Public Review Draft
Recommendations of DRECP
Independent Science Advisors

September 10, 2010

I appreciate the opportunity to provide comments on the Public Review Draft which contains the detailed recommendations of the Independent Science Advisors to the Desert Renewable Energy Conservation Plan (DRECP).

In general, this detailed set of recommendations is excellent and I would strongly urge that they be followed during development of the DRECP.

Before making specific comments, I would like to point out a major difficulty in developing any conservation plan covering this enormous desert region, a difficulty that I do not see being discussed in this Draft. Especially in the western Mojave Desert, there are very important and extensive military reservations. Although much of this Department of Defense land has been carefully managed to protect biological resources, the overriding defense mission makes it impossible to guarantee that conservation will always take priority. The geographic placement of these military installations makes it very difficult to imagine an effective conservation plan that works around and excludes these areas. This fundamental issue should be clearly identified and accounted for in any conservation planning effort. Right now, it appears that everyone is pretending that there is no issue here.

Here are a few specific comments on

p. 3 Data and Analytic Tools

I agree that the lack of an adequate land-cover or vegetation base map is a key limitation to conservation planning and would encourage quick action to remedy this situation. However, I would also recommend that any mapping developed to fill this information gap be carefully checked on the ground to be sure that it reflects reality. I have had the unfortunate experience of trying to use existing map products and discovering that they were wildly inaccurate.

p. 5 Siting and Mitigation Recommendations

The proposal that renewable energy projects be sited on previously disturbed land is probably the single most important recommendation in this document. While even disturbed lands can have some value to biological diversity (e.g., raptor foraging on agricultural lands), the overall conservation balance favors directing development to these areas. This is particularly true of solar projects because of the enormous contiguous land requirements. I believe that there is sufficient acreage of disturbed land available to allow California to reach its renewable energy goals. There are clearly problems with this approach, including the cost of such (mostly private) lands and the excessive

subdivision of ownership in some areas. However, siting renewable energy projects on lands with important biological resources can result in very high costs for the mitigation of impacts.

p. 9 Geographic Extent of Plan Area, Fig. 1

It is not clear why the Plan Area was drawn so as to exclude a large area in southwestern Inyo County that includes the Coso and Argus ranges. This area supports desert flora and fauna, including Joshua tree woodlands and important populations of the state-listed Mohave ground squirrel. This area should be included if the goal is to develop an effective conservation plan.

p. 62 Identify Areas Important to Conservation, and Areas *Not* Important to Conservation

I strongly concur with the recommendation that DRECP planning identify, field check, and map desert areas where ground disturbance has occurred. These are the obvious areas where renewable energy development should be directed.

p. 72 Linear Infrastructure

Location of new linear infrastructure along existing rights-of-way is in general a good idea. However, there is a tendency to locate renewable energy projects along such corridors as well, primarily because it is advantageous to have existing transmission available. This can result in broad bands of industrial development marching across the desert. The resulting linear barriers may well seriously fragment wildlife habitat and it is questionable whether we know enough to provide usable crossings. The "bundling" of linear infrastructure with accompanying energy development may be appropriate in areas of low conservation value, but very damaging in important wildlife corridors.

p. 73 Solar Projects

It is not clear that we know enough to construct effective wildlife crossing features to mitigate the fragmentation impacts.

Again, I would like to state that this document provides an impressive and comprehensive array of recommendations to guide the development of the DRECP. Providing the funding to implement these recommendations will be crucial to the success of DRECP.

Sincerely,

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