

DRECP Framework Conservation Strategy Report

Comment Form – Center For Biological Diversity 4-27-11

Commenter (Your Name)	Comment #	Comment Location:					Reviewer Comment (e.g., organization, content, grammatical comments)
		Chapter	Section #	Page #	Paragraph	Paragraph (from top)	
Ileene Anderson (CBD)	1	1	1.A.1	1-4			Need to include AB2, signed into law in April 2011
CBD	2	1	1.B	1-5		3 rd bullet	The Center does not agree that the program goals should build on the RETI CREZ, because the CREZ were based on existing applications, many of which are in inappropriate areas of critical biological importance. Delete this goal.
CBD	3		1.B	1-6			This section that describes needs to also include a place holder for the western end of the Antelope Valley
CBD	4	1-4					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.
CBD	5	1	1.C.4	1-10	1		The REAT actually developed the species “filter” and the covered species just suggested improvements.
CBD	6	1	1.C.4	1-11		6 th bullet(special animals)	Clarify that State Fully Protected species are not covered species for state take permits
CBD	7	1	1.c.5	1-13	2	5 th bullet	Covered activities working group recommended that biomass be removed as a covered activity.
CBD	8	1	1.D.2.3	1-17			Need to include the section on fur-bearing mammals (California Code of Regulations, Title 14, section 460 for desert kit fox and badgers in particular.
CBD	9	1	1.D.3.4	1-19			WECO should be included.
CBD	10	2		11-27		Map	Unclear the map. What do the priorities represent? What were the criteria? How does that relate to the DRECP?

CBD	11	2		II-31, II-47- 56	Land cover maps	As we've discussed in the mapping group, these maps misrepresent what they are purported to represent, namely vegetation communities. As discussed also in the group, they are to be replaced by actual maps of plant communities. . As the ISA indicated a vegetation map is required, and in its absence strategies for "no regrets" should be the focus. The Draft Framework Conservation Strategy needs to address a "no regrets" strategy now so that it can be the basis for identifying areas that will not be included in the conservation scenario, which can be easily folded into the subsequent conservation scenario once the vegetation mapping has occurred. The "land cover map" is now apparently creeping into that role of vegetation map inappropriately. These maps should not be used as the basis for any decision-making, but as placeholders only
CBD	12	2			Table II-3	Similar comment as above – the "communities" and the acreages assigned to them misrepresent on-the-ground reality. The table should be used as a placeholder
CBD	13	2				Descriptions of the "communities" and the flora/fauna within them will also need to be redone once the more accurate mapping is completed.
CBD	14	2		II-76		The linkage information should also include the linkage work done by SCWildlands between Joshua Tree NP & MCAGCC http://www.scwildlands.org/reports/JT_TP_Connection.pdf as well as the recognition that the linkages will be further refined once the SCWildlands finishes their desert wide analysis (again another placeholder).
CBD	15	2		II-107	Type 2 lands	Type 2 lands should also include designated Wildlife Habitat Management Areas (WHMAs) by BLM, BLM designated Unusual Plant Assemblages (UPAs), BLM designated MUC Class "L", other conservation areas designated to preserve specific wildlife species and ecosystem processes, including the Mojave Ground Squirrel

							Conservation Area.
CBD	16	3	III.A	n/a	n/a	n/a	The term conservation area needs to be much more robustly defined. Presumably it includes areas established for conservation of species, ecological processes etc. It should include Unusual Plant Assemblages, critical habitat, and other previously identified unique biological (and cultural) features. The definition of a conservation area is key and needs to be clarified. The linkages must also be part of the conservation reserve system.
CBD	17	3	III.A	III-3		1 st bullet	While we support maximizing the conservation area size, we note that existing conservation investments already occur within the boundary of the DRECP. The document need to clarify that these existing investments (ie. National Park Service units, ACECs etc.), while apart of the conservation reserve system do not in and of themselves offset impacts of covered activities. Appropriate additional conservation in these areas may be apart of the conservation scenario, but additional acquisitions must be apart of the reserve assembly.
CBD	18	3	III.A	III-3		2 nd bullet	In the “ Maintain Connectivity ” section – Connectivity in light of climate change scenarios needs to be included here also
CBD	19	3	III.A	III-4		1 st bullet	In the “ Minimize Edge ” section – the notion of protecting “defined linear features ...such as streams, desert washes or desert riparian woodlands” fails to capture the issues that these particular linear features result from large watershed areas adjacent to the “linear feature”. In order to maintain these features, the functioning of the watershed needs to be retained. Therefore, it is not appropriate to only protect these linear features, but to also include the hydrological functions of the upland areas.
CBD	20	3	III.A	III-4		3 rd bullet	In the “ Target Areas with Limited Access ” section - With regards to road use in conservation areas – roads need to be evaluated for compliance with conservation goals. All roads in conservation areas may not be appropriate in order to achieve the conservation goals. If roads are determined to meet conservation goals, they need to then be manage for conservation purposes – not “thoughtfully managed”.

							Likewise, “Where public access is present, it may continue with appropriate stewardship of conservation lands” – the purpose of conservation lands is to protect rare, T&E species, rare habitats and communities. If public access is problematic, the conservation strategy should reduce or eliminate public access if the conservation area is being used for mitigation purposes. In other words, it should be managed for CONSERVATION stewardship, and public access should not trump conservation obligations regardless of land ownership. This concept is key and may require changes to the some public land agencies’ land management policies. For example, the BLM whose current mandate is multiple use, yet some BLM lands may be developed for a single use to accommodate renewable energy and some BLM lands may require the highest levels of conservation in order to achieve conservation goals. In both cases, these lands will no longer be “multiple use”.
CBD	21	3	III.A	III-4-5	4 th bullet		In the “ Buffer Urban and Rural Impacts ” section - We support the idea of providing physical distance between impacting uses and conservation areas. However, buffers are typically controversial. While we agree that buffers should be included within the conservation areas, the reality is that by identifying buffers as something different than conservation areas, the conservation level in buffers tend to get “watered down” and ultimately fail to provide the protection originally envisioned. Therefore we support eliminating buffers and instead including the idea that the conservation areas will have adequate configurations to provide protection from urban and rural impacts.
CBD	22	3	III.A	III-5	1 st bullet		In the “ Preserve Irreplaceable and Threatened Resources ” section - The whole conservation reserve system should protect these resources, not just the conservation areas.
CBD	23	3	III.A	III-7	Table III-1		Couple of issues: 1) reference to the definition of “protected land status” should refer to chapter 2 (and see above comments)

							<p>2) seems like all lands could benefit from restoration/enhanced management.</p> <p>3) Check w/BLM as per opportunity for permanent protection – in the past where projects have identified sensitive resources and avoided them, BLM regulations prevent these areas from being set aside to protect resources if they are outside of an already “protected” area.</p>
CBD	24	3	III-10			Table III-5	Plants conservation evaluation should not be based on occurrences only (primarily because all suitable habitat has not been surveyed for these species), but instead on suitable habitat.
CBD	25	3	III-11			Figure III-1	this map seems off...there is more suitable habitat based on the USGS habitat model, and it seems like there is definitely more habitat in the state and national parks than seem to be represented here. All DOD lands are “unprotected” for long-term conservation due to conflicts with military mission (and not just for desert tortoise conservation).
CBD	26	3	III-12			Figure III-2	This map needs to include more than just the MGS core areas. It should evaluate the whole range of the species and include the BLM designated MGS conservation area.
CBD	27	3	III-13-15			Figure III-3-5	The plant maps should include all habitat, not just occurrences for the reasons discussed above.
CBD	28	3	III-21			Table 3-8	<p>1) No Draft West Mojave Plan is available.</p> <p>2) The Flat-tailed horned lizard Rangelwide Management Strategy does not address California condor conservation.</p>
CBD	29	3	n/a	n/a	n/a	n/a	<p>Issues not included in the Draft Conservation Area Design and Assembly chapter that need to be included:</p> <ul style="list-style-type: none"> • Include well-distributed conservation of species <i>across their range</i>. • Highly fluctuating populations need adequate protected habitat to allow for natural boom-bust population dynamics to continue to occur. This dynamic needs to be captured in the reserve design, especially in light of climate change.

							<ul style="list-style-type: none"> Peripheral populations need top priority for protection, because of all the genetic benefits they provide to species as a whole. Needs to assure a <i>net gain in habitat values</i> occurs for species, and a <i>net gain in population sizes</i> for current TES species.
CBD	30	4	IV-9			Goal 2-7	<p>Add an additional Objective 2-7.3. Protect all sand transport corridors</p> <p>This protection is necessary in order to fully protect the dunes ecosystem and has been a failure of an HCP in the area.</p>
CBD	31	4	IV-11			Objective 3-10.1.1	Facilities should be sited out of occupied desert bighorn sheep habitat throughout bighorn range which includes the Colorado desert too.
CBD	32	4	IV-11			Objective 3-10.1.2	Facilities should not be placed in movement corridors which will cause further fragmentation of the habitat.
CBD	33	4	IV-12			Goal 3-10.2.1	Add Objective 3-10.2.3 Re-establish historic linkages that have been compromised by anthropogenic development. Install land bridges to facilitate movement, maintain genetic diversity and climate change adaptation strategy.
CBD	34	4	IV-15			Goal 3-12.1	Add Objective 3-12.1.8 Protect shallow aquifer that these plants rely on from groundwater pumping
CBD	35	4				Goals for Plants	Add objective to establish off-site seed-bank storage
CBD	36	Apdx A	n/a	n/a		n/a	Please include a discussion of and maps of Unusual Plant Assemblages (UPAs) as identified by BLM in the 1980 CDCA Plan.
CBD	37	Apdx A					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
CBD	38	Apdx A					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.
CBD	39	Apdx A	48			Figure A3.2-1	There is more current distribution maps for the tortoise which need to be included.
CBD	40	Apdx A	49			Figure 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.
CBD	41	Apdx A	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
CBD	42	Apdx A	59			4 th paragraph	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
CBD	43	Apdx A	92			Figure S-5	USFWS has data on condor use of the DRECP areas
CBD	44	Apdx A	104			Figure S-6	BLM/CEC has much more data on golden eagle nests and territories.
CBD	45	Apdx A	130			1 st paragraph	The information from the MGS conservation strategy should be included in this section.
CBD	46	Apdx A	130	A3.8			Clarity needs to be provided between the strategies for the listed population of peninsular bighorn sheep and desert bighorn
CBD	47	Apdx A	150	A3.9		Recovery Planning	The most recent version of the FTHL Rangewide Management Strategy is 2003.
Commenting on: (Clean version, track changes version) _____							