



California Office  
1303 J Street, Suite 270 | Sacramento, CA 95814 | tel 916.313.5800 | fax 916.313.5812  
[www.defenders.org](http://www.defenders.org)

## DOCKET

09-RENEW EO-1

DATE APR 05 2012

RECD. APR 06 2012

April 5, 2012

David L. Harlow, Director  
Desert Renewable Energy Conservation Plan (DRECP)  
California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814-5512  
[DHarlow@energy.state.ca.us](mailto:DHarlow@energy.state.ca.us)

California Energy Commission  
Dockets Office, MS-4  
Docket No. 09-RENEW EO-01  
1516 Ninth Street  
Sacramento, CA 95814-5512  
[docket@energy.state.ca.us](mailto:docket@energy.state.ca.us)

Re: Comments on Draft Revised DRECP Biological Goals and Objectives

Dear Mr. Harlow:

Thank you for the opportunity to read and comment on the DRECP Draft Biological Goals and Objectives (BGOs) released March 21, 2012. We provided our initial feedback on this document verbally at the workshop held in Sacramento on March 28, 2012. This letter contains our general comments and recommendations for the next iteration of the BGOs for the DRECP. Due to the limited time available for submitting comments, we plan to submit more detailed comments on the BGOs on a line-by-line basis by April 13, 2012. These will be included directly in the document.

We strongly believe that the foundation of any conservation strategy begins with the delineation of clear and comprehensive goals and objectives with measurable outcomes. In conjunction with this letter, we are also submitting more detailed and specific comments as edits to the BGOs document.

Our general comments and recommendations are as follows:

- 1) The DRECP should adopt the recommendation from the DRECP Independent Science Advisors (ISA) that the plan's overarching goal be to: *“Contribute to the persistence, distribution, and diversity of the desert biota and all its natural components and processes today and into the future, while accommodating renewable energy development and adapting to climate change”*.<sup>1</sup>

---

<sup>1</sup> Spencer, W. D., et al. 2010. Recommendations of independent science advisors for the California Desert Renewable Energy Conservation Plan (DRECP). DRECP-1000-2010-008-F, Unpublished Report to the Renewable Energy Action Team.

National Headquarters

1130 17th Street, N.W.

Washington, D.C. 20036-4604

tel 202.682.9400 | fax 202.682.1331

- 2) The DRECP should clearly define the scope of the DRECP BGOs. The overarching goal, stated above, would necessitate that the plan address *all stressors* affecting species, natural communities and ecological processes covered by the plan, and not restrict the scope of the BGOs to stressors related only to renewable energy development. This needs to be clarified in the BGO document, as in some places, it appears that the BGOs address only renewable energy development-related stressors, whereas in other places stressors related to other human-related activities in the Planning area are addressed.
- 3) The DRECP should address BGOs for public and private lands separately. Most of the public lands within the planning area have clearly established conservation goals, objectives and management actions to preserve and recover sensitive species and their habitats or natural communities. We would like to echo the recommendation of the ISA that the “*DRECP implement and improve on scientifically sound conservation actions identified by existing conservation and recovery plans in the planning area.*”<sup>2</sup> Specifically, there are multiple agency management plans that have established biological standards, conservation areas, conservation actions and mitigation plans for habitats on public lands within the planning area e.g., see California Desert Conservation Area Plan, as amended; various management plans prepared by BLM for public lands designated as Habitat Management Plan areas, Areas of Critical Environmental Concern, or other special designations.

In contrast, most of the private lands are not covered by an effective conservation framework established by local jurisdictions. Within some regions of the planning area, however, large amounts of private land under the control or ownership of conservation organizations or land trusts who hold the lands for conservation purposes (e.g., Wildlands Conservancy, The Nature Conservancy, Mojave Desert Land Trust, Desert Tortoise Preserve Committee). For this reason, we recommend BGOs for public lands are treated separately from those for private lands. This will not only ensure that existing science-based conservation management plans for public lands are maintained or strengthened, but it will provide a secure foundation for the plan in the event it becomes a public land-only plan, as was the case with the West Mojave Plan.

- 4) The DRECP BGOs should explicitly address species needs under climate change scenarios. The DRECP planning agreement states that: “*The Parties intend that the DRECP and its conservation strategy will explicitly incorporate climate change adaptation research and establish climate change adaptation goals.*” One of the ways to ensure protections for species and communities in the planning area under future climate change scenarios is to ensure appropriate habitat

---

<sup>2</sup> Spencer, W. D., et al. 2010. Recommendations of independent science advisors for the California Desert Renewable Energy Conservation Plan (DRECP). DRECP-1000-2010-008-F, Unpublished Report to the Renewable Energy Action Team.

linkages exist throughout the plan area. The BGOs address the need for conservation of critical habitat linkages at the species, community and landscape level; however, we would like to stress two additional points in reference to climate change.

First of all, we recommend the DRECP create an objective specifically related to complete protection of water resources. In the desert region, water is the limiting resource for most of the species occurring there naturally. For this reason, riparian areas, wetlands, seeps and springs should be fully protected in the planning area. Linkages and corridors connecting water-dependent species to these critical resources must be fully protected to ensure that species continue to thrive under more variable and harsh climate projections into the future. This is somewhat captured in the objectives listed under Goal L1 (pp. 6-7); however, we would prefer to see an objective that specifically relates to complete protection of habitat linkages to/from critical water sources, including riparian areas throughout the planning area.

Secondly, we recommend the DRECP BGOs include an objective to conserve linkages within and extending beyond the planning area boundary. While the scope of this plan is limited to the planning area boundary, there are important linkages to natural communities outside of the plan area that affect the viability of species and natural communities within the plan area. Such linkages have been identified in various recent publications such as the California Essential Habitat Connectivity Project<sup>3</sup> and A Linkage Network for the California Deserts.<sup>4</sup>

- 5) The DRECP BGOs framework should minimize redundancy and repetition while clearly linking stressors, objectives and actions. We appreciate the effort DRECP has made to include hierarchical goals at the landscape, natural community and species level; however, this approach has created redundancy and repetition within the document. To reduce unnecessary redundancy we recommend listing each of the covered species in a table that includes columns identifying which species-specific BGOs will be sufficiently met at the Landscape and Natural Community levels through habitat-related actions. This will preclude the need to restate the same information at the species level. Furthermore, we believe the BGOs for individual species should only be those for which special management actions are needed for conservation because of their restricted range, highly specialized habitat requirements, or management actions that call for population manipulation (augmentation, translocation or reintroduction). We believe that for most covered species, their

---

<sup>3</sup> Spencer, W.D., P. Beier, K. Penrod, K. Winters, C. Paulman, H. Rustigian-Romsos, J. Strittholt, M. Parisi, and A. Pettler. 2010. California Essential Habitat Connectivity Project: A Strategy for Conserving a Connected California. Prepared for California Department of Transportation, California Department of Fish and Game, and Federal Highways Administration.

<sup>4</sup> Penrod, K., P. Beier, E. Garding, and C. Cabañero. 2012. A Linkage Network for the California Deserts. Produced for the Bureau of Land Management and The Wildlands Conservancy. Produced by Science and Collaboration for Connected Wildlands, Fair Oaks, CA [www.scwildlands.org](http://www.scwildlands.org) and Northern Arizona University, Flagstaff, Arizona <http://oak.ucc.nau.edu/pb1/>.

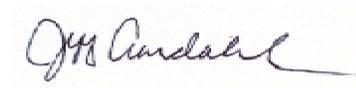
conservation needs can be sufficiently met through BGOs at the Landscape and Natural Community levels.

Additionally, we recommend providing stronger linkages between the threats and stressors listed in Table B-1 and the specific objectives that address those threats and stressors. The threats and stressors should be identified by specific location or sub-region within the planning area. This will allow for a clearer presentation and understanding how the objectives were formed, and where specific management actions will be needed. The goals and objectives, Table B-1 (Factors Critical to Species and Community Conservation), and stressor diagrams (Appendix C) are all excellent tools for use in crafting the BGOs for the DRECP, but as they stand now, it is unclear how they work together. We recommend providing a more explicit explanation of the connection between each of these elements.

- 6) We recommend the DRECP BGOs state the objectives in terms of percentage of habitat protected instead of a defined acreage of habitat. Due to existing uncertainties in the extent of species' habitats and acreages, we think that a percentage would better allow for appropriate protections of species. In this way, as more information and reliable data is incorporated into expert and suitability models, the necessary land protections can be adapted to the new information. To the extent that habitat acreages are needed to complete the plan, and allow for adaptive management and monitoring, we believe they can be established near the end of the planning process once natural community, specialized habitats and species ranges are refined and accurately mapped or modeled.

We appreciate the opportunity to review and comment on the BGOs document and we hope our comments and recommendations are useful as you work on finalizing this important component of the DRECP. Please contact either of us if you have questions or need clarification regarding our comments.

Sincerely,



Jeff Aardahl  
California Representative



Stephanie Dashiell  
California Desert Associate