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October 26, 2011

# **APPENDIX E**

## ***Stakeholder Comment Matrix***

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October 26, 2011

## APPENDIX E – Stakeholder Comment Matrix

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Stakeholder comments are being catalogued as they are received. This matrix records comments received to date on the Framework Conservation Strategy Report (FCSR) and these interim work products:

- Effects Analysis Memo;
- PCS Structure Memo;
- Species Modeling Memo;
- Subareas Memo; and
- Species Models.

These comments have been and will continue to be considered and incorporated in Desert Renewable Energy Conservation Plan (DRECP) work products as they are produced.

**Appendix E  
Stakeholder Comment Matrix**

<b>Framework Conservation Strategy Report Comment Matrix</b>				
<b>Comment Date</b>	<b>Commenter</b>	<b>Location/Chapter</b>	<b>Section, Subsection, Paragraph, Sentence</b>	<b>Comment or Issue</b>
				OVERALL: It is our opinion that the process of providing a draft of a document prepared by consultants for review and comment by stakeholders is not useful. From our review and from initial comments by Defenders of Wildlife, it is clear that the document is flawed in many ways, and it appears that it has not been given the serious consideration, review or input of the conservation planning, eco-assessment, or biological sections of the REAT agencies. It is clear also that it has not been reviewed by the ISA before release to the stakeholders. In our opinion, a more useful process would be that the final draft of an important document such as this one would be presented to stakeholders for review so that they could see that their "stake" is represented properly and completely, not to help write the document or peer review the conservation science and data. Many of our comments would have been caught by agency or science advisors and certainly would have been corrected or restated in a much more comprehensive and professional manner.
5/31/2011	Audubon, Garry George	Global	Global	
5/31/2011	Audubon, Garry George	I, Intro	I.A.3, page 3, paragraph 2	"Only solar thermal and solar photovoltaic (PV) projects within the DRECP boundary qualify for ARRA funding under SB 34 (CEC 2010)." This is unclear as SB34 does not provide ARRA funding.
5/31/2011	Audubon, Garry George	I, Intro	I.A.3, page 5, paragraph 2	"In addition to the recommendations from the ISA, additional advice from scientific experts will continue to be sought as needed at several points during the planning process". We suggest that this is one of those points, and should have been done prior to release of this draft.
5/31/2011	Audubon, Garry George	I, Intro	Section I.B, page 6, paragraph 5	"Identify and incorporate climate change adaptation research, management objectives, and/or policies into the final plan document." This has not been developed. Audubon provided samples of extensive climate change adaptation modeling science on species of birds in California, but this important science has not been mentioned, discussed, or included in the draft document. Climate change as an ecological process or as an impact on biological resources has not been fully discussed in the document. Even though it will be covered in the DEIR/DEIS it deserves more attention in this document in discussion of conservation reserves and conservation actions.
5/31/2011	Audubon, Garry George	I, Intro	Section I.C.4, page 10, paragraph 2	"In late 2010, the Covered Species Working Group developed a species "filtering" tool." The Covered Species committee commented on the tool. The tool was developed by U.S. Fish & Wildlife Service
5/31/2011	Audubon, Garry George	I, Intro	Section I.C.4, page 11, paragraph 8	"Wildlife species of special concern to CDFG (CDFG 2011b)." We recommend adding "USFW Service Birds of Conservation Concern"
5/31/2011	Audubon, Garry George	I, Intro	Section I.C.5, page 13, paragraph 9	"RPS biomass projects " This has been eliminated by the Covered Activities Committee
5/31/2011	Audubon, Garry George	II, Environmental Setting	Section II.A.1, page 2, paragraph 3	Should Planning Species be defined here? Should Conservation Action be defined here?
5/31/2011	Audubon, Garry George	II, Environmental Setting	Section II.B.4, page 24, paragraph 1, "Owens River and Owens Lake"	"In recent years, the Los Angeles Department of Water and Power (LADWP) has been applying water and maintaining large ponds on the Owens Lake playa for dust control purposes." We would recommend "Since 2000, the Los Angeles Department of Water and Power (LADWP)....."
5/31/2011	Audubon, Garry George	II, Environmental Setting	Section II-2, page 42, paragraph 4	We recommend inclusion of "Audubon California has identified 22 Important Bird Areas in the DRECP Boundary," with a footnote explaining the Important Bird Area program. <a href="http://web4.audubon.org/bird/iba/iba_intro.html">http://web4.audubon.org/bird/iba/iba_intro.html</a>
5/31/2011	Audubon, Garry George	II, Environmental Setting	Section II.C.4, page 71, paragraph 3	"Although fewer numbers of birds are likely to use these agricultural areas compared to the Imperial Valley (due to its proximity to the Salton Sea and substantially more agriculture)". Please cite your reference for the conclusion that proximity to the Salton Sea is a factor in numbers of birds in agricultural areas or delete
5/31/2011	Audubon, Garry George	II, Environmental Setting	Section II-2.C.5, page 74, paragraph 1	Please describe aerial habitat and migratory pathways for migratory movements of birds, bats and insects
5/31/2011	Audubon, Garry George	II, Environmental Setting	Section II-D.3.1, page 100, paragraph 1	"The DRECP conservation strategy is designed to complement and support the extensive network of public lands and managed conservation areas already in place in the Plan Area." We recommend the more inclusive "The DRECP conservation strategy is designed to complement and support the extensive network of conservation areas and actions on public and private lands in the Plan Area."
5/31/2011	Audubon, Garry George	III, Conservation Planning Process	Table III-17, page 18, paragraph 1	Please add Owens Lake Conservation Plan currently in preparation by LADWP, and any draft plan of Salton Sea, and Eagle Conservation Plan

DRAFT - October 26, 2011  
**Appendix E**  
**Stakeholder Comment Matrix**

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5/31/2011	Audubon, Garry George	III, Conservation Planning Process	Table III-9, page 22	Should Draft Eagle Conservation Plans be added? Should Avoidance should be one of the conservation actions of that? Are there other Conservation Plans with conservation actions that are not just landscape level but are conservation plans with conservation actions for conservation areas that should be included in the matrix on Covered Species?
5/31/2011	Audubon, Garry George	IV, Conservation Strategy	Section IV, page 3, paragraph 2	"Objective 1-1.2. Apply avoidance and minimization measures to the design and siting of renewable energy projects to avoid or minimize impacts to the most sensitive natural communities and species habitats." Does habitat include wildlife corridors and migratory pathways on the landscape and aerial levels?
5/31/2011	Audubon, Garry George	V, Interim Description of Covered Activities	General	Gen-tie construction and operation is not considered fully in the transmission section, although it is in the covered activities. Should operation of wind turbines should be considered as a Covered Activity as well as construction and maintenance?
5/31/2011	Audubon, Garry George	App A	A3.4, page 96, BUOW	In California, the CDFG is preparing a conservation strategy for burrowing owls (Burkett and Johnson 2007) Can you get and provide this document to include in this document? Conservation recommendations will inform the DRECP.
5/31/2011	Audubon, Garry George	App A	A3.4, page 98, BUOW	"Though populations remain stable in areas such as the Imperial Valley and throughout the western Mojave Desert." This is outdated. Please update with latest statistics on BUOW in Imperial Valley which show declines.
5/31/2011	Audubon, Garry George	App A	A3.6, paragraph 6	"Though there are only two nesting occurrences on record for this species within the Plan Area in the California Natural Diversity Database....." BLM, USFW Service, County DEIRs, utilities, wind project applications have better and more up to date data on GOEA nesting in the Plan area and on species distribution. DFG CNDD is the weakest source. Since this is a REAT effort, this baseline could be compiled with cooperation, and this aerial habitat (GOEA nesting sites and surrounding flight areas) is a good example of why landscape level conservation alone will not be adequate for a conservation plan that includes renewable energy such as wind energy that directly and indirectly impacts aerial habitat. Dave Bittner can give nests in San Diego County. Tule Wind project in Easter SD County in DRECP boundary reported Eagle nests. Distribution map is inadequate and should be removed until updated. p. 107 - Within Plan Area: Apparently stable (Remsen 1978)  USFW March 2010 Protocol has citations for decline of Eagle in western U.S., and Remsen 1978 is a very long time ago. This should be updated or status should be "unknown". Has USFW Service reviewed this document? p.108 "There are no conservation actions in the Plan Area directed specifically at the golden eagle." Eagle Conservation Plan is directed at Bald and Golden Eagle
5/31/2011	Audubon, Garry George	App A	A3.11, paragraph 2	Collisions with wind turbines during migration may be a threat as willow flycatchers have been recorded in migration on at least one wind project site (NextTera North Sky River Project, 2011, Kern County, DEIR) although not identified to subspecies.
5/31/2011	Audubon, Garry George	App A	A3.11, paragraph 5	"Protection and management of the Kern River Preserve, California" should read "Protection and management of the Audubon Kern River Preserve, California" – this section could be reviewed by Dr. Barbara Kus of USGS.
5/31/2011	Audubon, Garry George	App A	A4.1	Consider consulting Audubon Christmas Bird Counts and eBird. Limiting data to that published by a government agency is unduly restrictive.

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5/31/2011	CalWEA, Nancy Rader	V	Sections A and B	<p>Chapter V (sections A and B) describes the principles that will guide "the quantification of impacts associated with Covered Activities that are proposed for take authorization under the DRECP." The chapter states that it "is assumed that the primary means of defining impacts is calculation of an <u>area of ground disturbance</u>" (emphasis added) and notes that the unique impacts of some technologies may require consideration of "other other assessment parameters and set maximums for these parameters" which, in the case of wind energy "could be established based on what correlates best with impacts to avian and bat Covered Species." The chapter also includes an initial "rough estimate" for acreage scenarios that could potentially meet anticipated future targets for renewable energy production that range from 100,000 to 500,000 acres of ground disturbance. This estimate compares to a range that was subsequently released by the California Energy Commission (CEC) ranging from 571,676 acres to 1.17 million acres.</p> <p>1 "Acreage Needed in 2050 for Renewable Generation to Meet California's GHG Emission Reduction Goals," California Energy Commission, May 9, 2011.</p>
5/31/2011	CalWEA, Nancy Rader	V	Sections A and B	<p>While the Draft Conservation Strategy does not document the methodology that produced its estimated acreage range, the spreadsheet that accompanied the CEC document employs a figure for "needed acreage" for wind energy projects of 0.025 MW/acre (40 acres per MW). This figure corresponds accurately to the area that typically must be leased in order to reserve and protect the surrounding wind resource that supplies the project's wind turbines. It does <u>not</u> represent ground disturbance area – i.e., all Covered Activities such as roads, turbine pads, maintenance and storage facilities, and substations – which is typically just 2%-5% of the lease area. 2</p> <p>2 See, e.g., <i>20% Wind by 2030: Increasing Wind Energy's Contribution to U.S. Electric Supply</i>, U.S. DOE (May 2008) at p. 110 (available at <a href="http://www.20percentwind.org/20percent_wind_energy_report_05-11-08_wk.pdf">http://www.20percentwind.org/20percent_wind_energy_report_05-11-08_wk.pdf</a>).</p>
5/31/2011	CalWEA, Nancy Rader	General	General	<p>CalWEA does not object to the use of the 0.025 MW/acre metric for purposes of anticipating and planning for the area needed for wind projects (discussion at the May DRECP Stakeholders Committee meeting indicated such a purpose for the total acreage figures). DRECP documents that employ this metric should, however, clearly state that this metric does not represent disturbance area. For impact metrics, wind energy's impacts should be based on some combination of actual disturbance area and, as indicated in the Draft Conservation Strategy, a metric that captures bird and bat impacts.</p>
5/31/2011	CalWEA, Nancy Rader	General	General	<p>CalWEA has one related comment, anticipating future iterations of the Draft Conservation Strategy that incorporate technology-specific acreage estimates, such as those released by the CEC. CalWEA is less concerned about the total estimate of the amount of renewable energy that may be required in the 2050 timeframe (assuming a reasonable upper-bound case is included), and more concerned about technology-specific estimates that could translate into technology-specific caps. As no one can forecast technology advancements within such a long time frame, as well as related capabilities (such as the ability to integrate intermittent resources into the grid), it will be essential that the DRECP plan for the total amount of forecast energy, including a variety of possible technology mixes within that total.</p>

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5/31/2011	CalWEA, Nancy Rader	IV	IV.B.3	<p>Chapter IV of the Draft Conservation Strategy (specifically, IV.B.3 Species-Level Goals and Objectives) states the objective for several species that renewable energy facilities should be sited outside of areas known to be occupied by those species. (The noted species are the desert bighorn sheep, Mohave ground squirrel, desert cymopterus, Barstow woolly sunflower, and the Mohave monkeyflower.)</p> <p>As CalWEA has previously noted in comments submitted to the Covered Species Working Group in relation to the Reserve Design and Assembly Principles, the document should reference the fact that wind energy projects are potentially compatible in some reserve, corridor and buffer areas, and could support CONTINUED BELOW...</p>
5/31/2011	CalWEA, Nancy Rader	IV	IV.B.3	<p>CONTINUED FROM ABOVE... biological resources and wildlife movement in those areas, presuming careful siting, mitigation and monitoring. This ability is due to wind energy's small ground-disturbance footprint and the ability to carefully micro-site turbines. Therefore, total avoidance of areas occupied by these and other species should not be an across-the-board recommendation for wind projects. In fact, "co-location" of wind energy projects and sensitive species could facilitate the ability to identify and secure large, contiguous reserve areas while simultaneously preserving high quality wind resource areas for development.</p>
5/31/2011	CalWEA, Nancy Rader	V	V.C.3	<p>Section V. C.3 on wind projects states, "To provide a dependable resource, wind energy systems may be coupled with energy storage or with other power generation sources." This sentence is followed by this note:                      &lt;&lt;Energy storage requires discussion among the REAT, the DRECP Stakeholder Committee, and DRECP working groups, on the extent to which storage technology and options should be outlined.&gt;&gt; CONTINUED BELOW...</p>
5/31/2011	CalWEA, Nancy Rader	V	V.C.3	<p>While the DRECP might want to provide for the possibility of on-site storage or other "back-up" facilities (which would probably be similar to an ancillary building, e.g., one that houses a battery bank), CalWEA's understanding is that storage and other on-site "back-up" facilities -- to the extent that they are needed to integrate renewables into the grid (and initial studies are showing they will not be for the 33% RPS) we not -- do not need not be coupled on-site with a specific power plant. As part of an integrated utility grid, it would be grossly inefficient to require each individual wind (or solar) project "dependable". The grid as a whole needs to be dependable, not each power plant. From both system efficiency and transmission utilization standpoints, installing storage systems very close to load centers will be optimal. CONTINUED BELOW...</p>
5/31/2011	CalWEA, Nancy Rader	V	V.C.3	<p>CONTINUED FROM ABOVE...When numerous wind and solar plants are spread across wide geographies and have widely diverse and complementary generation output, their overall output is much smoother and more "dependable" than any single plant. Storage, if needed, should be applied to make overall system operations dependable under the combined circumstances; further, storage per se may not be needed -- the need for system flexibility and capacity may well be served more cheaply via additional gas units and/or demand response programs (beyond what is needed for meeting the system's planning reserve margins). Whichever means of providing the needed "dependability," the total need will be significantly smaller than what would be required to make wind/solar plants individually "dependable." CONTINUED BELOW...</p>

DRAFT - October 26, 2011  
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5/31/2011	CalWEA, Nancy Rader	V	V.C.3	CONTINUED FROM ABOVE...Therefore, although the sentence in the draft says "To provide a dependable resource, wind energy systems may be coupled with energy storage or with other power generation sources", it leaves the impression that wind energy systems need or should be coupled with such systems, which is not the case. Therefore, we need not focus much of the DRECP's attention on desert siting of storage (or non-renewable power generation sources) in conjunction with wind (or non-thermal solar) projects (storage systems may be inherently more efficient in conjunction with solar-thermal projects).
5/31/2011	CalWEA, Nancy Rader	V	V.C.3	Finally, the "dependability" statement is made only in reference to wind energy even though, to the extent that the notion is accurate, it applies equally to other intermittent renewable resources.
5/31/2011	CalWEA, Nancy Rader	V	V.C. Table V-1	In the Covered Activities Working Group process, CalWEA provided edits to the Covered Activities chart that are either not reflected or not accurately reflected in Table V-1. (See 12/20/10 email from Nancy Rader to Covered Activities Working Group.) The file containing our proposed edits is attached. It appears that the mis-incorporation of our comments was inadvertent; we would like to discuss any discrepancy that represents a disagreement.
5/31/2011	CBD, Ilene Anderson	I, Intro	Section I.A.1, page 4	Need to include AB2, signed into law in April 2011
5/31/2011	CBD, Ilene Anderson	I, Intro	Section I.B, page 1-5, 3rd bullet	The Center does not agree that the program goals should build on the RETI CREZ, because the CREZ were based on existing applications, many of which are in inappropriate areas of critical biological importance. Delete this goal.
5/31/2011	CBD, Ilene Anderson	I, Intro	Section I.B, page 6	This section that describes needs to also include a place holder for the western end of the Antelope Valley
5/31/2011	CBD, Ilene Anderson	I-4	General	In each chapter that mentions communities, it starts off with forests, then woodlands and riparian. This seems awkward considering that most these communities are barely represented. Descriptions should be addressed from the most common and go to the least common.
5/31/2011	CBD, Ilene Anderson	I, Intro	Section I.C.4, page 10, paragraph 1	The REAT actually developed the species "filter" and the covered species just suggested improvements.
5/31/2011	CBD, Ilene Anderson	I, Intro	Section I.C.4, page 1-11, 6th bullet	Clarify that State Fully Protected species are not covered species for state take permits
5/31/2011	CBD, Ilene Anderson	I, Intro	Section I.C.5, page 13, paragraph 2, 5th bullet	Covered activities working group recommended that biomass be removed as a covered activity.
5/31/2011	CBD, Ilene Anderson	I, Intro	Section I.D.2.3, page 17	Need to include the section on fur-bearing mammals (California Code of Regulations, Title 14, section 460 for desert kit fox and badgers in particular.
5/31/2011	CBD, Ilene Anderson	I, Intro	Section I.D.3.4, page 19	WECO should be included.
5/31/2011	CBD, Ilene Anderson	2, Environmental Setting	Map on p 27	Unclear the map. What do the priorities represent? What were the criteria? How does that relate to the DRECP?
5/31/2011	CBD, Ilene Anderson	2, Environmental Setting	page 31, 47-56, land cover maps	As we've discussed in the mapping group, these maps misrepresent what they are purported to represent, namely vegetation communities. As discussed also in the group, they are to be replaced by actual maps of plant communities. As the ISA indicated a vegetation map is required, and in its absence strategies for "no regrets" should be the focus. The Draft Framework Conservation Strategy needs to address a "no regrets" strategy now so that it can be the basis for identifying areas that will not be included in the conservation scenario, which can be easily folded into the subsequent conservation scenario once the vegetation mapping has occurred. The "land cover map" is now apparently creeping into that role of vegetation map inappropriately. These maps should not be used as the basis for any decision-making, but as placeholders only
5/31/2011	CBD, Ilene Anderson	2, Environmental Setting	Table II-3	Similar comment as above - the "communities" and the acreages assigned to them misrepresent on-the-ground reality. The table should be used as a placeholder
5/31/2011	CBD, Ilene Anderson	2, Environmental Setting	General	Descriptions of the "communities" and the flora/fauna within them will also need to be redone once the more accurate mapping is completed.
5/31/2011	CBD, Ilene Anderson	2, Environmental Setting	page 76	The linkage information should also include the linkage work done by SCWildlands between Joshua Tree NP & MCAGCC <a href="http://www.scwildlands.org/reports/JT_TP_Connection.pdf">http://www.scwildlands.org/reports/JT_TP_Connection.pdf</a> as well as the recognition that the linkages will be further refined once the SCWildlands finishes their desert wide analysis (again another placeholder).
5/31/2011	CBD, Ilene Anderson	2, Environmental Setting	page 107, Type 2 lands	Type 2 lands should also include designated Wildlife Habitat Management Areas (WHMAs) by BLM, BLM designated Unusual Plant Assemblages (UPAs), BLM designated MUC Class "L", other conservation areas designated to preserve specific wildlife species and ecosystem processes, including the Mojave Ground Squirrel Conservation Area.
5/31/2011	CBD, Ilene Anderson	3, Conservation Planning Process	Section III.A	The term conservation area needs to be much more robustly defined. Presumably it includes areas established for conservation of species, ecological processes etc. It should include Unusual Plant Assemblages, critical habitat, and other previously identified unique biological (and cultural) features. The definition of a conservation area is key and needs to be clarified. The linkages must also be part of the conservation reserve system.

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5/31/2011	CBD, Ilene Anderson	3, Conservation Planning Process	Section III.A, page III-3, 1st bullet	While we support maximizing the conservation area size, we note that existing conservation investments already occur within the boundary of the DRECP. The document need to clarify that these existing investments (ie. 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.
5/31/2011	CBD, Ilene Anderson	3, Conservation Planning Process	Section III.A, page III-3, 2nd bullet	In the "Maintain Connectivity" section – Connectivity in light of climate change scenarios needs to be included here also
5/31/2011	CBD, Ilene Anderson	3, Conservation Planning Process	Section III.A, page III-4, 1st bullet	In the "Minimize Edge" 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 is not appropriate to only protect these linear features, but to also include the hydrological functions of the upland areas.
5/31/2011	CBD, Ilene Anderson	3, Conservation Planning Process	Section III.A, page III-4, 3rd bullet	In the "Target Areas with Limited Access" 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".
5/31/2011	CBD, Ilene Anderson	3, Conservation Planning Process	Section III.A, pages III-4.5, 1st bullet	In the "Buffer Urban and Rural Impacts" 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.
5/31/2011	CBD, Ilene Anderson	3, Conservation Planning Process	Section III.A, pages III-4.5, 1st bullet	In the "Preserve Irreplaceable and Threatened Resources" section - The whole conservation reserve system should protect these resources, not just the conservation areas.
5/31/2011	CBD, Ilene Anderson	3, Conservation Planning Process	Section III.A, page III-7, Table III-1	Couple of issues: 1) reference to the definition of "protected land status" should refer to chapter 2 (and see above comments) 2) seems like all lands could benefit from restoration/enhanced management. 3) Check w/BLM as per opportunity for permanent protection – in the past where projects have identified sensitive resources and avoided them, BLM regulations prevent these areas from being set aside to protect resources if they are outside of an already "protected" area.
5/31/2011	CBD, Ilene Anderson	3, Conservation Planning Process	Section II.B.2, page III-10, Table III-5	Plants conservation evaluation should not be based on occurrences only (primarily because all suitable habitat has not been surveyed for these species), but instead on suitable habitat.
5/31/2011	CBD, Ilene Anderson	3, Conservation Planning Process	Section II.B.2, page III-11, Figure III-1	this map seems off...there is more suitable habitat based on the USGS habitat model, and it seems like there is definitely more habitat in the state and national parks than seem to be represented here. All DOD lands are "unprotected" for long-term conservation due to conflicts with military mission (and not just for desert tortoise conservation).
5/31/2011	CBD, Ilene Anderson	3, Conservation Planning Process	Section II.B.2, page III-12, Figure III-2	This map needs to include more than just the MGS core areas. It should evaluate the whole range of the species and include the BLM designated MGS conservation area.
5/31/2011	CBD, Ilene Anderson	3, Conservation Planning Process	Section II.B.2, pages III-13-15, Figure III-3-5	The plant maps should include all habitat, not just occurrences for the reasons discussed above.
5/31/2011	CBD, Ilene Anderson	3, Conservation Planning Process	Section III.C.2, page III-21, Table 3-8	1) No Draft West Mojave Plan is available. 2) The Flat-tailed horned lizard Rangewide Management Strategy does not address California condor conservation.

DRAFT - October 26, 2011  
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5/31/2011	CBD, Ilene Anderson	3, Conservation Planning Process	General	Issues not included in the Draft Conservation Area Design and Assembly chapter that need to be included: <input type="checkbox"/> Include well-distributed conservation of species across their range. <input type="checkbox"/> Highly fluctuating populations need adequate protected habitat to allow for natural boom-bust population dynamics to continue to occur. This dynamic needs to be captured in the reserve design, especially in light of climate change. <input type="checkbox"/> Peripheral populations need top priority for protection, because of all the genetic benefits they provide to species as a whole. <input type="checkbox"/> Needs to assure a net gain in habitat values occurs for species, and a net gain in population sizes for current TES species.
5/31/2011	CBD, Ilene Anderson	4, Conservation Strategy	Section IV.B.2, page IV-9, Goal 2-7	Add an additional Objective 2-7.3. Protect all sand transport corridors. This protection is necessary in order to fully protect the dunes ecosystem and has been a failure of an HCP in the area.
5/31/2011	CBD, Ilene Anderson	4, Conservation Strategy	Section IV.B.3, page IV-11, Objective 3-10.1.1	Facilities should be sited out of occupied desert bighorn sheep habitat throughout bighorn range which includes the Colorado desert too.
5/31/2011	CBD, Ilene Anderson	4, Conservation Strategy	Section IV.B.3, page IV-11, Objective 3-10.1.2	Facilities should not be placed in movement corridors which will cause further fragmentation of the habitat.
5/31/2011	CBD, Ilene Anderson	4, Conservation Strategy	Section IV.B.3, page IV-12, Goal 3-10.2.1	Add Objective 3-10.2.3 Re-establish historic linkages that have been compromised by anthropogenic development. Install land bridges to facilitate movement, maintain genetic diversity and climate change adaptation strategy.
5/31/2011	CBD, Ilene Anderson	4, Conservation Strategy	Section IV.B.3, page IV-15, Goal 3-12.1	Add Objective 3-12.1.8 Protect shallow aquifer that these plants rely on from groundwater pumping
5/31/2011	CBD, Ilene Anderson	4, Conservation Strategy	Goals for Plants	Add objective to establish off-site seed-bank storage
5/31/2011	CBD, Ilene Anderson	App A	General	Please include a discussion of and maps of Unusual Plant Assemblages (UPAs) as identified by BLM in the 1980 CDCA Plan.
5/31/2011	CBD, Ilene Anderson	App A	General	Some of the plant communities seem wrong, and are likely a factor of the land cover map being used as a vegetation community map. For example, A1.2.4 Rocky Mountain Subalpine Mesic Spruce-Fir Forest and Woodland or A1.5.1 California Central Valley and Southern Coastal Grassland or A1.8.1 Mediterranean California Southern Coastal Dune
5/31/2011	CBD, Ilene Anderson	App A	General	A number of the species in Appendix A have federal recovery plans or management plans that include recovery strategies. These strategies should be included as goals for the DRECP and should be clearly laid out in the text of the document.
5/31/2011	CBD, Ilene Anderson	App A	Figure A3.2-1	There is more current distribution maps for the tortoise which need to be included.
5/31/2011	CBD, Ilene Anderson	App A	Figures S-2 through S-14	As mentioned with the plants above, occurrence maps are a factor of where someone has looked. Maps indicating habitat are more appropriate.
5/31/2011	CBD, Ilene Anderson	App A	Section 55, Figure A3.2.2	The USFWS – Desert Tortoise Recovery Office has a much more sophisticated model of tortoise threats/stressors, and although it is not yet comprehensive, it is more appropriate than this figure
5/31/2011	CBD, Ilene Anderson	App A	Section 59, paragraph 4	The 2008 Recovery Plan update is deeply flawed and has not been adopted. We strongly advise that the current existing final Recovery Plan (1994) goals be incorporated into this section and be used as a basis for desert tortoise recovery in the DRECP
5/31/2011	CBD, Ilene Anderson	App A	Figure S-5	USFWS has data on condor use of the DRECP areas
5/31/2011	CBD, Ilene Anderson	App A	Figure S-6	BLM/CEC has much more data on golden eagle nests and territories
5/31/2011	CBD, Ilene Anderson	App A	Section 130, paragraph 1	The information from the MGS conservation strategy should be included in this section.
5/31/2011	CBD, Ilene Anderson	App A	Section A3.8	Clarity needs to be provided between the strategies for the listed population of peninsular bighorn sheep and desert bighorn
5/31/2011	CBD, Ilene Anderson	App A	Section A3.9	The most recent version of the FTHL Rangewide Management Strategy is 2003.
6/1/2011	CEERT	General	General	1. Development Plan Proposal – The DRECP’s goal to develop renewable energy in the California Desert should be reflected in the work products and timeline of the DRECP. We therefore suggest the addition of a development plan, while separate, parallels the conservation plan’s track and timeline. And in the development plan we suggest the following items be produced or re-analyzed in an effort to catch the track and timeline up to the conservation plan. a. Gap Analysis b. Disturbance Analysis c. High/Low Development Potential Map d. Development Principles
6/1/2011	CEERT	General	General	2. Integration of the conservation plan and development plan – once the two tracks are created they will need to be integrated. This critical discussion needs to be started and we need to start to understand how this will happen, so all stakeholders that are not agencies can start to see how the plan will function.
6/1/2011	CEERT	General	General	3. Phased approach to the DRECP – We do not suggest that areas be prematurely declared as non-development area, but we do suggest that some areas should receive a more in-depth analysis first. Previously CEERT suggested looking at the 2.5 million acres in the West Mojave. Most important is to develop a smaller area where success can be demonstrated for siting facilities and resolving species issues. Therefore a first step could be to look at about 300,000 acres in the West Mojave to try and find a few projects worth of early areas that could be designated as development zones quickly. a. Species list for just first phase b. Covered activities list for just first phase c. Resources Maps for first phase
6/1/2011	CEERT	General	General	4. Acreage Calculator – (Needs to be reviewed for specific comment) – Generally CEERT sees 66% as the next goal beyond 2020. And independent of the specific goal and timeframe that is settled on for the DRECP the acreage cap on development should be expansive enough to ensure it does not directly or indirectly restrict the potential solar or wind markets of the future.

DRAFT - October 26, 2011  
**Appendix E**  
**Stakeholder Comment Matrix**

<b>Framework Conservation Strategy Report Comment Matrix</b>				
Comment Date	Commenter	Location/Chapter	Section, Subsection, Paragraph, Sentence	Comment or Issue
5/31/2011	CNPS, Greg Suba	2, Environmental Setting	Section A, page II-1, paragraph 2	The last sentence refers to, "companion DRECP environmental document." Is this referring to Appendix B? or something else we already have received, or is it something still to come?
5/31/2011	CNPS, Greg Suba	2, Environmental Setting	Section II.A.1, page II-2, paragraph 7	Please consider our comment on semantics and the use of the phrase "vegetation community" unevenly throughout the draft document. "Vegetation" is a group of plants living together in a place. "Community" is a group of organisms living together in a place. "Vegetation community" is redundant and is used as the predominant wording throughout the document to describe vegetation types, or vegetation. At times "vegetation type" is used. CNPS recommends adopting the convention used by Sawyer et al. (2008) in A Manual of California Vegetation and replace all uses of "vegetation community" with simply "vegetation" and/or "vegetation type(s)." "Plant community" would also work (and is sometimes used in the draft document, e.g., p. II-24).  This redundancy is avoided in the definition of Natural Communities on p. II-3, by using "vegetation types" and represents the wording that should be employed throughout the rest of the document.
5/31/2011	CNPS, Greg Suba	2, Environmental Setting	A.1, II-3, paragraph 6	re: Definition of Initial Land Cover Map: edit definition to include "initial" as follows, "...that will be used in development of the initial DRECP framework conservation strategy." CNPS remains concerned that the value of the HCP/NCCP will be compromised by the lack of accurate information inherent in the Initial LandCover Map should the initial map remain the default information upon which we define targets for conservation and management efforts.  Broad-scale vegetation types, such as the aggregate types developed as per the methods used to create the DRECP Initial Land Cover Map, may over- or underestimate the value of areas as target conservation habitat or development areas. The more detailed, quantitatively based vegetation maps being developed for the Western Mojave (and hopefully other areas to the east and south), and being revised to some degree for the Central Mojave, can more accurately differentiate suitable conservation / development areas and avoid the need for costly Plan reiterations.
5/31/2011	CNPA, Greg Suba	2, Environmental Setting	II.B.3, II-10, paragraph 1	re: "[surficial geology] will be critical for maintaining and restoring native communities."  The restoration of desert vegetation occurs on the order of many decades to centuries (i.e., well beyond the term of the DRECP) because of the "strong dependence...on surficial geology" noted in the report, especially in locations where restoration of desert pavements and/or cryptogamic crusts would be necessary. The DRECP framework strategy should mention this condition when referencing restoration of desert native communities as a conservation strategy in order to clarify timeframes and avoid overly-optimistic expectations of the reliability of desert "native community restoration" as a conservation or mitigation measure.
5/31/2011	CNPS, Greg Suba	2, Environmental Setting	Section II.B.4, page II-21, paragraph 1, 4th sentence	4th sentence = typo. Change "sediments" to "sediment"
5/31/2011	CNPS, Greg Suba	2, Environmental Setting	Section II.B.4, page II-26, paragraph 1	Not certain why "Natural Communities and Vegetation Types" is in section II.B.4 Hydrology? perhaps it should be its own section II.B.5?
5/31/2011	CNPS, Greg Suba	2, Environmental Setting	Section II.B.4, page II-26, paragraph 2	re: "While current and fine... many regional and landscape-scale analyses can be conducted with mid-scale resolution land cover data, as is available in the DRECP Initial Land Cover Map..."  Examples of types of "regional and landscape-scale analyses" being referred to here would be useful in clarifying to what extent the Initial Land Cover Maps will be used. Much of our concerns are based on lack of clarity regarding what types of decisions we will be making using the Initial Land Cover Map, how those initial decisions will be re-analyzed when less broad-scale and more spatially-accurate maps are available, and who will perform the re-analyses? e.g., of vegetation distributions, and habitat / species distribution models using the updated maps?
5/31/2011	CNPS, Greg Suba	2, Environmental Setting	Section II.B.4, page II-26, paragraph 2	re: "Therefore, the DRECP...will rely on ...Initial Land Cover Map...until a comprehensive alliance-level vegetation...layer is available."  This would be the place to state what happens once the finer-scale vegetation layer is available. For example, "At which time models will be re-run, results analyzed, and changes integrated into the conservation strategy by DRECP consultants and then subject to review by independent science experts."
5/31/2011	CNPS, Greg Suba	2, Environmental Setting	Section II.B.4, page II-26, paragraph 3	Edit the last sentence as follows: "Additional existing...and ongoing land cover mapping will be incorporated into the land cover database, and integrated into conservation strategy decisions, as the new mapping data becomes available."  To clarify that new information will not only be added to a list, but will also be used in decision making.

DRAFT - October 26, 2011  
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5/31/2011	CNPS, Greg Suba	2, Environmental Setting	Section II.B.4, page II-26, paragraph 3	<p>re: "Additional existing smaller scale land cover maps are...for focused conservation planning decisions and land cover quantification when feasible,...."</p> <p>There are desert vegetation types that are themselves rare. Within the Mojave Desert there are over 100 rare (Natural Heritage Rank S1-S3) vegetation Alliances and Associations, we provide a list of these in spreadsheet attached to our comments. These rare types occur in smaller stands, sometimes on the scale of 2 acres or less. These rare types, especially those recognized with a State Heritage Rank of S1 or S2, must be addressed in conservation planning decisions regardless of what is considered "feasible."</p>
5/31/2011	CNPS, Greg Suba	2, Environmental Setting	Section II.C.3, page II-37, paragraph 1	<p>re: "...that can be used to inform many regional and landscape-scale conservation planning decisions,...."</p> <p>see comment #7.</p>
5/31/2011	CNPS, Greg Suba	2, Environmental Setting	Section II.C.3, page II-37, paragraph 2	<p>BLM's Unusual Plant Assemblages (UPA's) should be added to the Supplemental Land Cover Data Sources.</p> <p>A map of BLM UPAs is provided on p. 52 of the Vegetation Element of the 1980 BLM CDCA Plan (Part I, Chapter 3, pp. 41-52), and general descriptions including sensitivity classifications, and Management Options are included in the CDCA Report's Appendix X (Appendix X, Part 4 (pp. 109-115)).</p> <p>Please find a copy of the map and Appendix X attached with our comment form.</p>
5/31/2011	CNPA, Greg Suba	2, Environmental Setting	Section II.D.3.2, page II-108, paragraph 2	<p>re: "...identify which natural communities and species are already well protected by existing ownership and land management activities (Types 1,2, and 3),...."</p> <p>CNPS feels that a GAP analysis that identifies species and natural communities occurring on Type 3 lands as "already well protected" by existing ownership / land management activities will overestimate the protected areas in the plan area. For example, several renewable energy project applications, approved and pending, and solar energy zones (SEZ's) occur on Type 3 lands (e.g., the Ivanpah and Calico projects, the Iron Mountain and Pisgah SEZs) and represent examples of places that cannot be considered as "already well protected" based on land management practices and planning processes.</p> <p>We feel Type 3 lands must be differentiated from Type 1 &amp; 2 lands for the purposes of GAP analysis.</p>
5/31/2011	CNPS, Greg Suba	3, Conservation Planning Process	Section III.A, page III-2, paragraph 1	<p>re: "Information on species...will inform the conservation reserve system design process."</p> <p>CNPS will be submitting additional information regarding candidate Covered / Planning plant taxa in response to the recently distributed review list (Working Review of DRECP CS List 25May2011_bh_saf.xlsx).</p>
5/31/2011	CNPS, Greg Suba	3, Conservation Planning Process	Section III.A, page III-2, paragraph 2	<p>re: "For example, at a small scale, conservation areas must contain the microhabitats and other resources necessary for local species populations to survive."</p> <p>CNPS agrees with this principle. In order to achieve conservation of these small scale features, it is necessary to know where small scale microhabitats and other resources occur across the planning area. This underscores the necessity of developing a land cover layer that resolves finer-scale features (e.g., like the MDEP Special Features layer) that the current broad-scale land cover map does not resolve. Section 3.1.2 of the DRECP Independent Science Advisors Recommendations report (p.50) addresses the need to include special features in the plan's land cover map, "to identify spatially explicit units for conservation which would otherwise not be shown" on the land cover map.</p>
5/31/2011	CNPS, Greg Suba	3, Conservation Planning Process	Section III.B.1, page III-6, paragraph 3	<p>re: "Identify resource that are already protected by existing ownership and land management activities (types 1,2, and 3)...."</p> <p>see comment #13.</p>

DRAFT - October 26, 2011  
**Appendix E**  
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5/31/2011	CNPS, Greg Suba	3, Conservation Planning Process	Section III.B.2, page III-8, paragraph 1 (and Table III-2 footnote)	This preliminary analysis is useful for informing discussion of methods to be used in GAP analysis and planning, but the narrative should state explicitly that decisions regarding protection of species and natural communities based on these data would be premature since both data processing procedures (as stated in Table III-2 footnote), and new mapping information may result in revisions to these draft calculations. Total acreage and locations of natural communities will most likely change.
5/31/2011	CNPS, Greg Suba	3, Conservation Planning Process	Section III.B.2, page III-10, paragraph 1	re: "Although this analysis...lower survey effort."  This statement, though correct, is incomplete. It is equally true and relevant that plant occurrences can be underrepresented on lands with lower protection status and low survey effort. The narrative should be amended to clarify this point.
5/31/2011	CNPS, Greg Suba	4, Conservation Strategy	Section IV, page IV-1, paragraph 2	CNPS agrees that the types of conservatin measures and actions described in this chapter do not represent a "specific DRECP conservation strategy" because most of the objectives are general and vague. We will work with the Stakeholder Committee to ensure the development of more specific objectives.
5/31/2011	CNPS, Greg Suba	4, Conservation Strategy	Section IV, page IV-4, paragraphs 1 and 2	typo: Objectives 1-3.1 and 1-3.2 are the same.
5/31/2011	CNPS, Greg Suba	4, Conservation Strategy	Section IV, page IV-7, paragraph 2	Objective 2-4.2: is there a conservation advantage to specific faunal species to protecting "non-native grassland community vegetation types (introduced upland vegetation-forbland)"? If not, we do not understand the need to identify such areas as high conservation priority sites.
5/31/2011	CNPS, Greg Suba	4, Conservation Strategy	Section IV, page IV-15, paragraph 7	Objective 3-12,13,14.2.2: Implementation of this objective per se must not be considered a contribution to the recovery of target plants unless / until the expansion and persistence of experimental populations is proven successful.
5/27/2011	County of Inyo, Joshua Hart	General	General	I am particularly concerned about the Draft Conservation Strategy that has been developed that appears to ignore the County's previous input.
5/27/2011	County of Inyo, Joshua Hart	4, Conservation Strategy	Section IV.B.3, page IV-13, Objective 3-11.1.1	For example, Objective 3-11.1.1 regarding Mohave ground squirrel on page IV -13 of the Draft Conservation Strategy states that it is an objective to "site facilities outside of the four core areas identified by Leitner (2008) to the extent feasible and practicable, including the Coso Range-Olancha Core Area ... ". Some of the few remaining areas held in private ownership in Inyo County lie within the identified Coso Range-Olancha Core Area ... ". Some of the few remaining areas held in private ownership in Inyo County lie within the identified Coso Range-Olancha Core Area, as well as some of the most suitable areas for renewable energy development. (refer to <a href="http://inyoplanning.org/RenewableNewPage.htm">http://inyoplanning.org/RenewableNewPage.htm</a> regarding the County's renewable energy planning efforts).
5/27/2011	County of Inyo, Joshua Hart	4, Conservation Strategy	Section IV.B.3, page IV-14, Objective 3-11.2.1	I am also concerned about Objective 3-11.2.1 on page IV -14 of the Draft Conservation Strategy, which states "acquire _ acres of modeled suitable habitat for Mohave ground squirrel through fee title of unprotected areas identified in the DRECP conservation strategy as high priority to contribute to the establishment of permanent core reserves or linkage areas for the species." I would anticipate much opposition locally to establishing more preservation areas than have already been designated, particularly any that would eliminate more private lands.
5/27/2011	County of Inyo, Joshua Hart	General	General	Author attaches previous letter sent on March 31, 2010, regarding Desert Renewable Energy Conservation Plan Conservation Area Starting Points
5/31/2011	Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audobon, and Friends of the Desert Mountains; Kim Delfino and Jeff Aardahl	Executive Summary	pages 5-8	It is good to note the comments received on various documents, but we would recommend that in the next iteration of these documents that a disposition table is created to indicate how comments have been addressed.
5/31/2011	Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audobon, and Friends of the Desert Mountains; Kim Delfino and Jeff Aardahl	1, Intro	Section I.B, page I-5	We do not support the goal of "building" upon the Compatible Renewable Energy Zones (CREZ) identified by RETI as these zones have some significant issues with them and were not identified with the proper resource filters. We would support further rigorous analysis of these areas, which may result in some CREZs being deleted from consideration and some CREZs being folded into future development areas.
5/31/2011	Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audobon, and Friends of the Desert Mountains; Kim Delfino and Jeff Aardahl	1, Intro	Section I.C.4, pages I-11 through I-12	The Covered Species list need extensive work and refinement. We strongly urge the inclusion of desert bighorn sheep as a covered species. We will provide additional comments regarding covered species in response to the covered species documents just released to the covered species workgroup for evaluation and comment.
5/31/2011	Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audobon, and Friends of the Desert Mountains; Kim Delfino and Jeff Aardahl	1, Intro	Section I.C.5, page I-13	RPS Biomass projects is not an activity type to be covered by the DRECP. This activity was rejected by the Covered Activities workgroup.
5/31/2011	Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audobon, and Friends of the Desert Mountains; Kim Delfino and Jeff Aardahl	2, Environmental Setting	Section II.B.4, page II-22, paragraph 2	The description of the Salton Sea should include recent projections for the decline in the Sea beginning in 2017 after the mitigation water from the IID water transfer ends. Starting in 2017, the Salton Sea will become much more saline and the miles of shoreline will become exposed as the Sea recedes.
5/31/2011	Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audobon, and Friends of the Desert Mountains; Kim Delfino and Jeff Aardahl	2, Environmental Setting	Section II.C.4	Overall comment – there only reference to habitat used by desert bighorn sheep is on the "Rocky, Barren and Unvegetated Habitat Community. " Bighorn sheep utilize more diverse habitat that noted in the framework document.

**Appendix E**  
**Stakeholder Comment Matrix**

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5/31/2011	Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audobon, and Friends of the Desert Mountains; Kim Delfino and Jeff Aardahl	2, Environmental Setting	Section II.C.4, page II-70, paragraph 3	This report needs to include the more recent surveys by the Imperial Irrigation District for Burrowing Owl. The surveys by the Imperial Irrigation District show the burrowing owl population has dropped from about 5,600 pairs in the early 1990s to 4,879 pairs in 2007 and 3,557 pairs in 2008.
5/31/2011	Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audobon, and Friends of the Desert Mountains; Kim Delfino and Jeff Aardahl	2, Environmental Setting	Page II-94, paragraph 1	Bureau of Land Management (BLM): Clarify that BLM manages publically owned lands. BLM is not the landowner.  Department of Defense (DOD): Most of lands within DOD installations are public lands withdrawn by Congress for exclusive use by DOD agencies. In these situations, DOD does not the landowner.
5/31/2011	Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audobon, and Friends of the Desert Mountains; Kim Delfino and Jeff Aardahl	2, Environmental Setting	Page 105, Table 2-11	Type 1 Lands, BLM: National Natural Area classification needs verification. BLM has designated various Natural Areas in the planning area (e.g., Afton Canyon Natural Area, Desert Tortoise Research Natural Area, Amboy Crater Natural Area, Rainbow Basin Natural Area, and Amargosa River Natural Area). These areas have been designated as Areas of Critical Environmental Concern. However, their Type 1 classification is questionable unless the lands have been withdrawn from use associated with land and mining uses. Request BLM to determine if public lands in these areas have been withdrawn from uses associated with rights of way and mining laws. If they haven't been withdrawn then their classification needs to be adjusted to Type 2 because they have been designated as Areas of Critical Environmental Concern by BLM.
5/31/2011	Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audobon, and Friends of the Desert Mountains; Kim Delfino and Jeff Aardahl	2, Environmental Setting	Page II-105, Table 2-11	Type 2 Lands, BLM: Wilderness Study Areas should be included in this category because they are managed under protective provisions of FLPMA pending Congressional action on wilderness designation.
5/31/2011	Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audobon, and Friends of the Desert Mountains; Kim Delfino and Jeff Aardahl	2, Environmental Setting	Page II-105, Table 2-11	Type 2 lands, BLM: "Natural Preserve" classification doesn't apply Type 2 lands, BLM: "Wildlife Area" classification may not apply – please check with BLM. If this classification is meant for Wildlife Habitat Management Plan Areas, they should be Type 3 lands because they have no regulatory or statutory protection from incompatible land uses.
5/31/2011	Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audobon, and Friends of the Desert Mountains; Kim Delfino and Jeff Aardahl	2, Environmental Setting	Section II.D.3.2, page II-107	Type 3 lands, BLM: There is some uncertainty of these lands remaining in a relatively undeveloped status. If they are open to multiple uses under federal land and mining laws they will continue to be subject to development. Examples are the numerous large-scale solar, wind and geothermal power projects, transmission lines and other facilities authorized by BLM under rights of way as per FLPMA, Title V. These lands may be more appropriately categorized as Type 4 (unprotected). Please discuss with BLM and other agencies on the planning team and revise if necessary.
5/31/2011	Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audobon, and Friends of the Desert Mountains; Kim Delfino and Jeff Aardahl	2, Environmental Setting	Section II.D.3.2, page 108	Application of Protected Area Classification to the Conservation Strategy: Communities and species falling into Type 3, and possible Type 2, public lands under BLM management are not "well protected." Suggest revising and indicating that Type 1 lands are well protected, Type 2 lands are moderately protected in some cases, and that Type 3 lands are not protected. As noted above, please determine if Type 3 lands should be placed in Type 4 (unprotected).
5/31/2011	Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audobon, and Friends of the Desert Mountains; Kim Delfino and Jeff Aardahl	2, Environmental Setting	Section II.D.3.1, page II-107, paragraph 2	Type 1 protected areas may serve as core areas for DRECP conservation goals only to the degree that further analysis of these areas demonstrates that they are important to meeting the biological goal and objectives of the conservation plan.
5/31/2011	Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audobon, and Friends of the Desert Mountains; Kim Delfino and Jeff Aardahl	2, Environmental Setting	Section II.D.3.1, page II-107, paragraph 3	Any area designated as part of the conservation strategy must have permanent protections in place for the species and habitats that are supposed to benefit from those lands.
5/31/2011	Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audobon, and Friends of the Desert Mountains; Kim Delfino and Jeff Aardahl	2, Environmental Setting	Section II.D.3.1, II-107, paragraph 4	Type 3 managed open space lands cannot be reasonably expected to remain intact for the foreseeable future as they do not have any protections in place. As we have seen with the rush of solar and wind applications on these lands, these areas are subject to extensive development pressures.
5/31/2011	Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audobon, and Friends of the Desert Mountains; Kim Delfino and Jeff Aardahl	2, Environmental Setting	Section II.D.3.1, page II-108, paragraph 1	It is not clear what the intent is for Type 4 lands. These areas should be considered for the conservation strategy to the extent they fulfill the biological goals and objectives of the plan and can be subsequently permanently protected.
5/31/2011	Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audobon, and Friends of the Desert Mountains; Kim Delfino and Jeff Aardahl	3, Conservation Planning Process	Section III.A, page III-1, paragraph 2	The discussion of "conservation areas" and the conservation strategy needs to be more definitive. The conservation strategy "will" be implemented with conservation areas and "will" include a variety of conservation actions. Further, there needs to be a definition of what is a "conservation area." Also, the discussion of the "conservation reserve system" needs to note that the conservation areas and actions will be in-perpetuity.
5/31/2011	Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audobon, and Friends of the Desert Mountains; Kim Delfino and Jeff Aardahl	3, Conservation Planning Process	Section III.A, page III-3, paragraph 3	The discussion re: maintaining connectivity needs to include a discussion about what to do in the face of climate change.
5/31/2011	Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audobon, and Friends of the Desert Mountains; Kim Delfino and Jeff Aardahl	3, Conservation Planning Process	Section III.A, page III-1, paragraph 1	Conservation design and principles: For lands managed by public agencies, such as BLM and DOD, effective conservation outcomes will necessitate that appropriate and lasting conservation assurances on certain lands managed by BLM and DOD that contain significant natural communities and species are part of the planning strategy. Please determine to what extent such assurances can and will be provided so that this aspect of the planning strategy can be verified. In addition, the planning strategy involving BLM and DOD lands should specify the types of assurances that can be applied and their duration or longevity.

**Appendix E  
Stakeholder Comment Matrix**

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5/31/2011	Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audobon, and Friends of the Desert Mountains; Kim Delfino and Jeff Aardahl	3, Conservation Planning Process	Section III.B.1, 6, paragraph 1	Gap Analysis - Methods: The accuracy and reliability of the Gap Analysis require that the actual degree of lasting protection for Type 1, 2 and 3 protection categories be reviewed and revised, as necessary, especially for public lands managed by BLM. Many of the Type 3 public lands under BLM management have little or no long-term protection and may more appropriately fall under the Type 4 or unprotected land status. Although BLM lands in the California Desert Conservation Area that are subject to multiple uses are managed under "multiple use, sustained and maintenance of environmental quality" provisions of FLPMA, those provisions, as implemented by BLM, do not ensure long-term integrity of natural communities.
5/31/2011	Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audobon, and Friends of the Desert Mountains; Kim Delfino and Jeff Aardahl	3, Conservation Planning Process	Section III.C, page 17	General comment on Existing Conservation Planning Documents: A summary of "conservation actions" contained in 28 existing planning documents for the 14 currently covered species is presented. It is essential that the planning team include actual conservation actions that directly conserve the covered species and their habitats. The list contains numerous plans, many of which may be more appropriately categorized as impact mitigation and take minimization strategies, which are not necessarily conservation oriented. Also, plans, by themselves, should not be considered conservation actions. Some plans may contain recommended conservation actions, but until such actions are implemented, the plans cannot be considered effective. Please provide a more accurate definition of what constitutes a "conservation action" and carefully examine the 28 existing plans and extract only actual conservation actions they contain.
5/31/2011	Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audobon, and Friends of the Desert Mountains; Kim Delfino and Jeff Aardahl	3, Conservation Planning Process	Section III.C, page 18	Table III-7 Status of Conservation Documents: Some of the documents listed are not plans, but rather environmental analyses of unspecified plans (e.g., China Lake NAWS EIS; Supplemental Final EIS, National Training Center, Fort Irwin). Please identify the actual plan rather than the environmental document that assesses the effects of a plan. As in the comment above, please carefully determine whether or not a reported "conservation plan" should be more appropriately categorized as an impact mitigation and take minimization plan.
5/31/2011	Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audobon, and Friends of the Desert Mountains; Kim Delfino and Jeff Aardahl	3, Conservation Planning Process	Section III.C, page 18	Table III-9 (Species): Conservation Actions: In describing conservation actions, please differentiate between actual actions, impact mitigation and take minimization, and plans. Only some of the actions are conservation oriented. Examples from the list that are actual conservation actions include "Permanently remove bullfrogs and other exotic species that prey upon or displace listed species" and "Close non-essential or redundant routes, especially within tortoise conservation areas and set a minimum goal of "no net gain" of roads in tortoise conservation areas." Others are impact mitigation and take minimization oriented, such as "Relocate desert tortoises out of harm's way before activities likely to create direct impacts" and "Implement worker education and other procedures in accordance with the 2003 Flat-Tailed Horned Lizard Interagency Coordinating Committee recommendations." Other actions include development of plans which may or may not contain actual conservation actions, such as "Perform habitat assessments (in priority order established by Sonoran Bird Conservation Plan)" and "Work with tribes to develop conservation plans and strategies to realize the considerable potential for conservation and recovery on tribal lands."
5/31/2011	Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audobon, and Friends of the Desert Mountains; Kim Delfino and Jeff Aardahl	3, Conservation Planning Process	Section III.A, page III-4, paragraph 1	In the "Minimize Edge" 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.
5/31/2011	Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audobon, and Friends of the Desert Mountains; Kim Delfino and Jeff Aardahl	3, Conservation Planning Process	Section III.A, page III-4	In the "Target Areas with Limited Access" 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 managed 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".
5/31/2011	Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audobon, and Friends of the Desert Mountains; Kim Delfino and Jeff Aardahl	3, Conservation Planning Process	Section III.A, page III-4	In the "Buffer Urban and Rural Impacts" 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
5/31/2011	Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audobon, and Friends of the Desert Mountains; Kim Delfino and Jeff Aardahl	3, Conservation Planning Process	Section III.A, page III-5	There is no discussion of the need to protect and conserve sand sources.

**Appendix E**  
**Stakeholder Comment Matrix**

Framework Conservation Strategy Report Comment Matrix				
Comment Date	Commenter	Location/Chapter	Section, Subsection, Paragraph, Sentence	Comment or Issue
5/31/2011	Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audobon, and Friends of the Desert Mountains; Kim Delfino and Jeff Aardahl	3, Conservation Planning Process	Section 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 acreage and percentage of habitats in the 4 land types.
5/31/2011	Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audobon, and Friends of the Desert Mountains; Kim Delfino and Jeff Aardahl	3, Conservation Planning Process	Section III.B.2, page III-7	The Mohave ground squirrel core habitat and known populations should also include key linkage areas and historic range to accommodate population fluctuations.
5/31/2011	Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audobon, and Friends of the Desert Mountains; Kim Delfino and Jeff Aardahl	3, Conservation Planning Process	Section III.C, pages III-17 through III-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.
5/31/2011	Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audobon, and Friends of the Desert Mountains; Kim Delfino and Jeff Aardahl	4, Conservation Strategy	Section IV.B	Overall comment – The objectives for this section are far too vague and fails to provide the specificity necessary to create a robust and meaningful adaptive management program. We would direct the authors of this framework to read a recent article regarding the need for greater specificity in conservation planning objectives – See, Franklin, J., et al, "Planning, Implementing, and Monitoring Multiple-species Habitat Conservation Plans," American Journal of Botany 98(3): 559-571 (2011).
5/31/2011	Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audobon, and Friends of the Desert Mountains; Kim Delfino and Jeff Aardahl	4, Conservation Strategy	Section IV.B.1, page IV-3	Objectives 1–1.2: What "avoidance and minimization" measures are to be applied? What are the "most sensitive" natural communities and species habitats?
5/31/2011	Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audobon, and Friends of the Desert Mountains; Kim Delfino and Jeff Aardahl	4, Conservation Strategy	Section IV.B.1, page IV-3	Objectives 1–1.3: What "broad, unfragmented environmental gradients" are to be protected? To what level are you "maximizing" habitat heterogeneity?
5/31/2011	Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audobon, and Friends of the Desert Mountains; Kim Delfino and Jeff Aardahl	4, Conservation Strategy	Section IV.B.1, page IV-3	Objectives 1–2.1: What processes are "important" for formation of surficial geology and which ones are to be protected?
5/31/2011	Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audobon, and Friends of the Desert Mountains; Kim Delfino and Jeff Aardahl	4, Conservation Strategy	Section IV.B.1, page IV-4	Objective 1.4.2: To what level will cover, biomass and non-native species will be eradicated or reduced?
5/31/2011	Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audobon, and Friends of the Desert Mountains; Kim Delfino and Jeff Aardahl	4, Conservation Strategy	Section IV.B.2, pages IV-4 through IV-10	This section is too many vague objectives. Further, it seems like the various community sections are lumped together and the specific community types that make us a forest community or a woodland community, for example, are lumped into one objective.
5/31/2011	Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audobon, and Friends of the Desert Mountains; Kim Delfino and Jeff Aardahl	4, Conservation Strategy	Section IV.B.3, pages 10 through 18	We are going to assume that the species biological goals and objectives section is merely a placeholder since it is plagued with vagueness.
5/31/2011	Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audobon, and Friends of the Desert Mountains; Kim Delfino and Jeff Aardahl	4, Conservation Strategy	Section IV.B.1, page 3	Objective 1-1.2: The most sensitive natural communities and species habitats 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.
5/31/2011	Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audobon, and Friends of the Desert Mountains; Kim Delfino and Jeff Aardahl	4, Conservation Strategy	Section IV.B.1, page 3	Under Protect and Maintain Ecosystem Processes, please add:  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.  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.  Objective 1-1.5 - Water quality complies with State water quality standards.  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.

**Appendix E**  
**Stakeholder Comment Matrix**

<b>Framework Conservation Strategy Report Comment Matrix</b>				
<b>Comment Date</b>	<b>Commenter</b>	<b>Location/Chapter</b>	<b>Section, Subsection, Paragraph, Sentence</b>	<b>Comment or Issue</b>
5/31/2011	Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audobon, and Friends of the Desert Mountains; Kim Delfino and Jeff Aardahl	4, Conservation Strategy	Section IV.B.1, page 4	Objectives 1-3.1 and 1-3.2: 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.
5/31/2011	Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audobon, and Friends of the Desert Mountains; Kim Delfino and Jeff Aardahl	4, Conservation Strategy	Section IV.B.2, page 4-6	Woodland Community: Please include Microphyl Woodlands associated with washes in the eastern Mojave, Colorado and Sonoran Deserts within the DRECP Planning Area.
5/31/2011	Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audobon, and Friends of the Desert Mountains; Kim Delfino and Jeff Aardahl	4, Conservation Strategy	Section IV.B.2, page 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?
5/31/2011	Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audobon, and Friends of the Desert Mountains; Kim Delfino and Jeff Aardahl	4, Conservation Strategy	Section IV.B.3, page 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)
5/31/2011	Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audobon, and Friends of the Desert Mountains; Kim Delfino and Jeff Aardahl	4, Conservation Strategy	Section IV.B.3, page 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.
5/31/2011	Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audobon, and Friends of the Desert Mountains; Kim Delfino and Jeff Aardahl	4, Conservation Strategy	Section IV.B.3, page 14-15	Desert Cymopterus: Documented populations and suitable habitat should be strictly avoided, without consideration whether or not such avoidance is "feasible and practicable.")
5/31/2011	Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audobon, and Friends of the Desert Mountains; Kim Delfino and Jeff Aardahl	4, Conservation Strategy	Section IV.B.3, pages 16-17	Barstow Woolly Sunflower: Same comment as above.
5/31/2011	Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audobon, and Friends of the Desert Mountains; Kim Delfino and Jeff Aardahl	4, Conservation Strategy	Section IV.B.3, pages 17-18	Mojave Monkeyflower: Same comment as above.
5/31/2011	Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audobon, and Friends of the Desert Mountains; Kim Delfino and Jeff Aardahl	4, Conservation Strategy	Section IV.C, page 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.
5/31/2011	Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audobon, and Friends of the Desert Mountains; Kim Delfino and Jeff Aardahl	4, Conservation Strategy	Section IV.C, page 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.
5/31/2011	Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audobon, and Friends of the Desert Mountains; Kim Delfino and Jeff Aardahl	App A	Section 3.3	Bald Eagle: CDFG has unpublished observations of winter season Bald Eagles at Haiwee Reservoir, and possibly other locations in the Owens Valley region. Also contact the Los Angeles Department of Water and Power (Brian Tilemans, Biologist, at 760.873.0214 or <a href="mailto:Brian.Tilemans@water.ladwp.com">mailto:Brian.Tilemans@water.ladwp.com</a> )
5/31/2011	Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audobon, and Friends of the Desert Mountains; Kim Delfino and Jeff Aardahl	App A	Section 3.6	Golden Eagle: Potential foraging territories are displayed on Map No. 4 of the 1980 CDCA Plan. Helicopter surveys of raptors, including Golden Eagle, were conducted by BLM in 1977-1978 in support of the CDCA Plan of 1980. Contact Dr. Larry LaPre at BLM for site specific locality data. BLM surveyed portions of the Western Mojave for raptors in about 1984 as an update to the 1977-1978 survey. Focus was on Red Mountain-EI Paso Raptor Breeding Area. Contact Dr. Larry LaPre for site specific data. More recent Golden Eagle nesting territory surveys were conducted under contract in support of environmental reviews of proposed renewable energy projects: Solar-Calico, Ivanpah, Genesis, Palen, Desert Sunlight, Blythe; and Wind-Granite Mountains, Tule, Ocotillo, Daggett Ridge, Sand Ridge. Contact Dr. Larry LaPre for site specific data.

DRAFT - October 26, 2011  
**Appendix E**  
**Stakeholder Comment Matrix**

<b>Framework Conservation Strategy Report Comment Matrix</b>				
Comment Date	Commenter	Location/Chapter	Section, Subsection, Paragraph, Sentence	Comment or Issue
5/31/2011	Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audobon, and Friends of the Desert Mountains; Kim Delfino and Jeff Aardahl	App A	Section 3.7	Mohave Ground Squirrel: Unpublished BLM data based on live trapping studies in the Western Mojave conducted from 1974 through 1980 should be included in the species account. Contact Shelley Ellis, BLM Biologist at 760-384-5426, or Dr. Larry LaPre. Site specific live trapping data for the Coso and Rose Valley area of Inyo County are contained in the FEIS for Coso Geothermal Development, published by Rockwell International under BLM contract (Field Ecology Technical Report on the Coso Geothermal Study Area-Survey of Small Mammals and Carnivores in the Coso Geothermal Study Area, July 1979, by Phillip Leitner. Contact Jeff Aardahl for electronic copy of this report.  BLM published considerable information about this species in the West Mojave Plan and FEIS/EIR in January 2005 (See pages 3-144 through 3-169, and Appendix M-Mohave Ground Squirrel Background Data. Contact Jeff Aardahl for additional data on age and sex of individual Mohave Ground Squirrels trapped in the BLM 1980 field study. <b>CONTINUED BELOW</b>
5/31/2011	Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audobon, and Friends of the Desert Mountains; Kim Delfino and Jeff Aardahl	App A	Section 3.7	<b>CONTINUED FROM ABOVE...</b> Among the most recent publications on this species is a report published by CDFG: "West Mojave Desert Ecological Reserve, Final Biological Report, Sections 17 (Area 1), 5 (Area 2) and 3 (Area 3), Saddleback Mtn. and The Buttes Topographic Maps." The report documents studies on three square miles of CDFG reserve habitat in the Western Mojave for the Mohave Ground Squirrel, Desert Tortoise and rare plants. Contact Jeff Aardahl for an electronic copy of the report.
5/31/2011	Defenders of Wildlife, NRDC, California Council of Land Trusts, California Audobon, and Friends of the Desert Mountains; Kim Delfino and Jeff Aardahl	App A	Section 3.11	Southwestern Willow Flycatcher: BLM contracted for surveys of Willow Flycatchers and Bell's Vireos in 2001-2003 in support of a lawsuit settlement in the CDCA. Formal reports were submitted to BLM and protocol field surveys were conducted in many areas of the CDCA such as Indian Wells Canyon, Sand Canyon, Surprise Canyon, north slope San Bernardino Mountains, and some eastern Mojave locations. Contact Dr. Larry LaPre for copies of the reports.
5/31/2011	Pacific Coast and Central Valley Group, Chrissy Howell	2, Environmental Setting	Section II.C.3, page II-34, Initial Land Cover Map	What a lot of work to pull this all together! It would be great if they could provide a map the geographic extents of the sources of the veg/landcover data. I realize that the description in Table II-4 covers some of this, but I think it would be helpful to have it mapped out. If there were multiple sources of information for a given geography, which layers/data sets took precedence? Are there categories that some map sources overlook (e.g. riparian?). What is the source for the Urban data? There are a number of statewide and national sources that are particularly good for this info. For rural/urban they may want to look at the Upland data layer available from Jim Thorne at UC Davis.
5/31/2011	Pacific Coast and Central Valley Group, Chrissy Howell	2, Environmental Setting	Section, II.C.4, page II-45	What is the basis for these maps? Are these from the initial land cover map?
5/31/2011	Pacific Coast and Central Valley Group, Chrissy Howell	2, Environmental Setting	Section II.C.4, page II-45	Scientific names for birds are missing. This is a recurring issue throughout this chapter.
5/31/2011	Pacific Coast and Central Valley Group, Chrissy Howell	2, Environmental Setting	Section II.C.4, page II-63	Western Yellow-billed Cuckoos are also found in riparian habitat along the Colorado River. They are a state species of special concern and a candidate for federal listing.
5/31/2011	Pacific Coast and Central Valley Group, Chrissy Howell	2, Environmental Setting	Section II.C.4, page II-63	"Small 1974" is cited too often. There are other more recent citations. Also the "Birds of N. America" species accounts should be consulted when discussing the preferences of individual species.
5/31/2011	Pacific Coast and Central Valley Group, Chrissy Howell	2, Environmental Setting	Section II.C.4, page II-70	An additional reference is Howell, C. A. and W.D. Shuford 2008. Conservation Blueprint for Birds in the Imperial Valley. Report to Audubon California.
5/31/2011	Pacific Coast and Central Valley Group, Chrissy Howell	2, Environmental Setting	Section II.C.4, page II-70	For the Shuford et al. 2000 reference to a report, they should also look at the Studies in Avian Biology monograph produced by Shuford in 2004 (that resulted from the 2000 report).
5/31/2011	Pacific Coast and Central Valley Group, Chrissy Howell	2, Environmental Setting	Section II.C.4, page II-70	Maybe I missed it, but where are "desert wash" habitat and species covered? More meta-data are needed for this map. What source was used if there were multiple sources of information in a given area? Why didn't they use a standard/existing landcover map – especially for the sources bulleted in the middle of page II-88? Or is that what they did, but then updated it?
5/31/2011	Pacific Coast and Central Valley Group, Chrissy Howell	2, Environmental Setting	Section II.D.1, page II-90	For Figure II-7: did this all come from one source or from the composite? Are the "unspecified lands" the same as privately owned? For rural/urban they may want to look at the Upland data layer available from Jim Thorne at UC Davis.
5/31/2011	Pacific Coast and Central Valley Group, Chrissy Howell	2, Environmental Setting	Section II.D.3, pages II-100 and II-103 (figure II-9)	Figure II-9 and related text: explanation should be given for why they didn't use existing classification of Type 1-4 from existing data sources (national GAP). Also the introduction does not mention Type 4, but Table II-11 does. More background information on the national system used to determine Types 1-4 would be useful. I generally think a key attribute of Type 3 lands is that they permit "extraction" (logging/mining); the type classification by the national GAP program should be double-checked on this point. Also additional information on why they chose to classify some lands differently than the national Gap program. Putting all military reservations as Type 3 should be better justified (or revisited—some of these lands are not protected). I think it is important to do an analysis on how lands were classified using this system versus by the national GAP program (e.g. I think National GAP considers all military lands as Type 4, but I'm not sure) and then a justification/explanation of the choices. In listening to the Webex presentation on the land cover map, I got the impression that a lot of thought and effort had gone in to creating this product, but those extra details do not come through in the text.

DRAFT - October 26, 2011  
**Appendix E**  
**Stakeholder Comment Matrix**

<b>Framework Conservation Strategy Report Comment Matrix</b>				
Comment Date	Commenter	Location/Chapter	Section, Subsection, Paragraph, Sentence	Comment or Issue
5/31/2011	Pacific Coast and Central Valley Group, Chrissy Howell	3, Conservation Planning Process	Section III.A, page III-1	What is the systematic approach that is being used? Please elaborate, especially in relation to more recent literature on the topic.
5/31/2011	Pacific Coast and Central Valley Group, Chrissy Howell	3, Conservation Planning Process	Section III.A, page III-3, bulleted list	How does this list compare with the conservation reserve selection approaches touted by the folks cited on the bottom of page III-1? especially Moilanen?
5/31/2011	Pacific Coast and Central Valley Group, Chrissy Howell	3, Conservation Planning Process	Section III.B, page III-6	More background on GAP analysis would be helpful (and a couple of citations). How well to the descriptions of Types 1-4 match with the preceding chapter (I think there are some differences)? Also note that some species/habitats could look okay in terms of the percent area covered from the GAP analysis, but if the areas come from multiple highly fragmented areas, then that could be a problem for some species. A metric of fragmentation could even be given for these different land types if area-sensitivity is an issue with some habitats/species.
5/31/2011	Pacific Coast and Central Valley Group, Chrissy Howell	3, Conservation Planning Process	Section III.C.2, Tables III-8 and III-9	It might be worthwhile to add a column showing the ratio of protected (types 1-3) and unprotected (type 4)
4/27/2011	Southern California Edison, Roger Overstreet	2, Environmental Setting	Section V.B.9.a	Exclusion areas must take into consideration the need for transmission lines and associated linear facilities (such as distribution and telecommunication lines) to cross larger landscape areas that may potentially include exclusion areas, since linear facilities by their nature are not confined to a specific locality or area. Designated utility corridors for linear facilities should be considered as an option.
4/27/2011	Southern California Edison, Roger Overstreet	5, Description of Covered Activities	Table V-1	Box should be checked - Manned substations may require sewage facilities.
4/27/2011	Southern California Edison, Roger Overstreet	5, Description of Covered Activities	Table V-1	Box should be checked - Manned substations may require a water source.
4/27/2011	Southern California Edison, Roger Overstreet	5, Description of Covered Activities	Table V-1	Description of transmission line upgrades (rebuilt) needs to include the demolition/removal of existing transmission lines to construct a new line.
4/27/2011	Southern California Edison, Roger Overstreet	5, Description of Covered Activities	Table V-1	Box should be checked - Manned substations could potentially use wells as a water source.
4/27/2011	Southern California Edison, Roger Overstreet	5, Description of Covered Activities	Table V-1	Suggest adding helicopter work to the covered activities table due to the particular environmental concerns associated with these activities. For transmission facilities this would include construction and operations and maintenance activities. Also, use of helicopters for transmission line construction may be required to avoid impacts associated with access roads or to avoid sensitive areas.
4/27/2011	Southern California Edison, Roger Overstreet	5, Description of Covered Activities	V.C.1.a. Transmission Lines	In addition to access roads, transmission construction requires the use of areas outside of the right-of-way for staging/storage/marshalling yards, work areas for conductor pulling, splicing, and tensioning, and potentially for other project related activities.
4/27/2011	Southern California Edison, Roger Overstreet	5, Description of Covered Activities	Section V.C.5 Temporary and Permanent Appurtenant Facilities	Suggest adding "Electrical distribution line and facilities" to the listed utilities.
4/27/2011	Southern California Edison, Roger Overstreet	5, Description of Covered Activities	Section V.D.1 Initial Pre-Construction Activities	Suggest adding "Surveys and staking of facility locations, access routes, and work areas".

DRAFT - October 26, 2011  
**Appendix E**  
**Stakeholder Comment Matrix**

<b>Preliminary Conservation Strategy Prep Comment Matrix</b>						
<b>Comment Date</b>	<b>Commenter Group</b>	<b>Commenter</b>	<b>Subject Area</b>	<b>Location/Chapter</b>	<b>Section, Subsection, Paragraph, Sentence</b>	<b>Comment or Issue</b>
6/17/2011	Stakeholder	RMWG, Jeff Aardahl	Subareas Memo		E-mail, paragraph 2	Consider using the "ecosystems" map from the 1980 CDCA Plan.
6/27/2011	Stakeholder	PRBO/Christine A. Howell, PhD	Species Modeling Memo		Page 1, paragraph 1	Below are my comments on the memorandum. In summary, I strongly suggest that the contractor use statistically-based modeling methods as the first step in creating distribution models; this was also the recommendation of the Independent Science Advisory Panel to the DRECP. Statistically-based models are widely used and accepted by academic and applied conservation scientists; they are highly transparent and allow for model evaluation and validation (as opposed to expert-based models). If statistical models perform poorly based on model evaluation diagnostics, then expert opinion models could be used as a follow-up effort. Overall statistical modeling will be more robust, accurate, transparent, and defensible than an expert opinion model. In my experience statistical models using algorithms such as Maxent can be developed, run, and evaluated for model performance within one week for a species. If the contractor is encountering difficulties with statically-based model methods because of lack of technical expertise, then they should obtain assistance from those more knowledgeable with those methods. Lack of technical expertise should not be used as rationale to ignore important conservation tools such as statistically-based models. Finally, spatial resolution is not addressed in the memo, but care should be given to selecting the appropriate spatial scale for the proposed modeling exercises.
6/27/2011	Stakeholder	PRBO/Christine A. Howell, PhD	Species Modeling Memo		Page 1 (third paragraph) through page 2 (first paragraph)	Comment 1: Regarding the sentence on page 2 of the memo which states: "We considered the development of statistically-based models for the DRECP but rejected this approach for several reasons including technical difficulties, existing data limitations, and lack of transparency." Issue of technical difficulties: The memo does not elaborate on the technical difficulties encountered, but numerous ecological studies have successfully applied statistically-based model algorithms (Elith et al. 2006, Elith et al. 2011) including algorithms appropriate for situations where there are only records of a species' presence ("presence-only" algorithms), as well as algorithms that are appropriate for situations where there are both species' presence and absence records ("presence-absence" algorithms). Maxent is an algorithm that works with presence-only data and has been highly competitive when Page 2 of 6 compared to other presence-only or presence-absence algorithms (see Elith et al. 2006 for an extensive comparison of algorithms). As described in Elith et al. 2011 (p. 44): "MaxEnt's predictive performance is consistently competitive with the highest performing methods (Elith et al., 2006). Since becoming available in 2004, it has been utilized extensively for modelling species distributions. Published examples cover diverse aims (finding correlates of species occurrences, mapping current distributions, and predicting to new times and places) across many ecological, evolutionary, conservation and biosecurity applications (Table 1). Government and nongovernment organizations have also adopted MaxEnt for large-scale, real-world biodiversity mapping applications, including the Point Reyes Bird Observatory online application ( <a href="http://www.prbo.org/">http://www.prbo.org/</a> ) and the Atlas of Living Australia ( <a href="http://www.ala.org.au/">http://www.ala.org.au/</a> )."
6/27/2011	Stakeholder	PRBO/Christine A. Howell, PhD	Species Modeling Memo		Page 2, paragraph 2 through 5	of expertise with statistically-based modeling methods then they should obtain assistance from those more knowledgeable in these methods. Lack of expertise should not be used as rationale to not use important conservation tools such as statistically-based models. In fact the DRECP ISA (2010) states (pg 54, bold emphasis added here): "Species distribution (or occupancy) modeling is a very active and constantly evolving research field with numerous recent advances (Elith et al. 2006, Elith and Leathwick 2009; <a href="http://biodiversityinformatics.amnh.org/index.php?section=sdm_guide">http://biodiversityinformatics.amnh.org/index.php?section=sdm_guide</a> ). SDMs use environmental variables characterizing places where a species does (or does not) occur based on survey data to develop sophisticated correlative models. SDMs may also be extrapolated to project future occurrences in places where the correlated environmental features are projected to be present in the future (Wiens et al. 2009). Care should be taken to select a modeling approach and SDM algorithm that performs well based on recent peer-reviewed literature and which is appropriate for the organism being modeled. It may be prudent to model the data with more than one SDM algorithm and examine overlap among model outputs ("consensus modeling"), as well as the amount of uncertainty among model outputs (see Wiens 2009 for an example of uncertainty analysis). We emphasize the importance of expertise and rigor in applying these highly technical models. In our collective experience, this expertise is generally lacking at environmental consulting firms that prepare HCPs, NCCPs, and NEPA and CEQA documents. However, there is a growing pool of appropriate expertise at academic research institutions, science-based NGOs, and science-based government agencies, such as USGS. We urge DRECP to tap appropriate expertise for the application of any scientific models, because learning while-doing is inefficient and error-ridden." Conclusion: There is not adequate justification to list "technical

DRAFT - October 26, 2011  
**Appendix E**  
**Stakeholder Comment Matrix**

Preliminary Conservation Strategy Prep Comment Matrix						
Comment Date	Commenter Group	Commenter	Subject Area	Location/Chapter	Section, Subsection, Paragraph, Sentence	Comment or Issue
6/27/2011	Stakeholder	PRBO/Christine A. Howell, PhD	Species Modeling Memo		Page 2, paragraph 6, through page 3, paragraph 2	<p>Issue of existing data limitations: The memo cites a study by Wisz et al. 2008; this study evaluates predictions from 12 algorithms for 46 species (from six different regions of the world) at three sample sizes (100, 30, and 10 records). In the abstract of the paper Wisz et al. state (p. 763, bold emphasis added here):</p> <p>"Other algorithms were much less sensitive to sample size, including an algorithm based on maximum entropy (MAXENT) that had among the best predictive power across all sample sizes. Relative to other algorithms, a distance metric algorithm (DOMAIN) and a genetic algorithm (OM-GARP) had intermediate performance at the largest sample size and among the best performance at the lowest sample size. No algorithm predicted consistently well with small sample size (n&lt; 30) and this should encourage highly conservative use of predictions based on small sample size and restrict their use to exploratory modelling."</p> <p>Page 3 of 6</p> <p>Based on the Wisz et al. study, Maxent is an appropriate algorithm when there are 30 or more records. Wisz et al. (p 771) also note the potential for exploring data using Maxent with sample sizes less than 30:</p> <p>"We have shown that no modeling approach tested was fully robust to small sample sizes, but that for exploratory modelling with sample sizes between 10 and 30 records, MAXENT, OM-GARP, and possibly DOMAIN may be the best available."</p>
6/27/2011	Stakeholder	PRBO/Christine A. Howell, PhD	Species Modeling Memo		Page 3, paragraph 3 through paragraph 4	<p>It should also be noted that data limitations also apply to expert opinion models. For example, if there is limited or spatially biased sampling for a species, the fact that the majority of known localities may be in a particular vegetation or soil type could potentially bias the expert's opinion just as it would the statistical model. However, statistical modeling also allows one to conduct sensitivity analyses in order to determine how potential bias might be affecting the model output. Overall statistical modeling will be more robust, accurate, transparent, and defensible than an expert opinion model.</p> <p>Conclusion: "While various studies have shown that statistical models are more robust with larger sample sizes, a sample size of 30 is robust for modeling data with at least one algorithm (Maxent). Exploratory analyses are also possible with smaller data sets. If 30 records are available then statistically-based models should be constructed and model performance should be evaluated. Non-statistical modeling methods should be considered for sample sizes less than 30 and when statistical models created with 30 or more records have demonstrated poor model performance after undergoing model validation diagnostics. The consultants should determine what the sample sizes are for each of the taxa of interest and then consult with species experts to determine if there are additional data sources. There are numerous potential sources of species occurrence data beyond the CNDSB (many of these are listed in the DRECP ISA 2010) including eBird.</p>
6/27/2011	Stakeholder	PRBO/Christine A. Howell, PhD	Species Modeling Memo		Page 3, paragraph 5 through paragraph 6	<p>Issue of lack of transparency: It is not clear how the use of statistical algorithms is not transparent. In fact the bottom of page one of the memo states that "Species distribution modeling can provide an objective, transparent, and repeatable means of assessing species habitat distribution where the species distribution or distribution of suitable habitat for a species is not well known." Moreover, species distribution models have a range of validation and evaluation diagnostics that allow the user to better understand the results and the validity of the model outputs. These tools allow the user to determine how much of the variance is explained by the model, as well as which variables are most important in the model, thus providing greater transparency. These diagnostics also allow the user to assess the uncertainty associated with the model because the outputs are created in terms of a probability of occurrence (ranging from zero to one). These probability of occurrence surfaces may reflect the dynamic nature of a species' range and can be used to prioritize future conservation actions or survey efforts. Expert-opinion models do not provide a means to evaluate model performance or model uncertainty. Conclusion: It is not justifiable to list "lack of transparency" as a reason not to use statistically-based methods.</p>
6/27/2011	Stakeholder	PRBO/Christine A. Howell, PhD	Species Modeling Memo		Page 4, paragraph 1 through paragraph 3	<p>Comment 2: Regarding sentence on page 3 of the memo that states: "As described by Elith and Leathwick (2009), "modelers are still coming to terms with how best to model presence-only data." [italics added]</p> <p>Issues with presence only modeling: The phrase italicized above gives the impression that presence-only model methods are inadequate. However in the context of the entire paragraph of their paper, Elith and Leathwick (2009) are highlighting the range of views by researchers of presence-only modeling approaches and they conclude by indicating the need for further progress in the field. In a paper published two years later (Elith et al. 2011) provide additional details (p. 43) on the progress of presence only modeling as well as details on implementing Maxent. The paper is:</p> <p>"...written for ecologists and describes the MaxEnt model from a statistical perspective, making explicit links between the structure of the model, decisions required in producing a modelled distribution, and knowledge about the species and the data that might affect those decisions."</p> <p>Conclusion: Presence only algorithms can provide robust model results if judiciously applied.</p>
6/27/2011	Stakeholder	PRBO/Christine A. Howell, PhD	Species Modeling Memo		Page 4, paragraph 4	<p>Comment 3: Regarding the last sentence on page 3 of the memo which states: "Additionally, the spatial bias inherent in the occurrence data can result in skewed modeling results with statistically-based models."</p> <p>Issue of spatial bias: Elith et al. 2011 (p. 43) describes methods for dealing with biased species data using the Maxent algorithm: "Appropriate treatments for survey bias, unprojected data, locally restricted species, and predicting to environments outside the range of the training data are demonstrated, and new capabilities discussed." Additional papers on Maxent available from Steven Phillips' (one of the Maxent developers) website <a href="http://www2.research.att.com/~phillips/density.php">http://www2.research.att.com/~phillips/density.php</a> provide guidance on handling data bias.</p> <p>Conclusion: There are methods to handle biased data. The contractor should first determine what species occurrence data are available, what the biases are for existing data (perhaps in concert with species experts), and what steps are needed to correct those biases; corrective steps should then be implemented. As noted in Comment #1, biased data will also be a problem for expert-based models.</p>

DRAFT - October 26, 2011  
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<b>Comment Date</b>	<b>Commenter Group</b>	<b>Commenter</b>	<b>Subject Area</b>	<b>Location/Chapter</b>	<b>Section, Subsection, Paragraph, Sentence</b>	<b>Comment or Issue</b>
6/27/2011	Stakeholder	PRBO/Christine A. Howell, PhD	Species Modeling Memo		Page 4, last paragraph	Comment 4: Regarding paragraph 2 on page 4 which states: "In addition to the limitations noted above, the technical complexities and rigorous nature of developing ground-up, DRECP-specific statistically-based models were not considered compatible with the scope and schedule of the DRECP Preliminary Conservation Strategy. By way of example, the statistically-based species distribution model for the desert tortoise developed by the US Geological Survey (Nussear et al. 2009) utilized 15,311 data points and involved an extensive amount of species presence data standardization, environmental variable resampling, and model tuning. A similar model is being developed for the Mohave ground squirrel, which when completed will have taken about 18 months to develop."
6/27/2011	Stakeholder	PRBO/Christine A. Howell, PhD	Species Modeling Memo		Page 1, paragraph 1	Issue of technical complexity: Numerous ecological studies have successfully applied statistically-based model algorithms (Elith et al. 2006, Elith et al. 2011) including algorithms appropriate for situations where there are only records of a species' presence ("presence-only" algorithms), as well as algorithms that are appropriate for situations where there are both presence and absence records ("presence-absence" algorithms) for a species. Both statistical and expert opinion models require environmental data (e.g. appropriate GIS layers) and a clean or standardized set of species occurrence data indicating where the species has occurred. Once species occurrence and environmental data are available then it should not take one technician longer than one week to create model output for one species. Additional refinement may be necessary but that will be required regardless of the chosen modeling method. Also, while Nussear et al. (2009) produced a robust model with a dataset of 15,311 data points (which was later resampled to 6,350 grid-cell points), a smaller number of data points can be used to produce a robust model (see Comment #1 regarding sample size).
6/27/2011	Stakeholder	PRBO/Christine A. Howell, PhD	Species Modeling Memo		Page 5, paragraph 2 through paragraph 3	If the contractor is encountering technical difficulties because of lack of technical expertise with statistically-based modeling methods then they should obtain assistance from those more knowledgeable with those methods. Lack of technical expertise should not be used as rationale to not use important conservation tools such as statistically-based models (See Comment #1). Conclusion: Statistically-based modeling methods are frequently used by ecologists and conservation practitioners in order to reach scientifically defensible conclusions. These methods were considered preferable to expert based models by the DRECP ISA (2010) and these approaches have been used successfully by other scientists working within the DRECP boundaries (i.e. Nussear et al. 2009). If the contractor finds these approaches to be overly complex, then the contractor should seek out the expertise and assistance of those more knowledgeable in this field. The contractor has not provided any evidence that they have even attempted to apply statistically-based modeling methods.
6/27/2011	Stakeholder	PRBO/Christine A. Howell, PhD	Species Modeling Memo		Page 6	Literature Cited DRECP Independent Science Advisors (DRECP ISA). 2010. Recommendations of Independent Science Advisors for The California Desert Renewable Energy Conservation Plan (DRECP). Prepared for the Renewable Energy Action Team. Elith, J., Phillips, S., Hastie, T., Dudik, M., Chee, Y., Yates, C. 2011 A statistical explanation of MaxEnt for ecologists. Diversity and Distributions 17: 43-57. Elith, J., J.R. Leathwick. 2009. Species Distribution Models: Ecological Explanation and Prediction Across Space and Time Annu. Rev. Ecol. Evol. Syst. 2009. 40:677-97 Elith, J., C.H. Graham, R.P. Anderson, M. Dudik, S. Ferrier, A. Guisan, R.J. Hijmans, F. Huettmann, J.R. Leathwick, A. Lehmann, J. Li, L.G. Lohmann, B.A. Loiselle, G. Manion, C. Moritz, M. Nakamura, Y. Nakazawa, J. McC. M. Overton, A.T. Peterson, S.J. Phillips, K. Richardson, R. Scachetti-Pereira, R.E. Schapire, J. Soberón, S. Williams, M.S. Wisz, and N.E. Zimmermann. 2006. Novel methods improve prediction of species' distributions from occurrence data. Ecography 29:129-151. Nussear, K.E., T.C. Esque, R.D. Inman, L. Gass, K.A. Thomas, C.S.A. Wallace, J.B. Blainey, D.M. Miller, and R.H. Webb. 2009. Modeling habitat of the desert tortoise (Gopherus agassizii) in the Mojave and parts of the Sonoran Deserts of California, Nevada, Utah, and Arizona: U.S. Geological Survey Open-File Report 2009-1102, 18 p. Wisz, M.S., R.J. Hijmans, J. Li, A.T. Peterson, C.H. Graham, A. Guisan, and NCEAS Predicting Species Distributions Working Group. 2008. Effects of sample size on the performance of species models. Diversity and Distributions. 14: 763-773.
6/27/2011	Stakeholder	CBD/Ileene Anderson	Species Modeling Memo		Page 1, paragraph 1	Thank you for the opportunity to submit comments on the modeling approach. We believe that the proposed approach is not consistent with the recommendations of the Independent Science Advisors (ISA) and will not achieve the stated goals of the DRECP. Our specific comments are noted below:
6/27/2011	Stakeholder	CBD/Ileene Anderson	Species Modeling Memo		Page 1, paragraph 2	The ISA clearly recommend that statistical (empirical) modeling be implemented. The benefits of this approach are particularly appropriate for the DRECP because it will be dealing with species on the move as climate change continues and statistical modeling enables projections of "future occurrences in places where the correlated environmental features are projected to be present in the future." (ISA at 54). The ISA also recommends that "consensus modeling" be applied where more than one statistical species distribution model is applied to the data and the subsequent areas of overlap evaluated. In addition they recommend that the uncertainty be evaluated.
6/27/2011	Stakeholder	CBD/Ileene Anderson	Species Modeling Memo		Page 1, paragraph 3	The memo states that statistical modeling was rejected because of "technical difficulties, existing data limitations, and lack of transparency". It is unclear what the technical difficulties are although the ISA also anticipated that the necessary "expertise is generally lacking at environmental consulting firms that prepare HCPs, NCCPs, and NEPA and CEQA documents" for statistical modeling. It urges the DRECP to "tap appropriate expertise for the application of any scientific models, because learning-while-doing is inefficient and error-ridden." [Emphasis original] (ISA at 54). While we agree that data for some species may preclude the use of statistical modeling, for numerous species being considered as covered species, there are adequate data sets (more than 30 data points) available to implement a statistical model.

DRAFT - October 26, 2011  
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6/27/2011	Stakeholder	CBD/Ileene Anderson	Species Modeling Memo		Page 1, paragraph 4	Furthermore the ISA recommends "cautious use" of expert-opinion models only when there are inadequate data points or an underlying bias (ISA at 55). The memo seems to suggest that expert-opinion models will be the primary modeling tool, which is at odds with the ISA recommendations. While the Memo identifies that climate change modeling is not apart of this memo, but we urge the DRECP to focus on this important issue in the subsequent modeling efforts because the success of the plan will depend on it. While we recognize that the modeling science is imperfect to date, we strongly request that the ISA recommendations of Section 3.5 (ISA at 59-60) be incorporated into the modeling effort. This important "glimpse at the future" is key to the success of the DRECP.
6/27/2011	Stakeholder	CBD/Ileene Anderson	Species Modeling Memo		Page 2, paragraph 2 through paragraph 4	As demonstrated in the mapping subgroup meeting, the Land Cover data which is presented on the Land Cover map, is inaccurate. Using these data as a basis for the modeling upon which conservation and development scenarios are based will result in flawed outputs, likely dooming the DRECP goals for conservation. The modeling output should be used for decision-making purposes only after the updated vegetation mapping has been integrated and refined. Lastly while the models are being developed, modeling experts need to be retained to develop and apply the most appropriate and cutting edge models, including those on the ISA. We also urge that the output from the models be reviewed not only by the REAT and the "Science Expert", but that numerous experts for each species and/or the ecological niche (ex. eolian processes) are retained for the review. Feel free to contact me with any questions.