

**DRAFT**

March 27, 2012

## MEMORANDUM

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**To:** DRECP Stakeholders  
**From:** Dudek/ICF  
**Subject:** DRECP Baseline Biology Report  
**Date:** March 27, 2012

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The attached Desert Renewable Energy Conservation Plan (DRECP) Baseline Biology Report represents the accumulation of biological data assembled to date for the DRECP and is organized in the following format:

- **Section 1** – Introduction;
- **Section 2** – Environmental Setting;
- **Section 3** – Physical and Ecological Processes;
- **Section 4** – Natural Communities and Biological Setting;
- **Section 5** – Species Considered for Coverage in the DRECP
- **Section 6** – Anthropogenic Land Uses and Influences; and
- **Section 7** – Conservation and Management Factors.

Some of the information included in the Baseline Biology Report has been previously distributed to stakeholders and included in the Framework Conservation Strategy Report (FCSR), the Preliminary Conservation Strategy (PCS), and in separate release of draft species profiles and models. Comments received on these earlier releases have been documented and appropriate changes are reflected in the Baseline Biology Report, as described below.

We understand that several items may be of particular interest to stakeholders, including:

- Status and incorporation of additional information;
- Consideration and response to independent science advisor (ISA) recommendations;
- Status of science review of species profiles and models; and
- Consideration and response to stakeholder comments on previously released information.

This memorandum discusses each of these items.

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## Status and Incorporation of Additional Information

Table 3.8-1 of the PCS listed the additional information identified as being available during the time frame of preparation and implementation of the DRECP and described how this information would be used. Table 1 provides an update indicating additional information received to date and how it is reflected in the Baseline Biology Report and the conservation planning process for the DRECP.

**Table 1**  
**Additional Data Summary**

| Data   | Status   | Uses for Identified Additional Data |                          |                      |                                       |
|--|--|-------------------------------------|--------------------------|----------------------|---------------------------------------|
|  |  | Species Profiles and/or Modeling    | Reserve Design           | Development Planning | Monitoring and/or Adaptive Management |
| <b>Identified Additional Data Sources</b>                                |  |                                     |                          |                      |                                       |
| Amargosa vole data   | Survey data slated to be collected in 2011, but data not available yet. Amargosa Valley is already known to have high endemism and biological value. Information most valuable for adaptive management and population monitoring. No update as of 3/14/12. | X                                   |                          |                      | X                                     |
| Audubon Important Bird Areas data  | Available and incorporated in DRECP database.  |                                     | ✓ (Post-Marxan analysis) |                      | X                                     |
| Bat Database Project   | Coordinating with CDFG on this item; database is in development. No update as of 3/14/12.  | X (?)                               | X (?)                    |                      | X                                     |
| BLM CDCA UPAs  | Hardcopy maps available for use in qualitative analyses only. No update as of 3/14/12.   |                                     | ✓ (Post-Marxan analysis) |                      | X                                     |
| BLM golden eagle nest locations  | Available and incorporated in DRECP database.  | ✓                                   | ✓                        |                      | X                                     |
| BLM National Landscape Conservation System                               | Available and incorporated in DRECP database.  |                                     | ✓                        |                      |                                       |
| BLM Rapid Ecoregional Assessment data for the Mojave and Sonoran deserts | Preliminary approach and data documentation has been reviewed. Coordinating with BLM on this item. Rapid ecoregional assessment results scheduled for release in 2012. No update as of   |                                     | X (?)                    |                      | X                                     |

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**Table 1**  
**Additional Data Summary**

| Data  | Status  | Uses for Identified Additional Data |                          |                      |                                       |
|---|---|-------------------------------------|--------------------------|----------------------|---------------------------------------|
|   |   | Species Profiles and/or Modeling    | Reserve Design           | Development Planning | Monitoring and/or Adaptive Management |
|   | 3/14/12.  |                                     |                          |                      |                                       |
| California ARSSC database                                 | This database is in preparation, but completion date unknown. No update as of 3/14/12.  | X (?)                               | X (?)                    |                      | X                                     |
| California Desert Connectivity Project data               | Available and incorporated in DRECP database. Final corridors connect habitat cores on DOD lands; therefore, land facet data used to develop the corridors being investigated.  |                                     | ✓ (Post-Marxan analysis) |                      | X                                     |
| California MSSC database                                  | This database is in preparation, but completion date unknown. No update as of 3/14/12.  | X (?)                               | X (?)                    |                      | X                                     |
| CalWEA priority wind resource areas (2011)                | Available and incorporated in DRECP database.   |                                     |                          | ✓                    |                                       |
| CDFG ACE-II modeling data                                 | Available and incorporated in DRECP database.   |                                     | ✓ (Post-Marxan analysis) |                      | X                                     |
| CEERT solar resource value data areas (2011)              | Available and incorporated in DRECP database.   |                                     |                          | ✓                    |                                       |
| CNPS literature review information                        | Available and incorporated in DRECP database.   | ✓                                   |                          |                      | X                                     |
| Desert bighorn sheep occurrence and occupied habitat data | Available and incorporated in DRECP database.   | ✓                                   | ✓                        |                      | X                                     |
| Desert tortoise occurrence information                    | Available and incorporated in DRECP database.   | ✓                                   | ✓                        |                      | X                                     |
| Mohave ground squirrel data                               | Potential corridor information obtained from CDFG. USGS model results anticipated 2012. Camera study data also anticipated in 2012. USGS draft model data results are not yet available but check-in comparisons of preliminary model outputs against consultant prepared expert and statistical models have been initiated to enable use of best available data. | ✓                                   | ✓ (Post-Marxan analysis) |                      | X                                     |

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**Table 1**  
**Additional Data Summary**

| Data   | Status  | Uses for Identified Additional Data |                          |                      |                                       |
|--|---|-------------------------------------|--------------------------|----------------------|---------------------------------------|
|  |   | Species Profiles and/or Modeling    | Reserve Design           | Development Planning | Monitoring and/or Adaptive Management |
| NWI mapping data updates   | Updated national wetland inventory mapping is proposed for the desert region, but a comprehensive update of the NWI data for the Plan Area is not anticipated to be complete by 2012. No update as of 3/14/12.              |                                     |                          |                      | X                                     |
| PRBO Conservation Science - Priority Areas for Breeding Birds within the Planning Area of the Desert Renewable Energy Conservation Plan (2012) | Considering this data in post-Marxan analysis.  |                                     | ✓ (Post-Marxan analysis) |                      | X                                     |
| Radar data for bird usage and migratory pathways   | 11/7/11 presentation to working groups. Based on the information provided in the presentations, unlikely these data (and the required analysis) will be available until DRECP implementation.                               |                                     |                          |                      | X                                     |
| Seeps and springs data from the Central Mojave Project and the National Park Service   | Hardcopy available (for use in qualitative analyses). NHD seeps and springs data are available for use in digital format for quantitative analyses. No update as of 3/14/12.  |                                     |                          |                      | X                                     |
| Transmission line data refinements, including Transmission Technical Group analysis  | Available and incorporated in DRECP database.   |                                     |                          | ✓                    |                                       |
| Vegetation mapping refinements   | Crosswalk from Initial Land Cover Map to NVCS classification implemented. West Mojave mapping area "A" data obtained and being used to inform reserve design process; remainder of the data to be available by end of 2012. | ✓<br>(Crosswalked land cover data)  | ✓ (Post-Marxan analysis) |                      | X                                     |
| <b>Ongoing Desert Research Projects</b>  |   |                                     |                          |                      |                                       |
| UC Davis: Use of habitat suitability models and  | Expected completion in summer 2014. No update as of 3/14/12.  |                                     |                          |                      | X                                     |

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**Table 1**  
**Additional Data Summary**

| Data  | Status  | Uses for Identified Additional Data |                          |                      |                                       |
|---|---|-------------------------------------|--------------------------|----------------------|---------------------------------------|
|   |   | Species Profiles and/or Modeling    | Reserve Design           | Development Planning | Monitoring and/or Adaptive Management |
| head-start techniques to minimize conflicts between desert tortoises and energy development projects in the Mojave Desert |   |                                     |                          |                      |                                       |
| UC Davis: Mapping habitat distributions of desert rare plants from optimized data   | Expected completion in December 2012. No update as of 3/14/12.  |                                     |                          |                      | X                                     |
| BMP Ecosciences: Population viability and restoration potential for rare plants near solar installations                  | Expected completion in August 2014. No update as of 3/14/12.  |                                     |                          |                      | X                                     |
| UC Santa Barbara: Cumulative biological impacts framework for solar energy projects in the California desert              | Expected completion of models and support tools in mid- to late-summer 2012 and downloadable data and tools in late winter or early spring 2013. No update as of 3/14/12. |                                     |                          |                      | X                                     |
| USGS: Potential habitat modeling, landscape genetics, and habitat connectivity for Mohave ground squirrel                 | USGS model data obtained, as noted above under Mohave ground squirrel data; landscape genetics and connectivity not yet available (as of 3/14/13).                        | X                                   | ✓ (Post-Marxan analysis) |                      | X                                     |
| Redlands Institute: Tortoise spatial decision support system  | Expected completion in February 2013. No update as of 3/14/12.  |                                     |                          |                      | X                                     |

**Notes:**

- ✓ = Data integrated and used.
- X = Identified use of data
- ? = No firm timeline for dataset acquisition; ability to incorporate these data into the Plan prior to permit issuance is uncertain.
- ARSSC = Amphibian and Reptile Species of Special Concern
- BLM = Bureau of Land Management
- CalWEA = California Wind Energy Association
- CDCA = California Desert Conservation Area
- CDFG = California Department of Fish and Game
- CEERT = Center for Energy Efficiency and Renewable Technologies
- CNPS = California Native Plant Society

- DRECP = Desert Renewable Energy Conservation Plan
- GIS = geographic information system
- MSSC = Mammal Species of Special Concern
- NHD = National Hydrography Dataset
- NVCS = National Vegetation Classification Standard
- NWI = National Wetland Inventory
- REAT = Renewable Energy Action Team
- UC = University of California
- UPA = Unusual Plant Assemblage
- USFS = U.S. Forest Service
- USFWS = U.S. Fish and Wildlife Service
- USGS = U.S. Geological Survey

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## Consideration and Response to ISA Recommendations

The *Recommendations of Independent Science Advisors for California DRECP* report (November 3, 2011) contained a variety of recommendations regarding the conservation planning process, a subset of which are related to information contained in the Baseline Biology Report. These recommendations are being considered and implemented as appropriate during development of the DRECP. Table 2 that follows provides a list of the ISA recommendations that are directly related to the information contained in the Baseline Biology Report, along with status of consideration and implementation of the recommendation.

**Table 2**  
**Treatment of ISA Recommendations in Baseline Biology Report**

| ISA Recommendation  | Treatment in Baseline Biology Report  |
|---|---|
| Identify Covered species – carefully craft a species list.<br><br>Should consider plant species that are on CNPS List 1B and 2.   | The 77 species proposed for regulatory coverage are discussed in detail in Section 5 of the Baseline Biology Report. The proposed Covered Species were identified through an iterative selection process by the DRECP stakeholders.   |
| Planning species – Consider supplementing with planning species, species for which authorizations are not necessary but can help in meeting plan goals. These could include area-limited, dispersal-limited, resource-limited and process-limited species, and/or keystone species. | The concept of planning species was not formally incorporated into the Baseline Biology Report and an “official” list of planning species has not been developed by the Stakeholders; however, a “long-list” of species considered for regulatory coverage includes at least a preliminary identification of species that may fill the role of a “planning species.” Planning species may be considered in the effects and conservation analyses, or in the long-term adaptive management strategy (e.g., target or focal species for monitoring and management). |
| Address natural communities at landscape level.   | Section 7 of the Baseline Biology Report addresses the relationship between natural communities and landscape factors, including the role of landscape factors such as connectivity in maintaining ecological processes. This discussion will guide setting conservation goals and objectives at the appropriate landscape, natural community, and species levels, with acknowledgement that these levels are interrelated.   |
| Map special habitat features, including certain geological and hydrological features should be mapped.  | The Baseline Biology Report incorporates spatial information for special habitat features, including wetlands, seeps, springs, washes, sand dunes, mines, and geological features such as playa, and cliffs and ridges. Appendix A, DRECP Baseline Biology Report Metadata, contains descriptions of the primary data layers used in the preparation of Baseline Biology Report.  |
| A range of maps should be used.   | The Baseline Biology Report includes maps as necessary to depict the baseline conditions in the Plan Area. These include  |

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**Table 2**  
**Treatment of ISA Recommendations in Baseline Biology Report**

| ISA Recommendation   | Treatment in Baseline Biology Report   |
|--|--|
|  | maps for ecoregions, physical geology, hydrology, groundwater, slope, aspect, surficial geology, topography, soils, habitat connectivity, and land cover (including natural vegetation communities). The Species Profiles (Appendix B) include maps showing range and occurrence information for the 77 proposed Covered Species. Appendix C, Species Habitat Model Results, contains occurrence data and modeled habitat maps for the 77 proposed Covered Species.  |
| Identify environmental gradients   | The Baseline Biology Report includes discussions of the natural communities and their patterns in the desert regions that are directly related to physical features and processes, which create the various environmental gradients in the Plan Area.  |
| Plan should invest in a comprehensive vegetation and special features map as soon as possible  | The most current available data are included in the land cover map for the Plan Area, as described in Section 4.1.1; see response above mapping of special features. Also see Appendix A, DRECP Baseline Biology Report Metadata, for descriptions of the primary data layers used in the preparation of Baseline Biology Report.  |
| Use list of CA Terrestrial Natural Communities and CA Vegetation Alliances   | Based on direction from CDFG, the Baseline Biology Report land cover map uses the National Vegetation Classification Standard (NVCS) hierarchical classification system, generally at the macrogroup or group level, and upon which the CA Terrestrial Natural Communities and CA Vegetation Alliances is based. See Section 4.1.1.  |
| Avoid over-reliance on CNDDDB data – presence only data source and on published species' range maps.   | CNDDDB data and published range maps (e.g., California Wildlife Habitat Relationships maps) were incorporated into the species profiles, as were several other occurrence data sources (e.g., BLM, USFWS, eBird, etc.). Each species profile (see Appendix B) provides a detailed discussion of occurrence and range information (including historical and recent occurrences) and, as applicable, the utility of the data is discussed (e.g., completeness of data). Any uncertainties regarding the range and distribution discussed for species, as applicable, both in the Distribution and Occurrences within the Plan Area and Data Characterization sections of the species profiles. |
| Use spatially explicit models and expert-based models for habitat suitability and species distributions. Utilize appropriate expertise for models. | Spatially explicit modeling was used for several of the proposed Covered Species (i.e., Maxent, 2009 USGS Desert Tortoise Model) for the Baseline Biology Report, as applicable (i.e., Maxent models were run for species with adequate occurrence data). Further, expert-based habitat models were developed for most of the proposed Covered Species. Proxy models were used for species where there was relatively complete information for the species' range and distribution in  |

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**Table 2**  
**Treatment of ISA Recommendations in Baseline Biology Report**

| ISA Recommendation  | Treatment in Baseline Biology Report   |
|---|--|
|   | the Plan Area (e.g., the carbonate plant species). Expert-based and Maxent models, as they appear in the Baseline Biology Report, were developed by the DRECP consultant team, but have been distributed for peer review by outside species experts. The feedback from the species experts will be incorporated into the final models that will be used included in the Plan.  |
| Consider sub-dividing the plan area into ecologically relevant subunits | For the Baseline Biology Report, the Plan Area was subdivided by ecoregion and ecoregion subsections based on the USFS National Hierarchical Framework adopted by the USFS Ecological Classification and Mapping Task Team (ECOMAP). See Section 2.1.1.  |
| Distribution of sensitive invertebrates should be determined.           | Sensitive invertebrates are not specifically addressed in the Baseline Biology Report, except to identify some that are closely associated with specific natural communities, such as species endemic to certain dune systems. No sensitive invertebrates are proposed for regulatory coverage under the DRECP.  |
| Use conceptual and quantitative models.                                 | In addition to creating expert-based and spatially explicit models and use of proxy models for species ranges and distributions, available conceptual ecological models were used for two of the species profiles (see Appendix B, Species Profiles): a stressor model for desert tortoise and a water management model for Yuma clapper rail. Generally, published or otherwise adopted ecological models are not available for the proposed Covered Species. Substantial species-specific information has been compiled related to the landscape, natural community, ecological process and threats and stressor factors that are used to construct conceptual models (see Table 7-2 in Section 7 of Baseline Biology Report), but the actual models have not yet been constructed. It is anticipated that such models (e.g., threats and stressor based models) will be developed as needed for the adaptive management strategy. |
| Review of existing conservation plans.                                  | The Species Profiles in Appendix B to the Baseline Biology Report contain summaries of existing conservation plans as they apply to the proposed Covered Species.  |

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## **Status of Science Review of Species Profiles and Models**

As part of the DRECP conservation planning process, external scientific review is being sought, including expert review of species profiles and models and convening a science advisory panel for a workshop in May 2012.

The expert review of species profiles and models is underway. Up to 40 independent reviewers are being engaged to review 77 species profiles and associated expert and statistical models. Reviewers may review more than one species. Reviewers include university and other scientists and professionals that are recognized species experts or taxonomic group specialists. The current list of reviewers reflects previous recommendations and input from stakeholders, subject to reviewers' willingness and availability to participate.

Participants on the science advisors' panel have yet to be identified. Panel members would receive written work products at least 2 weeks in advance of the panel. Draft work products expected to be reviewed by the panel include a draft recommended conservation strategy, draft biological goals and objectives, a draft recommended reserve design, and draft approaches to monitoring and adaptive management.

## **Consideration and Response to Stakeholder Comments on Previously Released Information**

During the course of the DRECP project, comments have been received from stakeholders that are catalogued as they are received. In summary, comments have been received on the following DRECP work products:

- FCSR;
- PCS;
- Proposed Covered Species profiles;
- Effects Analysis Memo;
- PCS Structure Memo;
- Species Modeling Memo;
- Subareas Memo; and
- Species Models.

Comments received from stakeholders on these work products were evaluated and integrated in the Baseline Biology Report and species profiles as noted in Table 3.

**Table 3**  
**Stakeholder Comments and Incorporation Status**

| Comment Date | Commenter Group | Commenter             | Subject Area/Source                    | Location/Chapter          | Section, Subsection, Paragraph, Sentence | Comment or Issue  | Applicable to Baseline Bio? | Response   |
|--------------|-----------------|-----------------------|--|---------------------------|--|---|-----------------------------|--|
| 5/31/2011    | Stakeholder     | Audubon, Garry George | Framework Conservation Strategy Report | II, Environmental Setting | Section II-2.C.5, page 74, paragraph 1   | Please describe aerial habitat and migratory pathways for migratory movements of birds, bats and insects  | Yes                         | The movement patterns of avian and bat species being considered for coverage are described in the species profiles for each species. Additionally, the species models and species occurrence database provide geospatial distribution of the species in the plan area. The effects analysis approach for wind, which has not been developed and is not relevant to the Baseline Biology Report, would develop the method for assessing effects to avian and bat species. |
| 5/31/2011    | Stakeholder     | Audubon, Garry George | Framework Conservation Strategy Report | II, Environmental Setting | Section II-2, page 42, paragraph 4       | We recommend inclusion of "Audubon California has identified 22 Important Bird Areas in the DRECP Boundary." with a footnote explaining the Important Bird Area program. <a href="http://web4.audubon.org/bird/iba/iba_intro.html">http://web4.audubon.org/bird/iba/iba_intro.html</a>  | Yes                         | This suggested revision has been incorporated in the Baseline Bio Report.  |
| 5/31/2011    | Stakeholder     | Audubon, Garry George | Framework Conservation Strategy Report | App A                     | A4.1                                     | Consider consulting Audubon Christmas Bird Counts and eBird. Limiting data to that published by a government agency is unduly restrictive.  | Yes                         | eBird data has been added to the Baseline Bio Report per this comment.   |
| 5/31/2011    | Stakeholder     | Audubon, Garry George | Framework Conservation Strategy Report | App A                     | A3.4, page 96, BUOW                      | In California, the CDFG is preparing a conservation strategy for burrowing owls (Burkett and Johnson 2007)<br><br>Can you get and provide this document to include in this document? Conservation recommendations will inform the DRECP.  | Yes                         | It does not appear that that document is available at this time.   |
| 5/31/2011    | Stakeholder     | Audubon, Garry George | Framework Conservation Strategy Report | App A                     | A3.4, page 98, BUOW                      | "Though populations remain stable in areas such as the Imperial Valley and throughout the western Mojave Desert," This is outdated. Please update with latest statistics on BUOW in Imperial Valley which show declines.  | Yes                         | This comment is no longer applicable to the Baseline Bio Report. Instead, the report states, "There were an estimated 5,600 pairs (range 3,405 to 7,775) in Imperial Valley during 1992 and 1993 (Gervais et al. 2008). This estimate dropped to 4,879 pairs in 2007 and 3,557 pairs in 2008."   |
| 5/31/2011    | Stakeholder     | Audubon, Garry George | Framework Conservation Strategy Report | App A                     | A3.6, paragraph 6                        | "Though there are only two nesting occurrences on record for this species within the Plan Area in the California Natural Diversity Database....."<br><br>BLM, USFW Service, County DEIRs, utilities, wind project applications have better and more up to date data on GOEA nesting in the Plan area and on species distribution. DFG CNDD is the weakest source. Since this is a REAT effort, this baseline could be compiled with cooperation, and this aerial habitat (GOEA nesting sites and surrounding flight areas) is a good example of why landscape level conservation alone will not be adequate for a conservation plan that includes renewable energy such as wind energy that directly and indirectly impacts aerial habitat. Dave Bittner can give nests in San Diego County. Tule Wind project in Easter SD County in DRECP boundary reported Eagle nests. Distribution map is inadequate and should be removed until updated.<br><br>p. 107 - Within Plan Area: Apparently stable (Remsen 1978)<br><br>USFW March 2010 Protocol has citations for decline of Eagle in western U.S., and Remsen 1978 is a very long time ago. This should be updated or status should be "unknown". | Yes                         | Occurrence data has been updated.  |

**Table 3**  
**Stakeholder Comments and Incorporation Status**

| Comment Date | Commenter Group | Commenter             | Subject Area/Source                    | Location/Chapter          | Section, Subsection, Paragraph, Sentence                           | Comment or Issue  | Applicable to Baseline Bio? | Response  |
|--------------|-----------------|-----------------------|--|---------------------------|--|---|-----------------------------|---|
|              |                 |                       |  |                           |  | Has USFW Service reviewed this document?<br><br>p.108 "There are no conservation actions in the Plan Area directed specifically at the golden eagle."<br><br>Eagle Conservation Plan is directed at Bald and Golden Eagle   |                             |   |
| 5/31/2011    | Stakeholder     | Audubon, Garry George | Framework Conservation Strategy Report | II, Environmental Setting | Section II.B.4, page 24, paragraph 1, "Owens River and Owens Lake" | "In recent years, the Los Angeles Department of Water and Power (LADWP) has been applying water and maintaining large ponds on the Owens Lake playa for dust control purposes."<br><br>We would recommend "Since 2000, the Los Angeles Department of Water and Power (LADWP.  | Yes                         | Text has been revised in the Baseline Bio Report.   |
| 5/31/2011    | Stakeholder     | Audubon, Garry George | Framework Conservation Strategy Report | II, Environmental Setting | Section II.C.4, page 71, paragraph 3                               | "Although fewer numbers of birds are likely to use these agricultural areas compared to the Imperial Valley (due to its proximity to the Salton Sea and substantially more agriculture)".<br><br>Please cite your reference for the conclusion that proximity to the Salton Sea is a factor in numbers of birds in agricultural areas or delete | Yes                         | Text has been revised to clarify, "Although fewer numbers of birds are likely to use these agricultural areas in the Palo Verde Valley compared to the Imperial Valley (due to the Imperial Valley's proximity to the Salton Sea and substantially more agriculture), the close proximity of the Palo Verde Valley to the Colorado River makes this area an important migration route and the agricultural fields in the area provide important habitat for migrant shorebirds when flooded, including large numbers of mountain plover, whimbrel (numbering up to 10,000 in the spring), and long-billed curlew (National Audubon Society 2011b)." |
| 5/31/2011    | Stakeholder     | CBD, Ileene Anderson  | Framework Conservation Strategy Report | App A                     | General  | Please include a discussion of and maps of Unusual Plant Assemblages (UPAs) as identified by BLM in the 1980 CDCA Plan.   | Yes                         | Unusual plant assemblage data is available and incorporated into the project database. This information is considered good background information as it pertains to the particular plant species being considered for coverage by the DRECP. This data however, is based on mapping and inventory information developed for the 1980 CDCA plan and is considered historical. The baseline biology report considers all information relative to species considered for coverage, including peer reviewed literature, agency documents, species occurrence databases, species models, range maps, and other relevant data and documentation.          |
| 5/31/2011    | Stakeholder     | CBD, Ileene Anderson  | Framework Conservation Strategy Report | App A                     | General  | A number of the species in Appendix A have federal recovery plans or management plans that include recovery strategies. These strategies should be included as goals for the DRECP and should be clearly laid out in the text of the document.  | Yes                         | Federal recovery and management plans are discussed in species profiles (Appendix B to the Baseline Bio Report)   |
| 5/31/2011    | Stakeholder     | CBD, Ileene Anderson  | Framework Conservation Strategy Report | App A                     | Figure A3.2-1  | There is more current distribution maps for the tortoise which need to be included.   | Yes                         | New occurrence data was included in the Baseline Bio Report.  |

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**Table 3**  
**Stakeholder Comments and Incorporation Status**

| Comment Date | Commenter Group | Commenter            | Subject Area/Source                    | Location/Chapter         | Section, Subsection, Paragraph, Sentence | Comment or Issue  | Applicable to Baseline Bio? | Response   |
|--------------|-----------------|----------------------|--|--------------------------|--|---|-----------------------------|--|
| 5/31/2011    | Stakeholder     | CBD, Ileene Anderson | Framework Conservation Strategy Report | App A                    | Section 55, Figure A3.2.2                | The USFWS – Desert Tortoise Recovery Office has a much more sophisticated model of tortoise threats/stressors, and although it is not yet comprehensive, it is more appropriate than this figure  | Yes                         | This figure was not readily available. More information is needed.   |
| 5/31/2011    | Stakeholder     | CBD, Ileene Anderson | Framework Conservation Strategy Report | I-4                      | General                                  | In each chapter that mentions communities, it starts off with forests, then woodlands and riparian. This seems awkward considering that most these communities are barely represented. Descriptions should be addressed from the most common and go to the least common.  | Yes                         | Natural communities are presented in alphabetical order to aide reader comprehension.                            |
| 5/31/2011    | Stakeholder     | CBD, Ileene Anderson | Framework Conservation Strategy Report | App A                    | Section A3.8                             | Clarity needs to be provided between the strategies for the listed population of peninsular bighorn sheep and desert bighorn  | Yes                         | Clarification has been added to the Baseline Bio Report  |
| 5/31/2011    | Stakeholder     | CBD, Ileene Anderson | Framework Conservation Strategy Report | App A                    | Section 59, paragraph 4                  | The 2008 Recovery Plan update is deeply flawed and has not been adopted. We strongly advise that the current existing final Recovery Plan (1994) goals be incorporated into this section and be used as a basis for desert tortoise recovery in the DRECP   | Yes                         | Both the 1994 and 2008 Recovery Plans are cited as data sources used in the desert tortoise species profile.     |
| 5/31/2011    | Stakeholder     | CBD, Ileene Anderson | Framework Conservation Strategy Report | 2, Environmental Setting | page 76                                  | The linkage information should also include the linkage work done by SCWildlands between Joshua Tree NP & MCAGCC <a href="http://www.scwildlands.org/reports/JT_TP_Connection.pdf">http://www.scwildlands.org/reports/JT_TP_Connection.pdf</a> as well as the recognition that the linkages will be further refined once the SCWildlands finishes their desert wide analysis (again another placeholder). | Yes                         | Clarification has been added to the Baseline Bio Report.   |
| 5/31/2011    | Stakeholder     | CBD, Ileene Anderson | Framework Conservation Strategy Report | App A                    | Figure S-6                               | BLM/CEC has much more data on golden eagle nests and territories.   | Yes                         | BLM data has been added to the species occurrence database.  |
| 5/31/2011    | Stakeholder     | CBD, Ileene Anderson | Framework Conservation Strategy Report | App A                    | Section 130, paragraph 1                 | The information from the MGS conservation strategy should be included in this section.  | Yes                         | Refer to Baseline Bio Report, Appendix B, the species profile, for information re the MGS conservation strategy. |
| 5/31/2011    | Stakeholder     | CBD, Ileene Anderson | Framework Conservation Strategy Report | 2, Environmental Setting | Map on p 27                              | Unclear the map. What do the priorities represent? What were the criteria? How does that relate to the DRECP?   | Yes                         | Removed priority labeling from the Figure in the Baseline Bio Report.  |
| 5/31/2011    | Stakeholder     | CBD, Ileene Anderson | Framework Conservation Strategy Report | App A                    | Figures S-2 through S-14                 | As mentioned with the plants above, occurrence maps are a factor of where someone has looked. Maps indicating habitat are more appropriate.   | Yes                         | Species models indicating habitat will be included in the Baseline Bio Report.                                   |
| 5/31/2011    | Stakeholder     | CBD, Ileene Anderson | Framework Conservation Strategy Report | App A                    | Section A3.9                             | The most recent version of the FTHL Rangewide Management Strategy is 2003.  | Yes                         | This reference has been updated in the Baseline Bio Report.  |
| 5/31/2011    | Stakeholder     | CBD, Ileene Anderson | Framework Conservation Strategy Report | App A                    | General                                  | Some of the plant communities seem wrong, and are likely a factor of the land cover map being used as a vegetation community map. For example, A1.2.4 Rocky Mountain Subalpine Mesic Spruce-Fir Forest and Woodland or A1.5.1 California Central Valley and Southern Coastal Grassland or A1.8.1 Mediterranean California Southern Coastal Dune   | Yes                         | TKW actually kept the Rocky Mtn veg in the crosswalk; the other two are no longer in the land cover map.         |
| 5/31/2011    | Stakeholder     | CBD, Ileene Anderson | Framework Conservation Strategy Report | App A                    | Figure S-5                               | USFWS has data on condor use of the DRECP areas   | Yes                         | USFWS Condor GPS DB - 2011 is now included in the species occurrence database.                                   |
| 5/31/2011    | Stakeholder     | CNPS, Greg Suba      | Framework Conservation Strategy        | 2, Environmental Setting | Section II.A.1, page II-2,               | Please consider our comment on semantics and the use of the phrase "vegetation community" unevenly throughout the draft document. "Vegetation" is a group of plants living  | Yes                         | All references to "vegetation community" have been changed in the Baseline Biology Report.                       |

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|--------------|-----------------|---|--|--------------------------|---|---|-----------------------------|---|
|              |                 |   | Report                                 |                          | paragraph 7   | <p>together in a place. "Community" is a group of organisms living together in a place. "Vegetation community" is redundant and is used as the predominant wording throughout the document to describe vegetation types, or vegetation. At times "vegetation type" is used. CNPS recommends adopting the convention used by Sawyer et al. (2008) in A Manual of California Vegetation and replace all uses of "vegetation community" with simply "vegetation" and/or "vegetation type(s)." "Plant community" would also work (and is sometimes used in the draft document, e.g., p. II-24).</p> <p>This redundancy is avoided in the definition of Natural Communities on p. II-3, by using "vegetation types" and represents the wording that should be employed throughout the rest of the document.</p>  |                             |   |
| 5/31/2011    | Stakeholder     | CNPS, Greg Suba   | Framework Conservation Strategy Report | 2, Environmental Setting | A.1, II-3, paragraph 6                                | <p>re: Definition of Initial Land Cover Map: edit definition to include "initial" as follows, "...that will be used in development of the initial DRECP framework conservation strategy." CNPS remains concerned that the value of the HCP/NCCP will be compromised by the lack of accurate information inherent in the Initial LandCover Map should the initial map remain the default information upon which we define targets for conservation and management efforts.</p> <p>Broad-scale vegetation types, such as the aggregate types developed as per the methods used to create the DRECP Initial Land Cover Map, may over- or underestimate the value of areas as target conservation habitat or development areas. The more detailed, quantitatively based vegetation maps being developed for the Western Mojave (and hopefully other areas to the east and south), and being revised to some degree for the Central Mojave, can more accurately differentiate suitable conservation / development areas and avoid the need for costly Plan reiterations.</p> | Yes                         | More detailed vegetation mapping from the Mojave Desert area has been included in the Baseline Bio Report to update the Initial Land Cover Map. |
| 5/31/2011    | Stakeholder     | CNPS, Greg Suba   | Framework Conservation Strategy Report | 2, Environmental Setting | Section II.B.4, page II-21, paragraph 1, 4th sentence | 4th sentence = typo. Change "sediments" to "sediment"   | Yes                         | Comment noted and typo fixed in the BBR.  |
| 5/31/2011    | Stakeholder     | CNPS, Greg Suba   | Framework Conservation Strategy Report | 2, Environmental Setting | Section II.B.4, page II-26, paragraph 1               | Not certain why "Natural Communities and Vegetation Types" is in section II.B.4 Hydrology? perhaps it should be its own section II.B.5?   | Yes                         | Organization revised for the BBR.   |
| 5/31/2011    | Stakeholder     | Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audobon, and Friends of the Desert Mountains; Kim Delfino and Jeff Aardahl | Framework Conservation Strategy Report | 2, Environmental Setting | Section II.B.4, page II-22, paragraph 2               | The description of the Salton Sea should include recent projections for the decline in the Sea beginning in 2017 after the mitigation water from the IID water transfer ends. Starting in 2017, the Salton Sea will become much more saline and the miles of shoreline will become exposed as the Sea recedes.  | Yes                         | Additional text has been added to the Baseline Bio Report to address this comment.  |
| 5/31/2011    | Stakeholder     | Defenders of Wildlife, NRDC, California   | Framework Conservation Strategy        | App A                    | Section 3.7   | Mohave Ground Squirrel: Unpublished BLM data based on live trapping studies in the Western Mojave conducted from 1974 through 1980 should be included in the species  | Yes                         | Data has been included in the new species occurrence database.  |

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|              |                 | Council of Land Trusts, California Audobon, and Friends of the Desert Mountains; Kim Delfino and Jeff Aardahl   | Report                                 |                          |  | account. Contact Shelley Ellis, BLM Biologist at 760-384-5426, or Dr. Larry LaPre. Site specific live trapping data for the Coso and Rose Valley area of Inyo County are contained in the FEIS for Coso Geothermal Development, published by Rockwell International under BLM contract (Field Ecology Technical Report on the Coso Geothermal Study Area-Survey of Small Mammals and Carnivores in the Coso Geothermal Study Area, July 1979, by Philip Leitner. Contact Jeff Aardahl for electronic copy of this report.<br><br>BLM published considerable information about this species in the West Mojave Plan and FEIS/EIR in January 2005 (See pages 3-144 through 3-169, and Appendix M-Mohave Ground Squirrel Background Data. Contact Jeff Aardahl for additional data on age and sex of individual Mohave Ground Squirrels trapped in the BLM 1980 field study. CONTINUED BELOW |                             |  |
| 5/31/2011    | Stakeholder     | Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audobon, and Friends of the Desert Mountains; Kim Delfino and Jeff Aardahl | Framework Conservation Strategy Report | 2, Environmental Setting | Section II.C.4                                     | Overall comment – there only reference to habitat used by desert bighorn sheep is on the “Rocky, Barren and Unvegetated Habitat Community.” Bighorn sheep utilize more diverse habitat that noted in the framework document.  | Yes                         | Text has been clarified in the Baseline Bio Report to make it clear that bighorn sheep do not only use rocky, barren, and unvegetated habitat. |
| 5/31/2011    | Stakeholder     | Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audobon, and Friends of the Desert Mountains; Kim Delfino and Jeff Aardahl | Framework Conservation Strategy Report | 2, Environmental Setting | Section II.C.4, page II-70, paragraph 3            | This report needs to include the more recent surveys by the Imperial Irrigation District for Burrowing Owl. The surveys by the Imperial Irrigation District show the burrowing owl population has dropped from about 5,600 pairs in the early 1990s to 4,879 pairs in 2007 and 3,557 pairs in 2008.   | Yes                         | Text in the Baseline Bio Report has been revised accordingly.  |
| 5/31/2011    | Stakeholder     | Pacific Coast and Central Valley Group, Chrissy Howell  | Framework Conservation Strategy Report | 2, Environmental Setting | Section II.C.4, page II-70                         | An additional reference is Howell, C. A. and W.D. Shuford 2008. Conservation Blueprint for Birds in the Imperial Valley. Report to Audubon California.  | Yes                         | We have not been able to locate this reference. Additional information is needed.  |
| 5/31/2011    | Stakeholder     | Pacific Coast and Central Valley Group, Chrissy Howell  | Framework Conservation Strategy Report | 2, Environmental Setting | Section II.C.4, page II-70                         | For the Shuford et al. 2000 reference to a report, they should also look at the Studies in Avian Biology monograph produced by Shuford in 2004 (that resulted from the 2000 report).  | Yes                         | We have not been able to locate this reference. Additional information is needed.  |
| 5/31/2011    | Stakeholder     | Pacific Coast and Central Valley Group, Chrissy Howell  | Framework Conservation Strategy Report | 2, Environmental Setting | Section II.C.3, page II-34, Initial Land Cover Map | What a lot of work to pull this all together! It would be great if they could provide a map the geographic extents of the sources of the veg/landcover data. I realize that the description in Table II-4 covers come of this, but I think it would be helpful to have it mapped out. If there were multiple sources of information for a given geography, which layers/data sets took precedence? Are there categories that some map sources overlook (e.g. riparian?). What is the source for the Urban data? There are a number of statewide and national sources that   | Yes                         | Chapter 4 of the baseline bio report describes the methods for developing and current status of the DRECP land cover map.                      |

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|              |                 |  |  |                           |  | are particularly good for this info. For rural/urban they may want to look at the Uplan data layer available from Jim Thorne at UC Davis.  |                             |   |
| 5/31/2011    | Stakeholder     | Pacific Coast and Central Valley Group, Chrissy Howell | Framework Conservation Strategy Report | 2, Environmental Setting  | Section II.C.4, page II-70               | Maybe I missed it, but where are "desert wash" habitat and species covered?  | Yes                         | Desert wash vegetation communities are now discussed in Section 4 of the Baseline Bio Report.   |
| 5/31/2011    | Stakeholder     | Pacific Coast and Central Valley Group, Chrissy Howell | Framework Conservation Strategy Report | 2, Environmental Setting  | Section, II.C.4, page II-45              | What is the basis for these maps? Are these from the initial land cover map?   | Yes                         | Clarification has been added to the Baseline Bio Report.  |
| 5/31/2011    | Stakeholder     | Pacific Coast and Central Valley Group, Chrissy Howell | Framework Conservation Strategy Report | 2, Environmental Setting  | Section II.C.4, page II-63               | "Small 1974" is cited too often. There are other more recent citations. Also the "Birds of N. America" species accounts should be consulted when discussing the preferences of individual species.   | Yes                         | No change has been made to the Baseline Bio Report in response. Small (1974) provides useful general information. See added Section 5 of the report for a more complete review of individual species, which references BNA accts where appropriate. |
| 5/31/2011    | Stakeholder     | Pacific Coast and Central Valley Group, Chrissy Howell | Framework Conservation Strategy Report | 2, Environmental Setting  | Section II.C.4, page II-45               | Scientific names for birds are missing. This is a recurring issue throughout this chapter.   | Yes                         | Scientific names added. Referenced the first time species is mentioned, then just the common name is used.  |
| 5/31/2011    | Stakeholder     | Pacific Coast and Central Valley Group, Chrissy Howell | Framework Conservation Strategy Report | 2, Environmental Setting  | Section II.D.1, page II-90               | More meta-data are needed for this map. What source was used if there were multiple sources of information in a given area? Why didn't they use a standard/existing landcover map – especially for the sources bulleted in the middle of page II-88)? Or is that what they did, but then updated it? | Yes                         | Section 4 includes methods for developing the land cover map  |
| 5/31/2011    | Stakeholder     | Pacific Coast and Central Valley Group, Chrissy Howell | Framework Conservation Strategy Report | 2, Environmental Setting  | Section II.D.1, page II-90               | For Figure II-7: did this all come from one source or from the composite? Are the "unspecified lands" the same as privately owned? For rural/urban they may want to look at the Upland data layer available from Jim Thorne at UC Davis.   | Yes                         | Section 4 includes methods for developing the land cover map. No longer "unspecified lands."  |
| 5/31/2011    | Stakeholder     | Pacific Coast and Central Valley Group, Chrissy Howell | Framework Conservation Strategy Report | 2, Environmental Setting  | Section II.C.4, page II-63               | Western Yellow-billed Cuckoos are also found in riparian habitat along the Colorado River. They are a state species of special concern and a candidate for federal listing.  | Yes                         | Section 5 is now the only section where this species is mentioned. It is actually endangered in CA and their distribution is discussed, including recognition that it is found along the CO River.  |
| 6/24/2011    | Stakeholders    | CNPS, Greg Suba  | Species profile                        | Cushebury Oxytheca        | Literature Review                        | CNPS provided literature to review for species profiles.   | Yes                         | Literature provided has been reviewed and incorporated as applicable.   |
| 6/24/2011    | Stakeholders    | CNPS, Greg Suba  | Species profile                        | Cushebury milk-vetch      | Literature Review                        | CNPS provided literature to review for species profile.  | Yes                         | Literature provided has been reviewed and incorporated as applicable.   |
| 6/24/2011    | Stakeholders    | CNPS, Greg Suba  | Species profile                        | Lane Mountain milk-vetch  | Literature Review                        | CNPS provided literature to review for species profile.  | Yes                         | Literature provided has been reviewed and incorporated as applicable.   |
| 6/24/2011    | Stakeholders    | CNPS, Greg Suba  | Species profile                        | Tripple-Ribbed milk vetch | Literature Review                        | CNPS provided literature to review for species profiles.   | Yes                         | Literature provided has been reviewed and incorporated as applicable.   |
| 6/24/2011    | Stakeholders    | CNPS, Greg Suba  | Species profile                        | Desert Cymopterus         | Literature Review                        | CNPS provided literature to review for species profiles.   | Yes                         | Literature provided has been reviewed and incorporated as applicable.   |
| 6/24/2011    | Stakeholders    | CNPS, Greg Suba  | Species profile                        | Barstow woolly-sunflower  | Literature Review                        | CNPS provided literature to review for species profiles.   | Yes                         | Literature provided has been reviewed and incorporated as applicable.   |
| 6/24/2011    | Stakeholders    | CNPS, Greg Suba  | Species profile                        | Mojave                    | Literature                               | CNPS provided literature to review for species profiles.   | Yes                         | Literature provided has been reviewed and incorporated as   |

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|              |                 |                                 |                                   | monkeyflower                         | Review                                   |  |                             | applicable.  |
| 6/24/2011    | Stakeholders    | CNPS, Greg Suba                 | Species profile                   | Owen's Valley checkerbloom           | Literature Review                        | CNPS provided literature to review for species profiles.   | Yes                         | Literature provided has been reviewed and incorporated as applicable.  |
| 11/27/2011   | Stakeholder     | Center for Biological Diversity | Preliminary Conservation Strategy | Section 2.2.2.2, page 2-28           | Table 2.2-2                              | Without a clearer description of the actual vegetation type, the table is misleading. For example, in the land cover type of Desert Scrub and Chaparral is purported to meet "all life history requirements" for desert tortoise, when in fact desert tortoise are not found in chaparral. Setting conservation goals for chaparral which could subsequently be included as a benefit desert tortoise conservation in the plan, would be of little benefit to desert tortoise conservation on the ground.  | Yes                         | This comment has been addressed in the Baseline Bio Report.  |
| 11/27/2011   | Stakeholder     | Center for Biological Diversity | Preliminary Conservation Strategy | Section 2.2.2.2, page 2-28           | Table 2.2-2                              | The table also simplifies the actual life history of some of the species. For example, the willow flycatcher is identified as having "all life history requirements" met in the "riparian" land cover. While the flycatcher does require riparian habitat for reproduction, it is migratory and relies on migratory pathways to get to its reproductive habitat. Potential impacts from collision with wind turbines could preclude them from even getting to their breeding habitat, so protection of their breeding habitat does not assure persistence of the species. In other words, not all of its life history requirements are actually met in the riparian land cover areas. In fact, this table could be misconstrued so easily, it should be substantially reworked or deleted. | Yes                         | This comment has been addressed in the Baseline Bio Report.  |
| 11/27/2011   | Stakeholder     | Center for Biological Diversity | Preliminary Conservation Strategy | Section 2.2.2.2, pages 2-30 and 2-31 | Table 2.2-3                              | Please clarify which the vegetation system is being used to identify these land cover and vegetation types   | Yes                         | This comment has been addressed in the Baseline Bio Report.  |
| 11/27/2011   | Stakeholder     | Center for Biological Diversity | Preliminary Conservation Strategy | Section 2.2.2.2, page 2-31           | Table 2.2-4, Objective 1.1               | In Objective 1.1 for all of the Land cover types, it states that ___acres of the land cover will be conserved. Clarification needs to be made about how that conservation will occur over and above the existing conservation. For example – dunes - there are dune systems within the DRECP boundaries that are conserved already including dunes in the Mojave National Preserve. These dunes should not be included in the conservation goal as part of any "amount of land conserved will be scaled in proportion to impacts" (pg. 2-25). Currently conserved land cover types cannot be used to as mitigation for development.  | Yes                         | This comment has been addressed in the Baseline Bio Report.  |
| 11/27/2011   | Stakeholder     | Center for Biological Diversity | Preliminary Conservation Strategy | App A-1                              |  | Additional biologically (and in some cases cultural) important areas have been identified in the BLM's 1980 Desert Plan for the CDCA, which have not been superseded by subsequent land use plan amendments. These areas should be included as metadata in this process. These areas include: Unusual Plant Assemblages (UPAs) Habitat Management Areas (HMAs) – many of which actually have existing management plans Special Areas (SAs) – also having existing management plans.  | Yes                         | These areas have been included in the species occurrence database. This data, however, is based on mapping and inventory information developed for the 1980 CDCA plan and is considered historical. The baseline biology report considers all information relative to species considered for coverage, including peer reviewed literature, agency documents, species occurrence databases, species models, range maps, and other relevant data and documentation |

Memorandum  
Subject: DRECP Baseline Biology Report

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| 11/27/2011   | Stakeholder     | Center for Biological Diversity | Preliminary Conservation Strategy | App B, Part 2, page 2 | Golden Eagle                             | Additional information on how eagles utilize the landscape needs to be included in modeling for and assessment of impacts for this iconic species. For example, scientific literature on this subject is clear - the presence of humans detected by a raptor in its nesting or hunting habitat can be a significant habitat-altering disturbance even if the human is far from an active nest (Richardson & Miller 1997). Regardless of distance, a straight-line view of disturbance affects raptors, and an effective approach to mitigate impacts of disturbance for golden eagles involves calculation of viewsheds using a three-dimensional GIS tool and development of buffers based on the modeling ( Camp et al. 1997; Richardson and Miller 1997). Golden eagles have also been documented to avoid industrialized areas that are developed in their territory (Walker et al. 2005). | Yes                         | Comment noted and addressed in Baseline Bio Report. |