

DRECP Framework Conservation Strategy Report

Comment Form

Commenter (Your Name)	Comment #	Comment Location:					Reviewer Comment (e.g., organization, content, grammatical comments)
		Chapter	Section #	Page #	Paragraph	Paragraph (from top)	
Garry George	1	III	Table III-17	18	1		Please add Owens Lake Conservation Plan currently in preparation by LADWP, and any draft plan of Salton Sea, and Eagle Conservation Plan
	2	III	Table III-9	22			Should Draft Eagle Conservation Plans be added? Should Avoidance should be one of the conservation actions of that? Are there other Conservation Plans with conservation actions that are not just landscape level but are conservation plans with conservation actions for conservation areas that should be included in the matrix on Covered Species?
	3	IV	IV	3	2		<p>“Objective 1-1.2. Apply avoidance and minimization measures to the design and siting of renewable energy projects to avoid or minimize impacts to the most sensitive natural communities and species habitats.”</p> <p>Does habitat include wildlife corridors and migratory pathways on the landscape and aerial levels?</p>
	4	V					Gen-tie construction and operation is not considered fully in the transmission section, although it is in the covered activities. Should operation of wind turbines should be considered as a Covered Activity as well as construction and maintenance?
	5	App A	BUO W	96			In California, the CDFG is preparing a conservation strategy for burrowing owls (Burkett and Johnson 2007) Can you get and provide this document to include in this document? Conservation recommendations will inform the DRECP.

	6	App A	BUO W				
	7	APP A	BUO W	98			<p>“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populations remain stable in areas such as the Imperial Valley and throughout the western Mojave Desert,” This is outdated.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.</p>

“Though there are only two nesting occurrences on record for this species within the Plan Area in the California Natural Diversity Database.....”
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.

p. 107 - **Within Plan Area:** Apparently stable (Remsen 1978)

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”.

Has USFW Service reviewed this document?

p.108 “There are no conservation actions in the Plan Area directed specifically at the golden eagle.”

Eagle Conservation Plan is directed at Bald and Golden Eagle

			GOE	10
8	APP A	A	A	3

and is a conservation action.

p.110- You cite studies in Mojave desert, and SD County by WRI documenting nests, but no occurrence on map.

Consult March 2010 USFW Protocol for additional citations on threats, stressors, and biology of Golden Eagle. Consult BLM Biologist Larry LePre on distribution in the desert.

This section needs a great deal of review and more current information.

Commenting on: (Clean version, track changes version) _____ May 4

SOUTHWEST WILLOW FLY

p. 179 para 2 Collisions with wind turbines during migration may be a threat as willow flycatchers have been recorded in migration on at least one wind project site (NextTera North Sky River Project, 2011, Kern County, DEIR) although not identified to subspecies.

p. 181 para 5 “Protection and management of the Kern River Preserve, California” should read “Protection and management of the Audubon Kern River Preserve, California” – this section could be reviewed by Dr. Barbara Kus of USGS.

p. 202 A4.1 Data Sources

Consider consulting Audubon Christmas Bird Counts and eBird. Limiting data to that published by a government agency is unduly restrictive.