

Sierra Club Comments on the Preliminary Conservation Strategy

In general, the “preliminary conservation strategy” is not yet a conservation strategy but an amalgam of various resources compiled to date, which is important but not yet sufficiently refined. There is a proposed list of covered species but no linked goals and objectives for each species proposed, for example. The following are recommendations on necessary elements for a conservation strategy that would constitute a more robust starting point. These comments are supplemental to our signing onto more detailed comments by Defenders of Wildlife which will be submitted separately.

First, there should be more transparency between the agencies and consultants and the stakeholder group as this plan is developed. The heart of the conservation plan, its building blocks, are the specific and measurable goals and objectives. Determining the goals and objectives should be the primary focus of the Stakeholders’ and the Covered Species Subcommittee’s deliberations around the Conservation Plan. The Stakeholder Committee should be an active participant in recommending, reviewing and advising on the goals and objectives. Further, the goals and objectives, both species-specific and broader ecosystem-level goals and objectives, as well as the list of covered species, should be peer reviewed by scientific experts including but not limited to the Scientific Advisory Committee.

The Conservation Plan should also be designed in a phased approach whereby conservation and development track one another, with care to ensure that in more or less equal measure as development increases, related conservation is assured. This “rough step” process is beneficial to all parties.

The best way to build the plan from the ground up is to divide the planning area into specific regions and utilize existing plans to identify recommended conservation actions and build upon them. Existing planning documents such as the Desert Tortoise Recovery Plan, West Mojave Plan and others provide a starting place for identifying conservation needs and opportunities for specific regions. Many other resources for identifying needed conservation actions in specific areas are available.

By focusing on regions, the species-level conservation goals and objectives can be quite specific and related to on-the-ground conditions. However, species-level goals and objectives are not sufficient alone and a robust plan will need to be built on a broader landscape evaluation to identify linkage corridors as well as larger scale responses to ecosystem-level conditions such as possible climate change impacts. These elements should also include measurable goals and objectives.

A reserve design should follow principles of conservation biology by identifying existing protected areas and building upon them. To ensure connectivity among reserves, the plan can build on previous designs including but not limited to the

California Essential Habitat Connectivity Project. While core protected areas are critical, they should also be surrounded by buffer zones designed by experts. Building the plan incrementally over time may allow for better data to be developed to inform where such buffers are needed.

Ample intact habitat for each of numerous keystone species is a fundamental element of reserve design and these species' permanent protection should be one of the central conservation goals of the plan along with protecting ecosystem processes, landscape level connectivity, planning for climate change and similar goals. In addition to core reserves and connectivity, proven mitigation actions should be chosen carefully based upon scientific evidence of their efficacy. A DRECP-funded review of the history and effectiveness of mitigation and conservation actions in the region would be helpful in sorting out what's worth investing in and what is not.

Actions such as restoration and transplantation are not and should not be regarded as full mitigation. Translocation of desert tortoise in particular has shown low to non-existent success in recent studies, with over 50% mortality within just a few years according to Dr. Kristen Berry's work. However, control of subsidized predators such as ravens has shown to be valuable and should be considered as part of mitigation bundles.

Although sub-regional planning can ensure that conservation is at a fine enough scale to capture important suites of species at the local level, a robust conservation plan must also be more than the sum of its parts. Only on a broader landscape scale can many species needs, as well as large-scale impacts such as climate change, be addressed. In this regard, the Conservation Plan needs to include a specific climate change element that reviews existing literature on potential impacts and addresses them in every part of the plan, solicits input from scientists studying impacts of climate change on the desert region, and incorporates new data and projections into an adaptive management framework. The overall plan's adaptive management component should require regular review of the plan, the goals and objectives, and its success or failure to date at least every five to seven years. As with the original plan, a Scientific Advisory Committee as well as a broad Stakeholder Committee should participate in the review. Without this, the plan could go seriously off-track and fail to preserve the desert ecosystem.

With regard to planning for renewable energy, we have noted above that the plan should be phased and conservation/mitigation should roughly keep pace with development. In addition, the most prudent path to take with the fewest costs to both the ecosystem and renewable energy developers is to permit development on areas with the lowest conservation values first. Thus, the most disturbed areas should be developed first and the most intact areas should never be developed. In addition to identifying areas with the lowest conservation values, the Conservation Plan should

recommend policy objectives to address policy barriers to developing lowest conservation value, high resource value locations.

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