

## 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	2 5	III	III.A.	III-4	1		In the <b>“Minimize Edge”</b> 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 may not be appropriate to only protect these linear features, but to also include the hydrological functions of the upland areas.
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	26	III	III.A.	III-4			In the <b>“Target Areas with Limited Access”</b> 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".
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	27	III	III.A.	III-4			In the " <b>Buffer Urban and Rural Impacts</b> " 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
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	28	III	III.A.	III-5			There is no discussion of the need to protect and conserve sand sources.
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	29	III	III.B.				The overall Preliminary Gap analysis is extremely cursory, has flawed classifications re: land types (see comments from Jeff Aardahl) and is very limited in terms of what resources were examined. It is unclear what the point of this gap analysis is given the current lack of any clear and specific biological goals and objectives for natural communities and most species. It is unclear what the importance is regarding the

Mountains						acreage and percentage of habitats in the 4 land types.
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	30	III.	III.B. 2	p. III-7		The Mohave ground squirrel core habitat and known populations should also include key linkage areas and historic range to accommodate population fluctuations.
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	31	III	III.C	pp.III-17-30		The Conservation Actions section is confusing as it includes a number of references to documents that are only mitigation documents and/or actions that are not going to “provide for conservation.” Instead, many actions are simply education, surveys or just mitigations – none of which actually contributes the recovery of a species. This section needs significant work to actually identify real conservation actions for specific species and habitat areas.

Commenting on: (Clean version, track changes version) \_\_\_\_\_ May 4, 2011\_\_\_\_\_