



6/27/2011

To: Scott Flint, DRECP  
Kim Delphino/Rick Miller, DRECP Co-chairs Covered Species Working Group  
June Collins, Dudek  
From: Ileene Anderson, Center for Biological Diversity  
cc: Covered Species Working Group

**RE: Comments on DRECP\_Species Modeling Approach Memo\_6 14 11.pdf**

Thank you for the opportunity to submit comments on the modeling approach. We believe that the proposed approach is not consistent with the recommendations of the Independent Science Advisors (ISA) and will not achieve the stated goals of the DRECP. Our specific comments are noted below:

The ISA clearly recommend that statistical (empirical) modeling be implemented. The benefits of this approach are particularly appropriate for the DRECP because it will be dealing with species on the move as climate change continues and statistical modeling enables projections of “future occurrences in places where the correlated environmental features are projected to be present in the future.” (ISA at 54). The ISA also recommends that “consensus modeling” be applied where more than one statistical species distribution model is applied to the data and the subsequent areas of overlap evaluated. In addition they recommend that the uncertainty be evaluated.

The memo states that statistical modeling was rejected because of “technical difficulties, existing data limitations, and lack of transparency”. It is unclear what the technical difficulties are although the ISA also anticipated that the necessary “expertise is generally lacking at environmental consulting firms that prepare HCPs, NCCPs, and NEPA and CEQA documents” for statistical modeling. It urges the DRECP to “*tap appropriate expertise for the application of any scientific models, because learning-while-doing is inefficient and error-ridden.*” [Emphasis original] (ISA at 54). While we agree that data for some species may preclude the use of statistical modeling, for numerous species being considered as covered species, there are adequate data sets (more than 30 data points) available to implement a statistical model.

Furthermore the ISA recommends “cautious use” of expert-opinion models only when there are inadequate data points or an underlying bias (ISA at 55). The memo seems to suggest that expert-opinion models will be the primary modeling tool, which is at odds with the ISA recommendations.

While the Memo identifies that climate change modeling is not apart of this memo, but we urge the DRECP to focus on this important issue in the subsequent modeling efforts because  
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the success of the plan will depend on it. While we recognize that the modeling science is imperfect to date, we strongly request that the ISA recommendations of Section 3.5 (ISA at 59-60) be incorporated into the modeling effort. This important “glimpse at the future” is key to the success of the DRECP.

As demonstrated in the mapping subgroup meeting, the Land Cover data which is presented on the Land Cover map, is inaccurate. Using these data as a basis for the modeling upon which conservation and development scenarios are based will result in flawed outputs, likely dooming the DRECP goals for conservation. The modeling output should be used for decision-making purposes only *after* the updated vegetation mapping has been integrated and refined.

Lastly while the models are being developed, modeling experts need to be retained to develop and apply the most appropriate and cutting edge models, including those on the ISA. We also urge that the output from the models be reviewed not only by the REAT and the “Science Expert”, but that numerous experts for each species and/or the ecological niche (ex. eolian processes) are retained for the review.

Feel free to contact me with any questions.