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General Comments on Public Review Draft of DRECP Independent Science Advisory  
Report August 2010

Todd Keeler-Wolf  
September 10, 2010

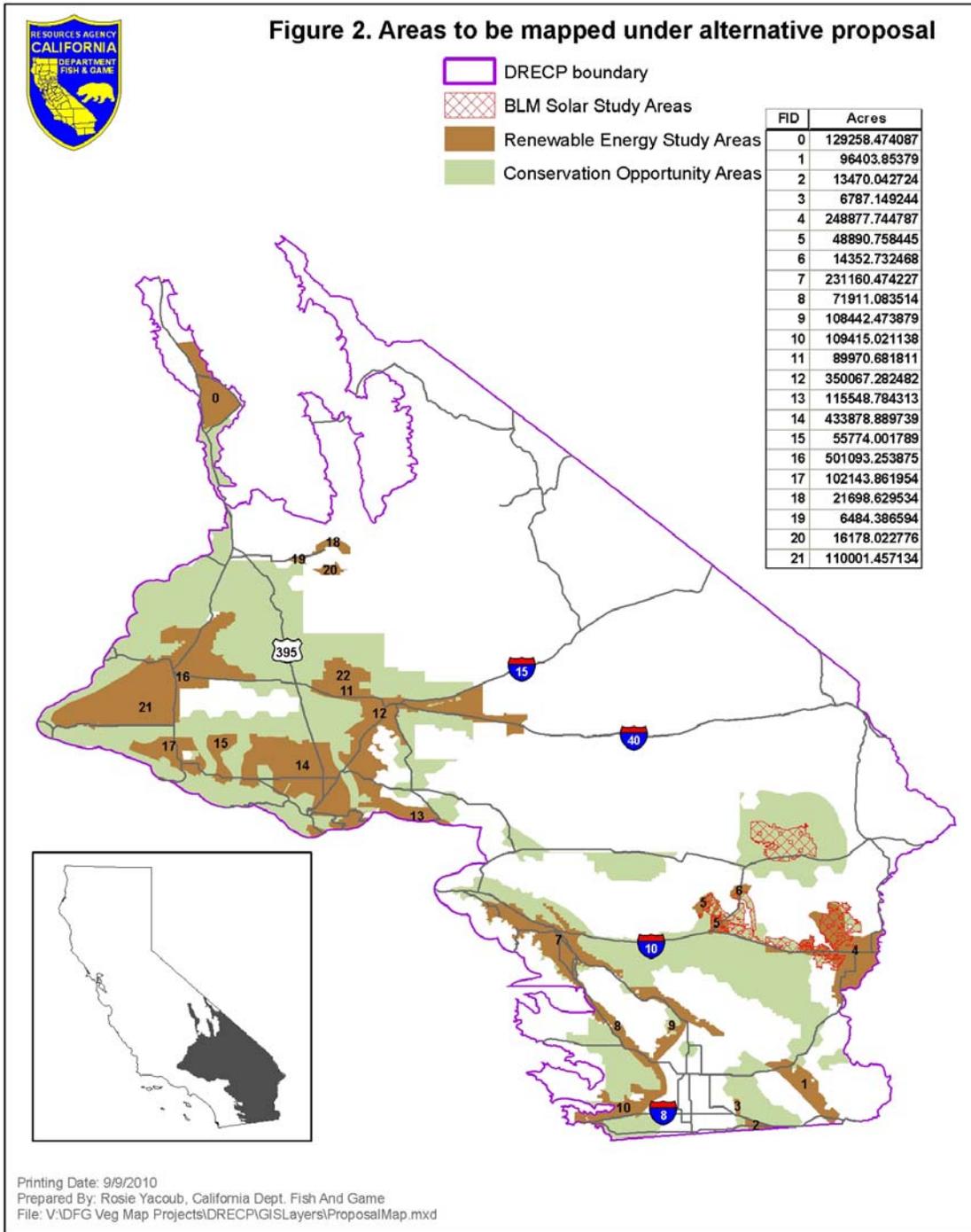
Generally this is a very good summary of the issues and is well crafted and detailed, especially given the short time frame for producing it. The panel should be commended on its efforts.

My comments will focus on Vegetation and related topics.

I was extremely pleased to see the report take such a firm stance on the importance of vegetation in making sound decisions for the planning process. This is one of the first large NCCP/HCP projects that have decisively confronted the importance of vegetation and admits the paucity of good existing vegetation data which can drive the planning process. I was heartened by many of the comments about vegetation and felt validated since many of my thoughts I had shared with panel members have been articulately voiced in the document.

The comments on page 6 of the document “we recommend creating an “interim” or mid-level vegetation map by compiling new and existing vegetation maps, reformatting to allow for standardized representation at a mid-level hierarchy (e.g., using vegetation alliances or alliance groups), and edge-matching appropriately with adjoining states and Mexico.” And the more detailed comments on pages 47 and 48 need to be further elaborated upon, since the limited time and contractual constraints are unlikely to enable even this interim product to be produced in time (e.g., February 2012).

What do we do if there is not even enough time to develop a seamless map that merges existing data with new data? I think it depends upon the process of decision making involved at the outset of the review of the draft plan. Assuming that there is a review process that lasts until June 30 2012 before the first concrete planning steps are taken, and assuming that there is no more alteration of core planning zones (the renewable energy study areas and surrounding conservation opportunity areas, see inserted figure on next page)



this would require over 7 million acres to be mapped in about 11 or 12 months (assuming minimum lag time between initiation of request and seating of appropriate consortium of contractors and agencies working on the map). This does not even allow for any time to merge the existing mapping mentioned in the report with this new mapping proposed to answer questions about previously un mapped parts as shown in the figure above.

If we can assume that funding is ready and appropriate to do the new areas and get them done before February 2012, can we allow for the merger and seaming of existing data and new data by June 2012 when actions need to be taken? I certainly hope so. One thing to expedite this would be to have separate contracts for one group to prepare the existing information and standardize it as much as possible with the new data being developed so that the data seaming process can take relatively little time. We would still have to wait until the new mapping was done before the edge-matching and full standardization of the data sets, but much of the hard work in a good merger of existing multi-resolution vegetation data with new data lies in the proper reformatting and aggregation and translation and proper topologic modifications, which could all take place simultaneously with the making of the new map.

I am hoping something like this could be done close to (if not exactly coincident) with the February 2012 deadline. It might take an additional month of time and by March 2012 there would be a seamless planning area map for vegetation.

Another set of comments in the report underscores the importance of Natural Communities. Again, I strongly agree with this emphasis as a companion conservation strategy with vegetation mapping. Because many of these natural communities (or unique plant assemblages as an alternative term) are not mappable with the methodology used to produce the interim vegetation map, another method should be used to capture these entities. We might call this the special features layer. This term (I was happy to see) popped up 17 times in my search of the draft document. This special features map could be considered as a separate product that could be produced from existing information and compiled through research, interviews with local experts, and review of existing data stored in various forms within agency archives. I strongly recommend that there be an independent effort (contracting) to get this special features product completed in time for the initial planning assessment.

A correction on page 47: Re: the following comment:

“creating a comprehensive, alliance-level vegetation and special features map for the entire western Mojave region would take approximately 18 months once sufficient funding is provided to secure contract mapping, which would augment mapping that could be accomplished through CDFG’s Vegcamp efforts during the same time period (T. Keeler-Wolf, personal communications).”

Actually what I stated was that it would take 18 months to create a map that would cover the un-mapped area and cobble it together with a standardized compilation of existing maps from the 60% or so of the study area that has already been treated in multiple piecemeal efforts (e.g., the central Mojave vegetation project from Thomas et al 2004, plus the individual maps from Joshua Tree NP, Anza-Borrego, the Northern and Eastern Colorado Desert BLM Plan, etc.) It would take even longer to make an up to date map with an even classification and mapping resolution for the entire 24 plus million acres. This would certainly be advisable, but would probably cost upwards of \$15 million and might take 3-4 years to complete counting all the field data collection, map accuracy testing, and reporting that should go into such a product. Thus, the 18 months mentioned

was my estimate of doing the cobbling of old (mapping data from 1998 to 2007) and new data proposed for unmapped areas without the benefit of extensive field data collection and analysis of any new vegetation plots to validate and confirm a fine-scale vegetation classification throughout the new area.

As it stands now VegCAMP may have some money to do a portion of the new area (probably less than 1/3 of what is shown in the figure above). That would not even cover the core Renewable Energy Study Areas as mapped above. We need to get money very quickly (within a month) and contract with appropriate people within 2 months to have any hope of getting the area in the figure mapped prior to the Feb 2012 deadline.

I and my superiors would be happy to confer with anyone on the panel or any agency who can see a way to efficiently join efforts to get the interim map done within the allotted time frame.

My congratulations to you all for doing such a thorough and thoughtful scientifically credible review for this process.

Sincerely,



Todd Keeler-Wolf