

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	20	III	A	1	1		Conservation design and principles: For lands managed by public agencies, such as BLM and DOD, effective conservation outcomes will necessitate that appropriate and lasting conservation assurances on certain lands managed by BLM and DOD that contain significant natural communities and species are part of the planning strategy. Please determine to what extent such assurances can and will be provided so that this aspect of the planning strategy can be verified. In addition, the planning strategy involving BLM and DOD lands should specify the types of assurances that can be applied and their duration or longevity.
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	21	III	B.1	6	1	2	Gap Analysis - Methods: The accuracy and reliability of the Gap Analysis require that the actual degree of lasting protection for Type 1, 2 and 3 protection categories be reviewed and revised, as necessary, especially for public lands managed by BLM. Many of the Type 3 public lands under BLM management have little or no long-term protection and may more appropriately fall under the Type 4 or unprotected land status. Although BLM lands in the California Desert Conservation Area that are subject to multiple uses are managed under "multiple use, sustained and maintenance of environmental quality" provisions of FLPMA, those provisions, as implemented by BLM, do not ensure long-term integrity of natural communities.
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	22	III	C	17			General comment on Existing Conservation Planning Documents: A summary of "conservation actions" contained in 28 existing planning documents for the 14 currently covered species is presented. It is essential that the planning team include actual conservation actions that directly conserve the covered species and their habitats. The list contains numerous plans, many of which may be more appropriately categorized as impact mitigation and take minimization strategies, which are not necessarily conservation oriented. Also, plans, by themselves, should not

						be considered conservation actions. Some plans may contain recommended conservation actions, but until such actions are implemented, the plans cannot be considered effective. Please provide a more accurate definition of what constitutes a “conservation action” and carefully examine the 28 existing plans and extract only actual conservation actions they contain.
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	23	III	C	18		Table III-7 Status of Conservation Documents: Some of the documents listed are not plans, but rather environmental analyses of unspecified plans (e.g., China Lake NAWS EIS; Supplemental Final EIS, National Training Center, Fort Irwin). Please identify the actual plan rather than the environmental document that assesses the effects of a plan. As in the comment above, please carefully determine whether or not a reported “conservation plan” should be more appropriately categorized as an impact mitigation and take minimization plan.
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	24	III	C	22-30		Table III-9 (Species): Conservation Actions: In describing conservation actions, please differentiate between actual actions, impact mitigation and take minimization, and plans. Only some of the actions are conservation oriented. Examples from the list that are actual conservation actions include “Permanently remove bullfrogs and other exotic species that prey upon or displace listed species” and “Close non-essential or redundant routes, especially within tortoise conservation areas and set a minimum goal of “no net gain” of roads in tortoise conservation areas.” Others are impact mitigation and take minimization oriented, such as “Relocate desert tortoises out of harm's way before activities likely to create direct impacts” and “Implement worker education and other procedures in accordance with the 2003 Flat-Tailed Horned Lizard Interagency Coordinating Committee recommendations.” Other actions include development of plans which may or may not contain actual conservation actions, such as “Perform habitat assessments (in priority order established by Sonoran Bird Conservation Plan)” and “Work with tribes to develop conservation plans and strategies to realize the considerable potential for conservation and recovery on tribal lands.”

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Commenting on: (Clean version, track changes version) __Draft Framework Conservation Strategy, May 4, 2011