

DRECP Framework Conservation Strategy Report

Comment Form_CNPS

CNPS Comments	Comment #	Comment Location:					Reviewer Comment (e.g., organization, content, grammatical comments)
		Chapter	Section #	Page #	Paragraph	Paragraph (from top)	
Greg Suba, California Native Plant Society	1	2	A	II-1	2	2	The last sentence refers to, "companion DRECP environmental document." Is this referring to Appendix B? or something else we already have received, or is it something still to come?
	2	2	A.1	II-2	7		<p>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 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 <i>A Manual of California Vegetation</i> 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>
	3	2	A.1	II-3	6	6	re: Definition of Initial Land Cover Map : edit definition to include " <i>initial</i> " as follows, "...that will be used in development of the <i>initial</i> DRECP framework conservation strategy."

CNPS Comments	Comment #	Comment Location:					Reviewer Comment (e.g., organization, content, grammatical comments)
		Chapter	Section #	Page #	Paragraph	Paragraph (from top)	
							<p>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>
	4	2	II.B.3	II-10	1	1	<p>re: "[surficial geology] will be critical for maintaining and restoring native communities."</p> <p>The restoration of desert vegetation occurs on the order of many decades to <i>centuries</i> (i.e., well beyond the term of the DRECP) because of the "strong dependence...on surficial geology" noted in the report, especially in locations where restoration of desert pavements and/or cryptogamic crusts would be necessary. The DRECP framework strategy should mention this condition when referencing restoration of desert native communities as a conservation strategy in order to clarify timeframes and avoid overly-optimistic expectations of the reliability of desert "native community restoration" as a conservation or mitigation measure.</p>
	5	2	II.B.4	II-21	1	1	4th sentence = typo. Change "sediments" to "sediment"

CNPS Comments	Comment #	Comment Location:					Reviewer Comment (e.g., organization, content, grammatical comments)
		Chapter	Section #	Page #	Paragraph	Paragraph (from top)	
	6	2	II.B.4	II-26	1	3	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?

re: "While current and fine..., **many regional and landscape-scale analyses can be conducted with mid-scale resolution land cover data, as is available in the DRECP Initial Land Cover Map...**"

Examples of types of "regional and landscape-scale analyses" being referred to here would be useful in clarifying to what extent the Initial Land Cover Maps will be used. Much of our concerns are based on lack of clarity regarding what types of decisions we will be making using the Initial Land Cover Map, how those initial decisions will be re-analyzed when less broad-scale and more spatially-accurate maps are available, and who will perform the re-analyses? e.g., of vegetation distributions, and habitat / species distribution models using the updated maps?
 re: "Therefore, the DRECP...will rely on ...Initial Land Cover Map...until a comprehensive alliance-level vegetation...layer is available."

7	2	II.B.4	II-26	2	3
---	---	--------	-------	---	---

8	2	II.B.4	II-26	2	3
---	---	--------	-------	---	---

This would be the place to state what happens once the finer-scale vegetation layer is available. For example, "At which time models will be re-run, results analyzed, and changes integrated into the conservation strategy by DRECP consultants and then subject to review by independent science experts."

CNPS Comments	Comment #	Comment Location:					Reviewer Comment (e.g., organization, content, grammatical comments)
		Chapter	Section #	Page #	Paragraph	Paragraph (from top)	
							<p>Edit the last sentence as follows: <i>"Additional existing...and ongoing land cover mapping will be incorporated into the land cover database, and integrated into conservation strategy decisions, as the new mapping data becomes available."</i></p>
	9	2	II.B.4	II-26	3	4	<p>To clarify that new information will not only be added to a list, but will also be used in decision making. re: "Additional existing smaller scale land cover maps are...for focused conservation planning decisions and land cover quantification when feasible,...."</p>
	10	2	II.B.4	II-26	3	4	<p>There are desert vegetation types that are themselves rare. Within the Mojave Desert there are over 100 rare (Natural Heritage Rank S1-S3) vegetation Alliances and Associations, we provide a list of these in spreadsheet attached to our comments. These rare types occur in smaller stands, sometimes on the scale of 2 acres or less. These rare types, especially those recognized with a State Heritage Rank of S1 or S2, must be addressed in conservation planning decisions regardless of what is considered "feasible." re: "...that can be used to inform many regional and landscape-scale conservation planning decisions,...."</p>
	11	2	II.C.3	II-37	1	1	<p>see comment #7.</p>
	12	2	II.C.3	II.37	2	2	<p>BLM's Unusual Plant Assemblages (UPA's) should be added to the Supplemental Land Cover Data Sources.</p>

CNPS Comments	Comment #	Comment Location:					Reviewer Comment (e.g., organization, content, grammatical comments)
		Chapter	Section #	Page #	Paragraph	Paragraph (from top)	

A map of BLM UPAs is provided on p. 52 of the Vegetation Element of the 1980 BLM CDCA Plan (Part I, Chapter 3, pp. 41-52), and general descriptions including sensitivity classifications, and Management Options are included in the CDCA Report's Appendix X (Appendix X, Part 4 (pp. 109-115)).

Please find a copy of the map and Appendix X attached with our comment form.

re: "...identify which natural communities and species are *already well protected by existing ownership and land management activities (Types 1,2, and 3),....*"

CNPS feels that a GAP analysis that identifies species and natural communities occurring on Type 3 lands as "already well protected" by existing ownership / land management activities will overestimate the protected areas in the plan area. For example, several renewable energy project applications, approved and pending, and solar energy zones (SEZ's) occur on Type 3 lands (e.g., the Ivanpah and Calico projects, the Iron Mountain and Pisgah SEZs) and represent examples of places that cannot be considered as "already well protected" based on land management practices and planning processes.

We feel Type 3 lands must be differentiated from Type 1 & 2 lands for the purposes of GAP analysis.

13 2 II.D.3.2 II-108 2 2

CNPS Comments	Comment #	Comment Location:					Reviewer Comment (e.g., organization, content, grammatical comments)
		Chapter	Section #	Page #	Paragraph	Paragraph (from top)	
							re: "Information on species...will inform the conservation reserve system design process."
	14	3	III.A	III-2	1	2	<p>CNPS will be submitting additional information regarding candidate Covered / Planning plant taxa in response to the recently distributed review list (<i>Working Review of DRECP CS List 25May2011_bh_saf.xlsx</i>).</p> <p>re: <i>"For example, at a small scale, conservation areas must contain the microhabitats and other resources necessary for local species populations to survive."</i></p> <p>CNPS agrees with this principle. In order to achieve conservation of these small scale features, it is necessary to know where small scale microhabitats and other resources occur across the planning area. This underscores the necessity of developing a land cover layer that resolves finer-scale features (e.g., like the MDEP Special Features layer) that the current broad-scale land cover map does not resolve. Section 3.1.2 of the DRECP Independent Science Advisors Recommendations report (p.50) addresses the need to include special features in the plan's land cover map, "to identify spatially explicit units for conservation which would otherwise not be shown" on the land cover map.</p>
	15	3	III.A	III-2		2	

CNPS Comments	Comment #	Comment Location:					Reviewer Comment (e.g., organization, content, grammatical comments)
		Chapter	Section #	Page #	Paragraph	Paragraph (from top)	
							re: "identify resource that are already protected by existing ownership and land management activities (types 1,2, and 3)...."
	16	3	III.B.1	III-6	3	4	see comment #13.
	17	3	III.B.2	III-8	1 (and Table III-2 footnote)	1	This preliminary analysis is useful for informing discussion of methods to be used in GAP analysis and planning, but the narrative should state explicitly that decisions regarding protection of species and natural communities based on these data would be premature since both data processing procedures (as stated in Table III-2 footnote), and new mapping information may result in revisions to these draft calculations. Total acreage and locations of natural communities will most likely change. re: "Although this analysis...lower survey effort."
	18	3	III.B.2	III-10	1	1	This statement, though correct, is incomplete. It is equally true and relevant that plant occurrences can be underrepresented on lands with lower protection status and low survey effort. The narrative should be amended to clarify this point. CNPS agrees that the types of conservatin measures and actions described in this chapter do not represent a "specific DRECP conservation strategy" because most of the objectives are general and vague. We will work with the Stakeholder Committee to ensure the development of more specific objectives.
	19	4	IV	IV-1	2	2	
	20	4	IV	IV-4	1&2	1&2	typo: Objectives 1-3.1 and 1-3.2 are the same.

CNPS Comments	Comment #	Comment Location:					Reviewer Comment (e.g., organization, content, grammatical comments)
		Chapter	Section #	Page #	Paragraph	Paragraph (from top)	
	21	4	IV	IV-7	2	2	Objective 2-4.2: is there a conservation advantage to specific faunal species to protecting "non-native grassland community vegetation types (introduced upland vegetation-forbland)"? If not, we do not understand the need to identify such areas as high conservation priority sites.
	22	4	IV	IV-15	7	8	Objective 3-12,13,14.2.2: Implementation of this objective <i>per se</i> must not be considered a contribution to the recovery of target plants unless / until the expansion and persistence of experimental populations is proven successful.

Commenting on: draft DRECP Conservation Framework Strategy