

## DRECP Framework Conservation Strategy Report

### Comment Form

Commenter (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	39	IV	1-1.2	3			The <u>most sensitive natural communities and species habitats</u> should be clearly avoided. Allowing projects to be sited in these areas by applying impact minimization measures will not ensure their continued function and protection.
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	40	IV	1-2	3			<p>Under Protect and Maintain Ecosystem Processes, please add:</p> <p>Objective 1-1.3 - Watersheds are in, or are making significant progress toward, properly functioning physical condition, including their upland, riparian-wetland, and aquatic components; soil and plant conditions support infiltration, soil moisture storage, and the release of water that are in balance with climate and landform and maintain or improve water quality, water quantity, and timing and duration of flow.</p> <p>Objective 1-1.4 - Ecological processes, including the hydrologic cycle, nutrient cycle, and energy flow, are maintained, or there is significant progress toward their attainment, in order to support healthy biotic populations and communities.</p> <p>Objective 1-1.5 - Water quality complies with State water quality standards.</p> <p>Objective 1-1.6 - Habitats are, or are making significant progress toward being, restored or maintained for State and Federal threatened and endangered species, candidate or proposed threatened and endangered species, and other special status species recognized by the relevant State and Federal agencies.</p>
Kim Delfino and Jeff Aardahl on the behalf of Defenders of Wildlife, NRDC, California Council of Land Trusts, California	41	IV	1-3.1 1-3.2	4			Objectives: Please define the term "identified core habitat areas." I'm concerned that the term "identified" may preclude conservation of core habitats for various species and communities that simply haven't been identified thus far in the planning process.

Audubon, and Friends of the Desert Mountains						
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	42	IV	B.2	4-6		Woodland Community: Please include Microphyll Woodlands associated with washes in the eastern Mojave, Colorado and Sonoran Deserts within the DRECP Planning Area.
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	43	IV	B.2	7		Grassland/other Herbaceous Community-Objective 2-4.2: Please evaluate this objective because it appears to contradict the goals to promote native species in natural communities. Is the objective "Protect areas of non-native grassland community types" Correct?
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	44	IV	B.3	11		Desert Bighorn: All habitats occupied by Desert Bighorn, including Peninsular Bighorn, should be strictly avoided. There should be no provision simply allowing for minimizing or avoiding occupied habitat to the "extent feasible and practicable." (Objective 3-10.1.1) Desert Bighorn: All modeled suitable habitat and intermountain habitat movement linkages should be strictly avoided. There should be no provision that allows for avoiding such areas to the extent "feasible and practicable." (Objective 3-10.1.2)
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	45	IV	B.3	13		Mohave Ground Squirrel: Avoiding "core areas" identified by Leitner in 2008, and other documented occupation areas "to the extent feasible and practicable" is insufficient. All of these areas should be strictly avoided. The Mohave Ground Squirrel occurs in relatively high density over a broad region extending from Superior Valley, Coolgardie Mesa, and Kramer Junction north to Pilot Knob, Blackwater Well, Cuddeback Dry Lake and westward to the Indian Wells Valley and Rose Valley. Habitat modeling for this species is underway by the USGS. Pending completion of the habitat model, the DRECP should adopt the BLM's Wildlife Habitat Management Area as a conservation zone for this species.
Kim Delfino and Jeff Aardahl on the behalf of Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audubon, and Friends of	46	IV	B.3	14-15		Desert Cymopterus: Documented populations and suitable habitat should be strictly avoided, without consideration whether or not such avoidance is "feasible and practicable.")

the Desert Mountains							
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	47	IV	B.3	16-17			Barstow Woolly Sunflower: Same comment as above.
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	48	IV	B.3	17-18			Mojave Monkeyflower: Same comment as above.
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	49	IV	C	19			Conservation measures should include only actions aimed at avoiding impact, protecting habitat and conserving species and their ecosystems. Monitoring and reporting should not be considered as conservation, but rather management activities to judge effectiveness of conservation actions.
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	50	IV	C	20			Conservation measures should not include 1) Pre-activity surveys and monitoring during construction and maintenance activities, 2) Translocation of species from construction sites, 3) Species monitoring and research. Item 1 appears to be an impact mitigation activity, and 2 a measure to minimize take to incidental levels. Current studies and research continue to demonstrate that translocation, at least for the Desert Tortoise, is an experimental procedure with high levels of mortality to the species.

Commenting on: (Clean version, track changes version) \_\_May 4, 2011 Draft Chapter IV