by Wehausen, Epps and Bleich; Dissertation by Epps; and BLM's CDCA Plan of known and probable Desert bighorn corridors, noted in our comments above.
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society	14	2					Table 2.1-2 (Umbrella Species Elements): We strongly recommend inclusion of the Golden eagle in this category since it is a top predator and is widespread throughout much of the study area in suitable habitat. Habitats that can be mapped include known and suspected foraging areas surrounding nesting areas (See CDCA Plan of 1980, Map of "Sensitive, Rare, Threatened and Endangered Fish and Wildlife" and various recent survey reports for this species associated with environment reviews of solar and wind energy projects.
Defenders of Wildlife	15	2					Table 2.1-2 (Umbrella Species Elements): Due to its widespread

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Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society							occurrence and status as a Sensitive Species, we recommend the Western burrowing owl be added as an umbrella species. Within California, the majority of the known Burrowing owl population occurs within the planning area.
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society	16	2					Table 2.1-2 (Narrow Range Species Elements): We recommend the following species be added to the table and that the PCS include a specific conservation recommendation for all such species: Yellow-billed cuckoo, Inyo California towhee, and the White-margined Beardtongue.
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands	17	2		2-16	3		<u>Conservation strategy:</u> Conservation reserves or areas sufficient to provide lasting and effective habitat conservation and protection need to address not only the effects of renewable energy development alternatives, but also the condition and trend of the habitats within these areas which may be adversely affected by existing and planned multiple land use activities. The PCS should address comprehensive actions necessary to stabilize, protect and enhance habitat conditions so that the primary conservation and habitat protection provisions under the NCCP

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Conservancy California Council of Land Trusts California Native Plant Society							<p>Act can be realistically achieved.</p> <p>Conservation reserves or areas should be protected from significant adverse impacts, and mitigation measures should not be considered as a means to allow them to be authorized in these areas. Mitigation measures are largely tools to minimize the “take” of listed or otherwise protected species and have little to no effect on limiting habitat loss due to projects, especially large-scale solar energy facilities which typically occupy of thousands of acres of land.</p> <p>Compensatory habitat acquisition has not been demonstrated to be an effective means of offsetting adverse impacts and especially achieving a no net loss or full mitigation standard. Habitat acquisition combined with habitat enhancing actions on other existing habitats is considered adequate to fully mitigate adverse impacts to various protected species, but the amount and availability of habitats for acquisition and enhancement has not been tested or achieved for any recently permitted solar energy project in the planning area.</p> <p>Before mitigation, compensation and habitat enhancement actions are considered and applied, each needs to be fully analyzed for its benefits, effectiveness and cost. We suggest the DRECP fund a research project to review the effectiveness of various mitigation and conservation actions in CA to identify what works and what does not work.</p>
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy	18	2		2-16	4		<p>We are concerned that areas of moderate to high biological resources value are perceived as places where renewable energy projects would be located and that project-specific environmental reviews would be used to identify specific issues, mitigation and permitting requirements. The PCS should be based on a sound conservation reserve system which identifies areas which will not be subject to significant adverse impacts from renewable energy projects. Conducting environmental review and applying mitigation measures on a project-by project basis is essentially the current situation which we need to end as quickly as possible.</p>

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Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society	19	2		2-17			<p><u>General Assumptions and Considerations:</u></p> <p><u>Bullet 1</u> – Please explain what “core habitat areas” are and what species they pertain to. We raise this as a potential issue because we are not aware that such areas have been defined, accepted or proven to represent actual conditions on the ground.</p> <p><u>Bullet 2</u> – Please explain what is meant by the statement that moderate and high biological resource areas were identified through consideration of “...the unique ecological processes and fragility of desert ecosystems pursuant to the Federal Land Policy and Management Act of 1976 and California Desert Conservation Area Plan of 1980, as amended.” Our reading of the Federal Land Policy and Management Act, and especially Section 601, indicates that the entire California Desert Conservation Area is unique, sensitive, fragile and easily damaged by the combined effects of a multitude of human activities. In addition, we are now faced with the additional impacts projected to occur in the near future due to global climate change.</p> <p><u>Bullet 4:</u> Please explain what is meant by “core habitat areas and configuration of landscape linkages and wildlife corridors for widespread species...” We ask this question because it is not clear what criteria were used to define these areas nor is there information about their occurrence in the planning area.</p>
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources	20	2		2-18			<p><u>Biological Elements of the Moderate to High Value Areas:</u> We are pleased to see these areas are being identified and mapped and also note that these areas may change as new information on covered and planning species and their habitats is obtained. As noted in our comments above, we believe additional information and habitat</p>

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Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society							importance needs to be acquired and displayed on the map regarding habitat linkages and movement corridors, Golden eagle and Prairie falcon foraging territories surrounding known and probable breeding sites, BLM designated Key Raptor Areas, and Desert bighorn movement corridors. The latter has not been addressed in the PCS maps because the critical movement linkages are limited only to certain potential crossings at I-10, I-15 and I-40. The most critical Bighorn linkages in the planning area are those that now occur in largely undisturbed areas and these have not been adequately studied or mapped.
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society	21	2		2-19			<u>Renewable Energy Study Areas (RESAs):</u> As noted above, we consider it premature to identify RESAs because the ecosystem protection and conservation lands have not been fully identified and mapped due to various data gaps. We realize these areas may change as new information is acquired and reflected in the PCS map. Of the mapped RESAs, we note that one located generally west and north of Barstow extends into a BLM designated ACEC for the Desert tortoise and includes some of the lands acquired by the U.S. Army as part of the impact mitigation tied to the Fort Irwin expansion. The area also appears to be located within one of the former livestock grazing allotments (Harper Lake) that was retired as part of the Fort Irwin impact mitigation. Another RESA, located generally in the Johnson and Lucerne Valley area, overlaps with two habitat linkages identified generally as the San Bernardino-Granite Mountains Connection by S.C. Wildlands.
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of	22	2		2-20			<u>Condor Study Area:</u> The Condor Study Area should be further refined and identified as a potential Condor Management and Recovery Area, thus establishing the importance of lands and habitats within the area. This highly endangered species is responding to successful recovery actions and is known to be expanding its present range into suitable habitats outside of currently designated critical habitat. Given the existing and planned wind farm projects within this area, together with the uncertain and largely ineffective current approaches to avoiding or minimizing potential avian impacts, it is essential that a strong protective management strategy be applied to this area at the earliest opportunity.

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Land Trusts California Native Plant Society							We also recommend that the Golden eagle and other raptors be included in this effort.
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society	23	2		2-22	3		<p><u>Biological Goals and Objectives:</u> Although it is stated that the conservation strategy adopted in the final DRECP is anticipated to be “complex”, we stress the importance of considering strategies or actions that will clearly be effective, timely and efficient. We also recommend that the strategies and actions be easy to understand, as well as readily applied and easily monitored for effectiveness.</p> <p>Biological goals and objectives must be established early in this process as they are essential in establishing and evaluating reserve design and in crafting conservation measures. We recommend that the DRECP follow the model of the “logic chain” framework that was developed by the Bay Delta Conservation Plan biological goals and objectives workgroup. The framework developed by the BDCP sets forth a hierarchy of global goals and objectives which describe outcomes necessary for recovery. Plan goals and objectives describe what the plan will do to contribute to recovery of the ecosystem within the plan area. Biological goals describe future conditions of ecosystems, natural communities, and species, which are expected to be achieved through plan implementation. Biological goals are typically qualitative rather than quantitative. Objectives are measurable commitments that when combined with other objectives will achieve a biological goal. Objectives capture the direct changes to the environment expected from the conservation measures and provide measurable targets. Species-specific goals and objectives should address species-specific stressors and habitat needs that are not addressed under the higher order ecosystem and natural community goals and objectives. A key part of the logic chain approach is to also identify assumed stressors to covered species and ecosystem processes. These stressors are physical, chemical and biological attributes to the desert that have changed dramatically over the past several decades and are expected to continue</p>

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							to change. Conservation measures are the actions taken to reduce stressors and achieve plan objectives. The logic chain approach requires an indication of the likelihood (certainty) that conservation measures will produce their anticipated effects (both positive and negative).
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society	24	2		2-22 2-23			<u>Plan Structure:</u> We appreciate the emphasis on landscape or broad-based conservation strategies. It is unclear if there are actual differences between the Landscape and Natural Community Goals. It appears the most important aspect of the Landscape Community Goals is maintaining broad and effective biological connectivity across the entire planning area in a manner that remains functional and robust in the face of stochastic events including fires, drought and the effects of global climate change.
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society	25	2		2-25 to 2-44			<u>Goals and Examples in Table:</u> Overall, see comments in Comment #23. In addition, we recommend that this goal be applied throughout the entire plan area and that it not be limited to a “representative suite of habitat types.” It should be applied to all habitats with natural plant communities and not limited to as yet undefined “core conservation areas and habitat linkages” and especially not limited only to Legally and Legislatively protected areas. Substantial additional work needs to be done to identify all essential habitats for covered and planning species and their broad, landscape level linkages.
Defenders of Wildlife Sierra Club Friends of the Desert	26	2		2-35			<u>Bald Eagle:</u> Bald eagles have been observed at Haiwee Reservoir during CDFG winter season surveys. We have made this comment previously.

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Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society							
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society	27	2		2-37			<u>Bighorn Sheep</u> : Please consult CDFG on the list of known populations within the planning area. Those listed that appear to be outside of the planning area include the White Mountains and San Gorgonio Mountains (the latter is actually within the San Bernardino Mountains – San Gorgonio is an individual peak within the range). Among the known populations that are within the planning area but are not listed are those located in the Avawatz Mountains, Black Mountains, Funeral Mountains, Panamint Range, Nopah Range, Granite Mountains, Providence Mountains, Big Maria Mountains, Palen Mountains, Coxcomb Mountains, Chuckwalla Mountains, Little San Bernardino Mountains, Turtle Mountains, Newberry Mountains, Ord Mountains and Stateline Hills. The Slate Range and Rodman Mountains may support populations on a seasonal basis. Also absent are the known populations of the Peninsular Ranges within the plan area in western Imperial and eastern San Diego Counties.
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands	28	2		2-38			<u>Bighorn Sheep</u> : In the example given for conserving this species, the term “critical linkages” is used. Critical habitat linkages on the PCS map for Bighorn sheep are incomplete because they are limited to several known or potentially important crossings at barriers posed by I-10, I-15 and I-40. CDFG should be asked to expand the map of Bighorn linkages, to include all known and probable movement corridors throughout the planning area.

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Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society	29	2		2-40			<u>Desert Tortoise</u> : Please include Desert tortoise linkage habitats throughout the plan area because these are necessary to maintain connectivity between recovery units, and allow for gene flow and recolonization of suitable habitats.
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society	30	2		2-41			<u>Flat-tailed Horned Lizard</u> : Please note that the Rangewide Management Strategy adopted by BLM includes designated Management Areas as well as suitable habitat that link these areas. The Rangewide Management Strategy addresses management requirements for both these areas.
Defenders of Wildlife Sierra Club	31	2		2-42			<u>Mohave Ground Squirrel</u> . The theory that Mohave ground squirrels persist in “core areas” and that they are linked by movement corridors

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Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society							has been suggested by Leitner, but this is a theory that has not been tested. There is substantial supporting evidence in the West Mojave Plan (BLM, 2006) that the Mohave Ground Squirrel occurs broadly over large expanses of natural habitat within its range, with populations waxing and waning in response to precipitation and primary plant productivity. The BLM's designated Wildlife Habitat Management Area for this species, established in 2006 in the West Mojave Plan amendments, is the most widely accepted model of suitable habitat for this species.
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society	32	2		2-43			<u>Southwestern Willow Flycatcher/Willow Flycatcher</u> : Riparian habitat outside of designated or proposed critical habitat for this species and subspecies is important in providing opportunities for feeding and resting during migration and for population expansion. Such expansion may be occurring from the Kern River Preserve system and riparian habitats along the eastern Sierra Nevada, which are used by this species, although nesting has not been documented to date. Specific areas containing these riparian habitats that are known to be used include Cottonwood Creek near Jawbone Canyon, Kelso Creek, Indian Wells Canyon and Nine-mile Canyon. Although unsurveyed, it is highly likely that this species also utilizes riparian habitat in Sage Canyon and Five-mile Canyon. Habitat degradation and threats are associated with proposed wind energy development, livestock grazing, off-road vehicle use and firearm use in riparian areas during the spring and early summer seasons.
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California	33	2		2-44			<u>Next Steps</u> : <u>Bullet 2</u> – We stress, again, that the DRECP alternatives should focus primarily on varying degrees of renewable energy development, all of which are consistent with one basic conservation foundation established for the plan area. The basic conservation foundation should not be compromised simply to accommodate a certain amount of projected renewable energy need or demand based on the Energy Calculator

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The Wildlands Conservancy California Council of Land Trusts California Native Plant Society							<p>projections for 2040 and 2050. Although useful for long term planning, the assumptions made in the Energy Calculator may or may not become reality for a number of reasons including solar energy development in California occurring outside the plan area, changes in technology, economic and financial issues, and potential for more rapid development of decentralized photovoltaic facilities statewide.</p> <p>Alternatives for development could include phased development over time as a means to direct immediate opportunities for development to the lands having little or no biological or conservation value. Subsequent phases could provide for additional development in areas that are currently too highly parceled to accommodate rapid development.</p> <p>We believe that the conservation goals and objectives for each species and for landscape-scale ecosystems should not differ among the alternatives. It is essential that all long-term conservation and recovery needs of species and their habitats they depend on are met and not compromised through various alternatives that will be developed during the next phase of the planning process.</p>
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society	34	2		2-45			<p><u>Reserve Design:</u> The conservation analysis that will be the basis for the Reserve Design should include a condition and trend assessment of habitats for the covered and planning species, and actions necessary to remove or minimize current and planned land use activities that diminish compromise the ecosystem values.</p> <p><u>Softline Conservation Areas:</u> Softline Conservation Areas should be utilized with caution and restraint and should not compromise the biological integrity and long-term conservation of habitats that support significant populations of covered and planning species. Any mitigation measures deemed necessary to minimize or offset adverse impacts to significant populations of these species and their habitats must be proven to be effective, timely and lasting. Softline Conservation Areas should be limited to the exterior or fringes of habitats that support significant biological resources and should not be located in habitat</p>

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							linkages.
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society	35	3	3.1	3-2	1		Mapping of active dune systems: Consider incorporating remote sensing techniques to accurately map dune systems instead of or in addition to the use of aerial imagery.
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society	36	3	3.1	3-2	3		Further analysis of dune systems: incorporate information from the scientific literature.
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council	37	3	3.1	3-2	6		Vegetation alliances: it is critical that there be a process for incorporating information from current mapping efforts (Keeler-Wolf) into the special features mapping in the PCS.

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Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society							
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society	38	3	3.1	3-3	1		Consider ways in which to incorporate new vegetation data, especially the information from Todd Keeler-Wolf's work, that can augment the 1999 data on Unique Plant Assemblages. This is critical to developing an accurate land cover and vegetation cover for use in species modeling and reserve design modeling.
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society	39	3	3.2	3-4			Natural Communities: Comments will be provided on the memo presented to the CSWG on November 14, 2011 regarding the crosswalk from the ecological system presented in the FCSR Initial Land Cover Map and the NVCS classification system.

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Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society	40	3	3.3	3-7	1	Additional Covered Species: Invertebrate species provide critical ecological functions and must be thoroughly considered for a successful conservation plan. Arthropods continue to be grossly underrepresented in the Covered Species list. The Independent Science Advisors provided a list of desert insects recently reviewed by USFWS as candidates for threatened and endangered status (Federal Register 71(160) 47765-47771; 2006) and gave suggestions for literature to review regarding special status invertebrates in the Mojave and Colorado Desert (Bunn et al. 2007). Experts on arthropods and insects in the planning region are listed in Appendix C of the ISA report and should be contacted for expert opinion regarding invertebrates to be included in the DRECP Covered Species list.	
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society	41	3	3.3	3-9		Table 3.3-2: Additional Species Being Considered for Coverage: Same as above. This table should include invertebrate species as they provide ecosystem functions and services and their protection is necessary for a successful conservation plan.	
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California	42	3	3.4	3-14	1	Reference citations: It is always best to retrieve information on species from the primary source. We encourage the DRECP to continue to source information from primary sources.	

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Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society	43	3	3.4	3-14	2		Reference citations: We encourage the DRECP to do complete literature reviews for the most up-to-date scientific studies that have been conducted on species. This can be done using ISIS Web of Knowledge (http://www.webofknowledge.com/) article searches, for example.
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society	44	3	5.3	3-20			GIS Data Layers: Land cover – models should be updated with the NCVS land cover classifications and compared to note changes in modeled habitat for species. Ecoregion subsections – this data from the USDA may not accurately reflect “limits to the range” of species.
Defenders of Wildlife	45	3	5.3	3-21			Model Review and Refinement: Occurrence data should be reviewed to

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Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society							determine whether the records were historic or otherwise unsuitable <i>before</i> using the data records to test the model.
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society	46	3	5.3	3-22	1		We support the DRECP's effort to send species models for expert and agency review and believe this should be done on a more regular basis.
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands	47	3	6.1	3-22			Classification of Protected Lands: Too generalized to lump into two categories of "protected" and "not protected". Consider doing the analysis for the four different classifications.

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Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society	48	3	6.2	3-26			Natural Communities: Analysis needs to be completed with the new NVCS classification for natural communities.
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society	49	3	6.2	3-27-3-32			Tables 3.6-2 and 3.6-3: Provide percentages for each of the Gap Classification Types instead of Types 1&2 lumped together. Type 2 classification includes many land designations that do not provide adequate protection for sensitive species.
Defenders of Wildlife Sierra Club	50	3	7	3-34			There are many efforts underway to map disturbed lands or areas with the lowest risk to biodiversity (TNC, UCSB). We encourage collaboration

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Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society							with these efforts so that the most robust and accurate model of disturbed lands can inform the DRECP process.
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society	51	3	7	3-35			Land cover types classified as disturbed or agricultural land: Rural should not be included as “disturbed” land, as many rural lands provide habitat for species.
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy	52	3	7	3-36			Table 3.7-1: It is not advisable to assume that classifications in FMMP data are necessarily an accurate reflection of reality. Consider assessing the accuracy of these classifications using aerial photography, expert knowledge or groundtruthing.

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California Council of Land Trusts California Native Plant Society							
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society	53	3	7	3-37			FMMP Prime Farmland Classification: This method should be pursued, as it seems to have the potential to yield more accurate mapping of currently active farmland.
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society	54	3	8	3-45			UC Santa Barbara has already completed a very thorough spatial analysis that models areas with low risk of conflicting with biological resources. A review of the model would enhance DRECP's spatial analysis of agricultural and disturbed lands, as it includes off-site impacts (the need for new transmission lines) as well as onsite impacts. Contact Frank Davis at UCSB's Biogeography Lab for more information.
Defenders of Wildlife Sierra Club Friends of the Desert	55	3	8	3-45			Additional Ongoing Research Project: Conservation Biology Institute study on the cumulative impacts of wind energy development.

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Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society							
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society	56	4		4-1			General comment on Section 4: It is premature and inappropriate to include a chapter on development planning in the PCS. A conservation strategy should focus solely on developing conservation goals and objectives for species and natural communities that are covered under the NCCP. Planning for renewable energy development is a process that is separate from developing a conservation strategy for covered species and natural communities.
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of	57	4	1.2	4-7	3		Conservation Reserves: In addition to Category I lands, lands that pose high risk to biological resources if developed should be considered. See UCSB's low risk modeling white paper and spatial analysis for more information.

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Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society	58	4	1.2	4-8	1		Wind: Development constraints should include land needed for the conservation, protection and recovery of protected/covered species, specifically but not exclusively the California Condor and the Golden Eagle.
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society	59	4	1.3	4-13			Transmission Planning: Transmission planning must include consideration of critical habitat linkages and landscape-level conservation concerns. Species habitat are likely to shift due to climate change and conservation of land needed for species to move and adapt to changing climate needs to be addressed in transmission planning.
Defenders of Wildlife Sierra Club Friends of the Desert Mountains	60	4	1.4	4-13			The conflict between high to moderate biological value and renewable energy resource is expected which is why we recommend that conservation strategy emphasis be placed on conservation goals and objectives first and foremost. Once lands have been identified that need

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Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society							to be conserved for covered species, then the analysis of renewable energy potential can begin in the remaining lands.
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society	61	4	2	4-18	1		Conservation land should not be determined based on the land needed for renewable energy development but based on the sound conservation science related to covered species protection and recovery.
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts	62	4	3	4-22			<u>Disturbed lands</u> : Incorporate information from the detailed mapping effort by UCSB Biogeography lab regarding lands that pose less conflict for biological resources.

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California Native Plant Society							
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources	63	5	5.0	5-1			<u>Plan Integration</u> : The PCS should be stand-alone and not be compared with the Renewable Energy Study Areas that were presented in the RETI. RETI lacked a comprehensive examination and verification of biological resources and lands with conservation value.

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Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society							
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society	64	5	5.1	5-1- 5-2			<p><u>Plan Structure:</u> The process for plan development should proceed at this time without regard to participating entities. Although it would be desirable, it is not essential that all potential participating entities have indicated intent to be covered by streamlined incidental take permitting provisions of the plan. Ultimately there is no guarantee that entities actively participating in the plan process would be a signatory of the final plan.</p> <p>However, it would be desirable and advantageous to developers seeking permits for projects on private land to have maximum participation by local jurisdictions, and especially at the county level primarily because there appear to be large areas of low biological value lands in private ownership that are highly suitable for solar energy development. It appears this is especially the case in the western Antelope Valley and Imperial Valley.</p> <p>Further, we believe it is essential for purposes of implementing a valid conservation strategy for this plan that a critical number of counties engage formally in this plan. There is no way that this plan can be implemented based solely on conservation occurring on federal and/or state lands. Too many species required some amount of private land in order to achieve a “contribution to recovery” finding. Without agreement by specific counties to implement the conservation strategy, a finding cannot be reasonably made that the conservation strategy will be implemented with any certainty.</p>

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							Therefore, we strongly recommend that as this plan moves forward, it does so with the plan participants anticipating that this plan will be a comprehensive plan with the counties with the critical private land areas engaged in this process.
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society	65	5	5.2	5-2- 5-3			<u>Renewable Energy Development Opportunity Areas:</u> In the absence of identified conservation and reserve study areas for biological resources, we consider it premature, unnecessary and counter-productive to identify potential renewable energy development areas. We recommend establishing conservation and reserve areas first, and then pursue identification on potential development areas that fit within the conservation and reserve study areas that are deemed necessary to achieve the ecosystem and species conservation requirements under the provisions of the NCCP and HCP, as well as conform to the federal requirements for management of biological resources on public lands within the California Desert Conservation Area under BLM administration.
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society	66		5.3	5-3- 5-6			<u>Additional Plan Integration and Comparison to other Planning Initiatives:</u> While this section is interesting and relevant background information, we continue to advocate that the DRECP be developed as a stand-alone strategy under the legal and regulatory standards of the NCCP Act and Section 10 of the Endangered Species Act, and that it not be unduly influenced by RETI and the BLM/DOE Solar PEIS process. RETI is not a decision document, and the PEIS decision has yet to be made. At the appropriate time following completion of the DRECP, plan integration will proceed through subsequent consideration and adoption of its provisions by the BLM, State and local agencies, as they deem appropriate.
Defenders of Wildlife	67	6	1	6-1	2		ISA group: The DRECP should continue to solicit input from this group in

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Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society							developing the conservation strategy. The last input received from the group was over a year ago in October 2010. In order to reduce uncertainties and avoid costly errors, we recommend that the ISA group be more actively incorporated into the planning process.
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society	68	6	1	6-1	4		It is critical to obtain scientific review, but how this scientific information is interpreted and utilized by the DRECP needs to be more transparent. The sources of information need to be clearly stated and referenced for stakeholders to review.
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands	69	6	2	6-2			External Expert Review: We are concerned about how the information from external experts will be interpreted and utilized by the REAT agencies. We urge the REAT agencies to make public the information from the ISA group to the extent possible so that interpretation and use of the scientific information provided is transparent.

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Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society	70	6	3	6-2			Scientific Review Workshop: Include species modeling approaches (especially species distribution modeling using bioclimatic factors) in the list of biological topics, as scientific experts can offer advice on methodologies and data sources.
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society	71	7		7-1			a. Species Profiles: We encourage the DRECP to complete species profiles by pulling in information from experts and from previous conservation plans completed within the planning area. Species profiles should be completed for all covered, proposed covered and planning species.
Defenders of Wildlife Sierra Club	72	7		7-1			b. Species Models: The “expert-based” species models (GIS overlay models) should be as transparent as possible and they should not be

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Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society							used as the primary foundation for siting development or conservation actions. All CNDDDB occurrence data are spatially biased and GIS overlay techniques for modeling species cannot account for this bias. All occurrence data (CNDDDB or otherwise) should be reviewed before utilizing it in forming models. Statistical species distribution models should include primarily bioclimatic parameters and be completed for species that have sufficient data for this type of modeling. There are concurrent efforts underway to model species distributions using statistical modeling approaches and we recommend consulting with the scientific institutions (such as UCSB's biogeography lab – Frank Davis, Lee Hannah, David Stoms) to ensure the highest quality analyses are included in the DRECP.
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society	73	7		7-1			f. Gap Analysis: We recommend ensuring there is scientific review of the gap analysis and we also encourage the DRECP to make use of existing planning documents in completing this study.
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands	74	7		7-1			g. Reserve selection modeling: We recommend first establishing more clearly the representation goals for each of the species, communities and processes that are included in the plan before beginning to run Marxan. We encourage the DRECP to make all of the assumptions and representation targets that are used as inputs in Marxan as transparent as possible so that stakeholders can easily see which goals/targets are being prioritized. We recommend augmenting the Marxan analysis with an assessment of connectivity between reserves, and irreplaceability and

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Conservancy California Council of Land Trusts California Native Plant Society							vulnerability of reserves. Additionally, when using the reserve design algorithm, sites previously designated as recovery areas for sensitive species should be locked in and efforts should be made to enhance the protection of these areas by buffering them.
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society	75	7		7-1			h. We recommend that biological goals and objectives be established prior to beginning the reserve design process and that they be based on the best available biological information on the current status of covered species, communities and ecological processes. See also Comment #23.
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society	76	7		7-2			Development Planning: We believe that this should be completed after the appropriate steps have been taken for identifying a conservation strategy – defining biological goals/objectives and representation targets, developing the reserve design, etc. While the comprehensive reserve network is being established, we strongly recommend that any near-term siting be done in areas that have been identified as not important to achieving conservation goals, i.e. areas where native vegetation has been removed and the soil surface disturbed through grading, grubbing or tilling.
Defenders of Wildlife Sierra Club	77	7		7-2			Alternative Conservation Strategies Development: As an NCCP, the DRECP should primarily focus on developing a conservation strategy for

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Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society							the protection and recovery of species covered in the plan. We believe it is inappropriate to consider alternative conservation strategies based on analyses of the level of development desired. We recommend establishing the conservation plan that will meet the BGO and then considering development alternatives once the conservation plan is locked in.
Appendices							
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society	78	A-1	1	A1-1			Appendix A-1: We strongly recommend ensuring the quality and transparency of all analyses included in the PCS map. We also would like to ensure the inclusion of recovery/management areas from previous comprehensive planning efforts in the plan area.
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands	79	A-2	2	A2-1			A.2 Reserve Design Concepts: This section needs to focus less on theory and more on how the DRECP will take reserve design concepts and use them in developing a conservation strategy.

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Conservancy California Council of Land Trusts California Native Plant Society							
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society	80	A-2	4	A2-3			Marxan: Forces inclusion of existing reserves, recovery areas, study areas, etc. as identified by previous plans. Adjust costs to prioritize buffering existing reserves first. The parameter choices, cost surface, representation goals/targets, etc should be based on a thorough analysis of the recent literature and studies, as this field is rapidly changing.
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society	81	A-2	4	A2-4			Marxan may need to be followed by site prioritization analysis which should include consideration of reserve vulnerability, reserve irreplaceability and the degree of connectivity a single reserve contributes to the reserve network as a whole.
Defenders of Wildlife Sierra Club	82	A-2	6	A2-6			We support efforts to incorporate analyses of connectivity in the reserve design process.

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Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society							
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society	83	App. B-2					Golden Eagle: Please update the documented occurrence of Golden eagles in the plan area based on recent surveys for nesting territories performed in support of environmental studies for various wind and solar energy projects. In addition, the BLM data on this species as well as other raptors (e.g., Prairie falcon, Red-tailed hawk) collected on public lands in the CDCA collected periodically beginning with the first desert-wide inventory in 1977 and 1978 needs to be included. The CDCA Plan of 1980, and specifically the Map of Endangered, Threatened, Rare and Sensitive Fish and Wildlife” needs to be used as one of the sources of information about Golden eagle and Prairie falcon foraging territories surrounding documented nesting locations. Also, the Cady Mountains needs to be included because it contains numerous Golden eagle nesting territories.
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands	84	App. B-2					Willow Flycatcher: Willow flycatchers, and possibly Southwestern subspecies, have been documented in some of the eastern Sierra Nevada canyons based on professional surveys contracted by BLM in about 2002. Indian Wells and Nine-Mile Canyons were used by this species during migration, but breeding was not observed. Based on these documented occurrences, the species likely occurs along Kelso Creek and Five-Mile Canyon. Over 30 Willow flycatchers were recently observed at Cottonwood Creek (tributary to Jawbone Canyon) during

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Conservancy California Council of Land Trusts California Native Plant Society							surveys performed in support of an environmental review for a proposed wind farm project (for information see Final EIR, Final Avian Report, North Sky River Wind Energy Project, published by the Kern County Planning and Community Development Department. Contact Larry LaPre or Shelley Ellis of the BLM for further information on BLM studies and reports.
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society	85	App. B-2					Bald Eagle: Bald eagles have been observed by CDFG (Blankinship, retired) and BLM (Aardahl, retired) at Haiwee Reservoir during winter season surveys.
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society	86	App. B-2					Nelson's Bighorn Sheep – Peninsular Ranges DPS: For recent documented sightings within the plan area, please see the environmental reports and biological opinions for the Imperial solar project and the proposed Ocotillo Express wind farm project, both located in western Imperial County. Desert Bighorn: Desert bighorn populations occur in additional ranges within the plan area that are not listed, perhaps because CDFG did not conduct systematic surveys of them for purposes of the 2009 and 2010 reports. Populations are also known to occur in these additional ranges: Avawatz Mountains, Black Mountains, Funeral Mountains, Panamint Range, Nopah Range, Granite Mountains, Providence Mountains, Big Maria Mountains, Palen Mountains, Coxcomb Mountains, Chuckwalla Mountains, Little San Bernardino Mountains, Turtle Mountains, Newberry Mountains, Ord Mountains and Stateline Hills. The Slate Range and

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							Rodman Mountains may support populations on a seasonal basis.
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society	87	App. B-2					Mohave Ground Squirrel: Missing from the information on recent occurrences within the plan area are BLM live trapping records generally from the period 1974 through 1980. BLM conducted live trapping surveys in support of the Red Mountain and El Paso plans in 1974 and 1975. In 1980, BLM conducted systematic and concurrent surveys at 22 locations in the western Mojave within the species range in order to establish occurrence and relative density. BLM also did substantial work on Mohave ground squirrel occurrence and habitat affinity in support of the West Mojave Plan in 2006. We strongly recommend that the above information be obtained directly from BLM and utilized in preparing a revised species account. Specifically, see Appendix M of the West Mojave Plan. We recommend that reference to "core areas" for the Mojave ground squirrel be discontinued because they are hypothetical and based on live trapping conducted over a relatively short time span. Rather than refer to certain areas as "core" we recommend they be described as areas of potential superior habitat quality, but for yet to be established reasons. We have made these comments previously but they do not appear to have been considered or reflected in the species account.
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society	88	C		C-1			Expert-based models: We recommend reviewing all occurrence data, especially CNDDDB data before using it in the creation of GIS overlay models. The occurrence data are spatially biased and should be reviewed by experts with proven knowledge of the species.

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Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society	89	C		C-1			Attachment C-1: Parameters for species models should also include climatic and bioclimatic variables. Parameters should be reviewed for accuracy by scientific experts.
Defenders of Wildlife Sierra Club Friends of the Desert Mountains Natural Resources Defense Council Audubon California The Wildlands Conservancy California Council of Land Trusts California Native Plant Society	90	C		C-2			Species Habitat Models: We will provide further comments on species models once they have been reviewed by experts.

How to Submit Written Comments

Please submit comments on the DRECP Preliminary Conservation Strategy by **November 23, 2011**.

Please include the docket number “09-RENEW EO-01” in the subject line or first paragraph of your comments.

Those submitting comments electronically should provide them in either Microsoft Word format or as a Portable Document Format (PDF) and send them via email to [docket@energy.state.ca.us]. Please include your name or organization’s name in the file name.

Those submitting comments in paper format, please send them to:

California Energy Commission
Dockets Office, MS-4
Docket No. 09-RENEW EO-01
1516 Ninth Street
Sacramento, CA 95814-5512