Center for Biological Diversity's Comments on the
DRECP Preliminary Conservation Strategy Report

Commenter (Your Name)	Comment #	Comment Location: Chapter	Section #	Page #	Paragraph	Paragraph (from top)	Reviewer Comment (e.g., organization, content, grammatical comments)
CBD	1	2		2-2	Table 2.1-1 DRECP Preliminary Conservation Strategy Map Description of Map Categories		Table 2.1-1 (and FIGURE 2-1 DRECP Preliminary Conservation Strategy Map) refer to areas as "low biological value" when in fact these areas appear to include two types of lands: 1) areas where there is little/no data on the biological resources (at pg. 2-2) - likely private lands that have not had bio surveys done on them or results of surveys not available and 2) areas that have been type-converted to other uses and may indeed have low biological values. Parsing out these 2 very different types of area would be useful. If they continue to be lumped together, then the name should reflect low/unknown biological value.
CBD	2	2		2-7	Table 2.1-2 Biological Elements and Data Layers Used to Depict Moderate to High Biological Value Areas for the Preliminary Conservation		

					Strategy Map		
CBD	3	2		2-9	IBID		Flat-tailed horned lizard. While the data layer for the FTHL management areas is included, the management strategy failed to provide any connectivity between management areas, despite FTHL occurring in habitat between some of the management areas. The DRECP needs to correct the oversight of this basic population biology tenet by feasibly connecting these management areas together.
CBD	4				Figure 2-2d Mohave Ground Squirrel Range		How was the Mohave Ground Squirrel Conservation and Recovery Area determined? It does not reflect the historic range (Leitner 2009) of MGS and therefore eliminates recovery in the south and east part of the range, where habitat still remains.
CBD	5	2		2-19	RESAs/Figure 2-1		Owens Valley RESA covers the entire Owens Lake Important Bird Area and includes portions of four Wilderness Study Areas, the Olancha Greasewood UPA, the Olancha Dunes, habitat for Le Conte's thrasher, designated Coso Wilderness, and MGS conservation area. It also includes the Owens River – a major recovering riparian area. While some of the area may be appropriate for industrial renewable energy development, these important biological resources should acknowledged and avoided. The USGS desert tortoise habitat model also identifies some suitable habitat within this RESA. In light of climate change it is likely that this area may become more suitable habitat for tortoise in the future.
CBD	6	2		2-19	RESAs/Figure 2-1		The large West Mojave RESA includes numerous rare species occurrences and includes portions of MGS conservation area (in several locations); western Antelope Valley, Koehn Lake and Mojave River Important Bird Areas; Middle Knob, Horse Canyon, Jawbone-Butterbredt, Mojave monkeyflower, Juniper Flats, Bendire's thrasher, carbonate endemics and Soggy Dry Lake creosote rings ACECs; desert tortoise ACEC/DWMA; desert tortoise, Parish's daisy and southwestern willow flycatcher critical

							habitats; numerous Los Angeles County SEAs; Red Rock Canyon State park; salt and brackish water marsh vegetation UPA and Johnson Valley/Lucerne Valley creosote bush clones UPA; designated Bighorn Mountain Wilderness, three different Management Areas identified in the 1980 Desert Plan, the Desert Tortoise Natural Area. It cuts across an important wildlife linkage (SCW 2005) between the San Bernardino Mountains and the Granite Mountains. The USGS desert tortoise habitat model also identifies suitable habitat within this RESA. As mentioned above, these currently recognized important biological areas within the RESA should be conserved as part of the DRECP.
CBD	7	2		2-19	RESAs/Figure 2-1		Barstow RESA also contain numerous currently recognized important biological areas: desert tortoise DWMA/ACEC; Pisgah ACEC; desert tortoise critical habitat; Mohave ground squirrel conservation area, Mojave saltbush assemblage UPA; Harper Lake and Camp Cady Important Bird Areas, one Management Area and one Special Area as identified in the 1980 Desert Plan; Mojave fringe-toed lizard Conservation Area; and lands put into public lands conservation through the Catellus deal. The Mojave River also goes through a significant portion of this RESA
CBD	8	2		2-19	RESAs/Figure 2-1		East Riverside RESA's currently recognized important biological areas include: desert tortoise DWMA/ACEC; desert tortoise critical habitat; Bighorn and multi-species WHMAs as identified in NECO; endemic insect hotspots; Palen Dry Lake, Chuckwalla Valley Dune thicket, Mule Mountain and the Desert Lily Preserve ACECs; and miles of microphyll woodlands.
CBD	9	2		2-19	RESAs/Figure 2-1		The Imperial RESA's currently recognized important biological areas include: Peninsular bighorn sheep, Pierson's milkvetch and desert pupfish critical habitat; Coyote Mountain, Yuha Basin, Lake Cahuilla, East Mesa, Dos Palmas, San Sebastian Marsh/San Felipe Creek ACECs; Yuha Basin and East Mesa flat-tailed horned lizard management areas; Imperial Valley and Algodones Dunes Important Bird Areas; Algodones Dunes psammophytic vegetation and

							mesquite thickets UPAs and the Salton Sea Recreation Area.
CBD	10	2		2-25	Table 2.2-1 Working Examples of Landscape-Level Biological Goals and Objectives	Objective LAND1.1	This objective suggests that the "legally and legislatively protected areas" are the existing core areas and linkages, when in fact they are existing conservation investments but may not be cores or linkages for covered species at the landscape level. Existing identified areas for species conservation, including DWMAs, ACECs, WHMAs, Management Areas, and critical habitat have been identified as critical area or cores for species conservation and would logically be the basis for a landscape level reserve design assembly.
CBD	11	2		2-25	Table 2.2-1 Working Examples of Landscape-Level Biological Goals and Objectives	Objective LAND1.1	Footnote on the definition of conserve: Please clarify "the contribution of additional legal protections to publicly owned land".
CBD	12	2		2-25	Table 2.2-1 Working Examples of Landscape-Level Biological Goals and Objectives	Objective LAND1.3:	The way the language reads in this section suggests that "unique landscape features, important landforms, and rare or unique vegetation types identified within the reserve design" need to be protected with reserve. Does this mean that development or other harmful activities will occur within "reserves"?
CBD	13	2		2-28	Table 2.2-2 Selected Habitat Functions of		The title and header of this table incorrectly refers to the land cover type as Natural Community.

					DRECP Natural Communities that Support Primary Habitat1 for the Working Example Wildlife and Plant Species2		
CBD	14	2		2-28	Table 2.2-2 Selected Habitat Functions of DRECP Natural Communities that Support Primary Habitat1 for the Working Example Wildlife and Plant Species2		Related to the above comment, without a clearer description of the actual vegetation type, the table is misleading. For example, in the land cover type of Desert Scrub and Chaparral is purported to meet "all life history requirements" for desert tortoise, when in fact desert tortoise are not found in chaparral. Setting conservation goals for chaparral which could subsequently be included as a benefit desert tortoise conservation in the plan, would be of little benefit to desert tortoise conservation on the ground.
CBD	15	2		2-28	Table 2.2-2 Selected Habitat Functions of DRECP Natural Communities		The table also simplifies the actual life history of some of the species. For example, the willow flycatcher is identified as having "all life history requirements" met in the "riparian" land cover. While the flycatcher does require riparian habitat for reproduction, it is migratory and relies on migratory pathways to get to its reproductive habitat. Potential impacts from collision with wind turbines could preclude them from even getting to their breeding habitat, so protection of their breeding habitat does not assure

					that Support Primary Habitat1 for the Working Example Wildlife and Plant Species2		persistence of the species. In other words, not all of its life history requirements are actually met in the riparian land cover areas. In fact, this table could be misconstrued so easily, it should be substantially reworked or deleted.
CBD	16	2		2-30 &31	Table 2.2-3 Summary of Conservation Targets for Natural Communities and Vegetation Types		Please clarify which the vegetation system is being used to identify these land cover and vegetation types
CBD	17	2		2-31	Table 2.2-4 Working Examples of Natural Community-Level Biological Goals and Objectives	Objective 1.1	In Objective 1.1 for all of the Land cover types, it states that __acres of the land cover will be conserved. Clarification needs to be made about how that conservation will occur over and above the existing conservation. For example – dunes - there are dune systems within the DRECP boundaries that are conserved already including dunes in the Mojave National Preserve. These dunes should not be included in the conservation goal as part of any "amount of land conserved will be scaled in proportion to impacts" (pg. 2-25). Currently conserved land cover types can not be used to as mitigation for development.
CBD	18	2		2-31	Table 2.2-4 Working Examples of Natural Community-		The broad sweep of the land cover categories also misrepresent the benefits to covered species. For example, riparian and woodlands are represented to benefit bighorn sheep (pg. 2-32 and 2-34 respectively). Indeed bighorn do need access to water but also avoid dense riparian areas because of predation threats. They rely more on access to open landscape water – tinajas, seeps, springs with out a lot

					Level Biological Goals and Objectives		of arboreal cover. Desert bighorn do not use woodland land cover. A much more refined vegetation type is needed in order to accurately assign conservation value to each covered species. Another example is carbonate plants: pg 2-33 suggests that conserving scrub and chaparral community will benefit the carbonate endemics…but their habitat is a miniscule subset of scrub community and it does not occur in chaparral. Their habitat is dependent upon quite specific carbonate soils on the north slope of the San Bernardino Mountains. The text suggests that they are widespread and conservation benefits will be gained by protecting desert scrubs, which is clearly inaccurate.
CBD	19	2		2-36	Table 2.2-5 Working Examples of Species-Level Biological Goals and Objectives	BAEA1.1 Geographic Area Examples	As an example, any species with specific water requirements, including bald eagles, aquatic species etc. should have requirements to maintain water features, whether that be water rights, prevention of upstream diversions, drawdown from groundwater pumping, etc. With global climate change occurring, securing of these important water resources for a variety of species is imperative.
CBD	20	2		2-36	Table 2.2-5 Working Examples of Species-Level Biological Goals and Objectives	Barefoot Banded Gecko	The document falsely states that "the species inhabits extremely rugged and formidable terrain suitable habitat is generally not subject to widespread development and loss". In fact, a large-scale renewable energy development is threatening its habitat now. This threat should also be included in the threats section.
CBD	21	2		2-37	Table 2.2-5 Working Examples of	Barstow Woolly Sunflower	Barstow woolly sunflower was found at the DTNA this last spring, representing a significant range extension to the northwest. Please define "unprotected population".

					Species-Level Biological Goals and Objectives		Please clarify if existing BLM conservation areas are considered conserved.
CBD	22	2		2-38	Examples of Bighorn Objectives		The Center needs to see much more specific objectives for species conservation. Using the example of desert bighorn, the PCS should incorporate very specific objectives that will actually be actionable on the ground for enhancement of bighorn habitat. For example (but not limited to): 1)enhancing connectivity by making current barriers passable, 2) elimination of domestic stock grazing which competes with or introduces potential disease into the desert bighorn range, 3) enhancement of desert water sites used by bighorn, and 4) prevention of further fragmentation and connectivity obstruction in the future.
CBD	23	2		2-39	Carbonate Plants		The PCS needs to clarify how the DRECP will incorporate the Carbonate Habitat Management Strategy (CHMS), which was developed over a number of years with private industry, numerous federal and state agencies, and conservation organizations with substantial effort and ultimately adopted by WEMO. It currently appears that conservation areas identified in the CHMS will now be developed under the PCS. This is unacceptable.
CBD	24	2		2-40	Desert Tortoise	Objective DETO1.1	Like many of the objectives, the language under this objective fails to identify what the conservation actually is, and instead refers the reader to a series of other goals and objectives that need to be looked up to actually see if they are relevant. This is obfuscating and frankly frustrating. As presented, true desert grasslands and chaparral are not prime habitat for desert tortoise so may have little benefit for conservation for this declining species. This approach could disincentivize conservation of the most important habitat for desert tortoise, through meeting goals for conservation of land cover that actually is not key habitat for desert tortoise. The PCS must put in place much more accurate species-specific habitat needs.
CBD	25	2		2-40	FTHL		As with the desert tortoise comment above, the PCS must put in

						Objective FTHL1.1:	place much more accurate species-specific habitat needs, because the land cover included here are not reflective of FTHL habitat. In addition, the PCS needs to clarify how it will incorporate the FTHL Management Strategy and how it will augment it to provide additional conservation benefits. Connectivity between the currently designate management units would be appropriate along with increasing the areas of the management units and the conservation management within them.
CBD	26	2		2-41	LMMV	Objective LMMV1.1	This objective makes little sense. The existing LMMV conservation area and current management is supposed to protect the species already, according to the resource agencies. Objectives should augment the conservation areas to include all known occurrences. Numerous other additional actions should be taken to keep this rare and declining plant species from going extinct. Those actions should be clearly laid out as part of the conservation strategy.
CBD	27	2		2-43	MOMF	Objective MOMF1.1:	The strategy (or actually lack of it) should be significantly rethought. While Mimulus mohavensis has some specific soil affiliations, it also is an annual plant species that moves around in its habitat. Simply protecting X number of populations as proposed, will not ensure species conservation over the long-term. Habitat must be preserved that will enable the species to move around on the landscape and allow for the "boom" periods to occur where the seedbank is replenished to that during the "bust" periods the species can survive them. "Conservation" areas previously identified for this species have ended up without the species present in them anymore. The DRECP must ensure that the conservation strategy is robust to ensure that this species is actually conserved.
CBD	28	3		3-2	Dune Systems & Sand Resources		We are glad to hear that more research is occurring for this important habitat type. The PCS falls well short of including existing literature on the known sand transport corridors in the Mojave. That said, the list of features (places) "which may be associated with dune and other sand resource formation, but active dune systems and other major sand accumulations were not discernible on the aerial

					imagery" appears to be "writing off" these areas that actually are sand sources for the identified dune areas in the PCS' previous paragraph. For example, the Salt Creek/Amargosa River is likely the sand source for the Dumont Dunes and the substantial stabilized sand flats east, north and south of the dunes. In addition no mention is made of the Mojave River, which is a significant sand source for several dune areas. The PCS also seems to "write-off" smaller dune areas, which we believe are essential "stepping stones" for specialized sand-specific species dispersal.
CBD	29	3			
CBD		3			We continue to support the ISA's recommendation of using statistical modeling as the highest priority, based on adequate data sets for species. We are disconcerted that the PCS has moved forward with expert-based modeling as the primary type of modeling, despite the ISA's recommendations.
	30		3-16	modeling	
CBD		3			As noted above, the modeling effort to date models existing conditions for the species. The PCS needs to include climate change modeling immediately in the modeling process because the DRECP is designing a reserve design for at least two decades into the future, when the environment will be continuing to respond to climate change.
	31		3-21	Model Review and Refinement	
CBD		3		Table 3.6-1 Conservation Status	
	32		3-24	Designation in the Plan Area	Table 3.6-1 fails to include critical habitat designation, which is an important recovery designation.
CBD		3			Table 3.6-2 is confusing, because it identifies agricultural areas and developed areas as "conserved". "Conserved" needs to be defined.
	33		3-27-31	Table 3.6-2 Gap Analysis of General Land Cover	While we agree that Type 1 & 2, as defined, at a minimum should already be conserved, in the on-the-ground reality, conservation is not always the case. If areas are truly "conserved", they should have

						conservation as the highest priority.
CBD	34	3	3-31-32	Table 3.6-3 Gap Analysis of Modeled Habitat		Because of the inadequacies of the data of the models (see below), we believe that the acreage figures presented are premature and suggest that this table be deleted.
CBD	35	3	3-33	Species Occurrences for Covered Species		The PCS states that "there is a disproportionately high level of protection for flat-tailed horned lizard, showing 71% of the known occurrences on protected lands". As identified above, "management areas" have been established for FTHL, however, these areas still allow for legal ORV activities and solar and transmission development is occurring in them. In addition illegal ORV activity continues to routinely degrade these management areas, so the on-the-ground reality is that only habitat within the Coachella Valley MSHCP is actually conserved – and that area is not apart of this plan.
CBD	36	3	3-11	Table 3.6-4 Gap Analysis of Species Occurrences	Plants	The BLM has spent years documenting occurrences of the both the Algodones Dunes sunflower and Pierson's milkvetch and have documented thousands more occurrences than are identified in this table. See http://www.blm.gov/ca/st/en/fo/elcentro/algdunesmonitorstudy.html
CBD	37	3	n/A			As per our comments on the DFCS that appear to not be addressed, we submit them again here: While we support maximizing the conservation area size, we note that existing conservation investments already occur within the boundary of the DRECP. The PCS still needs to clarify that these existing investments (i.e. National Park Service units, ACECs etc.), while apart of the conservation reserve system do not in and of themselves offset impacts of covered activities. Appropriate additional conservation in these areas may be apart of the conservation scenario, but additional acquisitions must be apart of the reserve assembly. Connectivity in light of climate change scenarios needs to be included.

In order to maintain linear features, such as streams, desert washes or desert riparian woodlands , the functioning of the watershed needs to be retained. Therefore, it is not appropriate to only protect these linear features, but to also include the hydrological functions of the upland areas.

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".

While we support the idea of providing physical distance between impacting uses and conservation areas, buffers are typically controversial and problematic for management. 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
CBD	38	5		5-1	Plan Structure		Please define what a " hybrid between the comprehensive NCCP/HCP and umbrella NCCP/HCP" is. In order to have a viable conservation plan that function to truly conserve the species it purports to conserve, the DRECP's goal must be a comprehensive plan. A public land only plan can not assure conservation for many of the proposed covered species.
CBD	39	6		6-1	6.1 Process for Soliciting Additional Expert Input		CBD supports independent scientific review of the DRECP. While this chapter 6 indicates that a "DRECP science review workshop in early 2012" will be convened, we think there is great value in reconvening the Independent Science Advisors and have a review process that follows a similar process that produced the ISA's Report. It will also provide feedback on how well the DRECP is following the ISA's expert recommendations.
CBD	40	App A-1		n/a			Additional biologically (and in some cases cultural) important areas have been identified in the BLM's 1980 Desert Plan for the CDCA, which have not been superseded by subsequent land use plan amendments. These areas should be included as metadata in this process. These areas include: Unusual Plant Assemblages (UPAs) Habitat Management Areas (HMAs) – many of which actually have existing management plans Special Areas (SAs) – also having existing management plans.
CBD	41	App A-2		n/a	Reserve Design Concepts and Tools		As mentioned above, the reserve design must incorporate climate change flexibility, over at least the life of the plan, but since the reserves are in perpetuity, into the conceivable future.
CBD	42	App B part 2		2	Golden Eagle		CBD's understanding is that BLM has an on-going inventory of raptor nests in the CDCA, which also presumably incorporates the eagle/raptor nest surveys that existing project applications and permitted projects have done in the recent few years. Due to nest

							fidelity, these data should be used in determining not only breeding sites , but territories for eagles and other raptors in the DRECP.
CBD	43	App B part 2		2	Golden Eagle		Additional information on how eagles utilize the landscape needs to be included in modeling for and assessment of impacts for this iconic species. For example, scientific literature on this subject is clear - the presence of humans detected by a raptor in its nesting or hunting habitat can be a significant habitat-altering disturbance even if the human is far from an active nest (Richardson & Miller 1997). Regardless of distance, a straight-line view of disturbance affects raptors, and an effective approach to mitigate impacts of disturbance for golden eagles involves calculation of viewsheds using a three-dimensional GIS tool and development of buffers based on the modeling (Camp et al. 1997; Richardson and Miller 1997). Golden eagles have also been documented to avoid industrialized areas that are developed in their territory (Walker et al. 2005).
CBD	44	App B part 2		3	Burrowing Owl		The PCS is not using the most recently available data on the status of burrowing owls. In 2009, Manning documented a substantial decline (27%) in the number of burrowing owl territories in the Imperial Valley. So the population in Imperial County is not stable. With the proposed reduction in agriculture in the Imperial Valley as part of the water transfer to San Diego County, additional declines in this species are anticipated. In addition, Wilkerson and Siegel (2011) found that a key area for burrowing owl in the western Mojave desert.
CBD	45	App B part 2		2-3	Swainson's hawk		The PCS indicates that the MNP is conserved, however, activities that are detrimental to many species (including Swainson's hawks) still occur within the MNP, including domestic stock grazing and hunting. The PCS gives an overview of the status within the state but fails to identify that the Swainson's hawks in the desert regions of California are the last remaining breeding pairs in southern California. Therefore in order to keep viable reproduction in southern

							California, great emphasis must be placed on conserving these particular Swainson's hawk populations.
CBD	46						We did not have a chance to review the remainder to the species information and look forward to doing that subsequently and in future iterations.
Commenting on: (Clean version, track changes version) _clean version							