

DRECP Framework Conservation Strategy Report

Comment Form

Committer (Your Name)	Comment #	Comment Location:					Reviewer Comment (e.g., organization, content, grammatical comments)
		Chapter	Section #	Page #	Paragraph	Paragraph (from top)	
Kim Delfino and Jeff Aardahl on the behalf of Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audubon, and Friends of the Desert Mountains	8	II		94		1	<p>Bureau of Land Management (BLM): Clarify that BLM manages publically owned lands. BLM is not the landowner.</p> <p>Department of Defense (DOD): Most of lands within DOD installations are public lands withdrawn by Congress for exclusive use by DOD agencies. In these situations, DOD does not the landowner.</p>
Kim Delfino and Jeff Aardahl on the behalf of Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audubon, and Friends of the Desert Mountains	9	II		105		Table 2-11	Type 1 Lands, BLM: National Natural Area classification needs verification. BLM has designated various Natural Areas in the planning area (e.g., Afton Canyon Natural Area, Desert Tortoise Research Natural Area, Amboy Crater Natural Area, Rainbow Basin Natural Area, and Amargosa River Natural Area). These areas have been designated as Areas of Critical Environmental Concern. However, their Type 1 classification is questionable unless the lands have been withdrawn from use associated with land and mining uses. Request BLM to determine if public lands in these areas have been withdrawn from uses associated with rights of way and mining laws. If they haven't been withdrawn then their classification needs to be adjusted to Type 2 because they have been designated as Areas of Critical Environmental Concern by BLM.
Kim Delfino and Jeff Aardahl on the behalf of Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audubon, and Friends of the Desert Mountains	10	II		105		Table 2-11	Type 2 Lands, BLM: Wilderness Study Areas should be included in this category because they are managed under protective provisions of FLPMA pending Congressional action on wilderness designation.

Kim Delfino and Jeff Aardahl on the behalf of Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audubon, and Friends of the Desert Mountains	11	II		105	Table 2-11	Type 2 lands, BLM: “Natural Preserve” classification doesn’t apply. Type 2 lands, BLM: “Wildlife Area” classification may not apply – please check with BLM. If this classification is meant for Wildlife Habitat Management Plan Areas, they should be Type 3 lands because they have no regulatory or statutory protection from incompatible land uses.
Kim Delfino and Jeff Aardahl on the behalf of Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audubon, and Friends of the Desert Mountains	12	II		107		Type 3 lands, BLM: There is some uncertainty of these lands remaining in a relatively undeveloped status. If they are open to multiple uses under federal land and mining laws they will continue to be subject to development. Examples are the numerous large-scale solar, wind and geothermal power projects, transmission lines and other facilities authorized by BLM under rights of way as per FLPMA, Title V. These lands may be more appropriately categorized as Type 4 (unprotected). Please discuss with BLM and other agencies on the planning team and revise if necessary.
Kim Delfino and Jeff Aardahl on the behalf of Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audubon, and Friends of the Desert Mountains	13			108	II.D.3.2	Application of Protected Area Classification to the Conservation Strategy: Communities and species falling into Type 3, and possible Type 2, public lands under BLM management are not “well protected.” Suggest revising and indicating that Type 1 lands are well protected, Type 2 lands are moderately protected in some cases, and that Type 3 lands are not protected. As noted above, please determine if Type 3 lands should be placed in Type 4 (unprotected).

Commenting on: (Clean version, track changes version) __May 4, 2011 Draft