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CALIFORNIA NATIVE PLANT SOCIETY

August 9, 2012

David Harlow, Director
Desert Renewable Energy Conservation Plan (DRECP)
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
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RE: CNPS additional comments on Desert Renewable Energy Conservation Plan (DRECP) Alternatives and new Vegetation Mapping database

Dear Director Harlow:

In addition to the general comments submitted jointly by NGO groups regarding the DRECP Alternatives 1-5, the California Native Plant Society submits additional comments regarding the use of the California Department of Fish and Game's (DFG's) Vegetation Mapping dataset (Map) to help refine the Development Focus Areas (DFAs) for the DRECP's Western Mojave area.

We understand that the Vegetation Map database was posted publicly via the DFG Bios ftp site on August 8th. Our comments below are therefore based on only an initial review of the information contained in the database, and our review and comments regarding the Map's relevance to the development of the DRECP will be on-going.

Vegetation polygons in the new Map can be plotted as National Vegetation Classification System (NVCS) Alliance level units. These fine-grained vegetation units are the same used by the CA DFG to assign rarity rankings on a scale of S1-S5 (where S1 is most imperiled) for plant communities, based on the State's Natural Heritage ranking criteria, which are consistent with national standards. In addition to finer-scale resolution of mapped vegetation units, information included in the database attributes qualifies the degree of land disturbance for mapped polygon units. Examples of disturbance attributes include; Roadedness, Development, Anthropogenic Alteration, Hydrologic Modification, Exotics. These and other attributes are defined in the associated report, *2012 Vegetation Map in Support of the Desert Renewable Energy Conservation Plan Interim Report (1.1)* (DFG VegCAMP and AIS, June 2012), and within the database's metadata file - both now available online. The Map has been field accuracy-assessed to a level (82.6%) that meets and exceeds recommended State standards (80%).

With this data it is now possible to generate more spatially accurate, finely-scaled disturbance and/or conservation values for mapped land units. For example, one can use the attribute-rich Vegetation Map data to identify which areas or parcels within a DFA contain plant communities of high conservation value (based on rarity, important habitat value, mitigation opportunity, or some combination of these), and which ones contain vegetation cover types that have been disturbed, and to what degree. Once SMART biological goals and objectives (BGO's) have been developed for species, communities, and ecological processes, the new Vegetation Map information can assist the prioritization of reserve design parcel selection, as well as inform DFA refinement and project micro-siting in order to avoid impacts to vegetation coverage and

terrestrial habitats needed to meet BGO targets.

In Figures 1 below, we illustrate where locally rare and important vegetation types occur relative to Alternative 1 DFAs in the newly mapped area. In Figures 2-3, we provide two examples of how the new map data can help address the issue of connectivity across the Antelope Valley while refining Alternative 1 and 2 DFAs in the newly mapped region of the Plan area. Information and vegetation categories displayed are taken directly from the Vegetation Map database's *Conservation* attribute, defined in the DFG report referenced above.

CNPS strongly urges the integration of the new Vegetation Map information into the development of the DRECP BGOs, Conservation Reserve design, and DFAs. As responsible stewards of our natural resources, and as a DRECP Stakeholder, we expect this information to be used effectively in this process as it represents best available science, and we are willing to assist in any way we can to ensure this happens.

Sincerely,

Greg Suba

Greg Suba
Conservation Program Director, CNPS

Figures 1-3

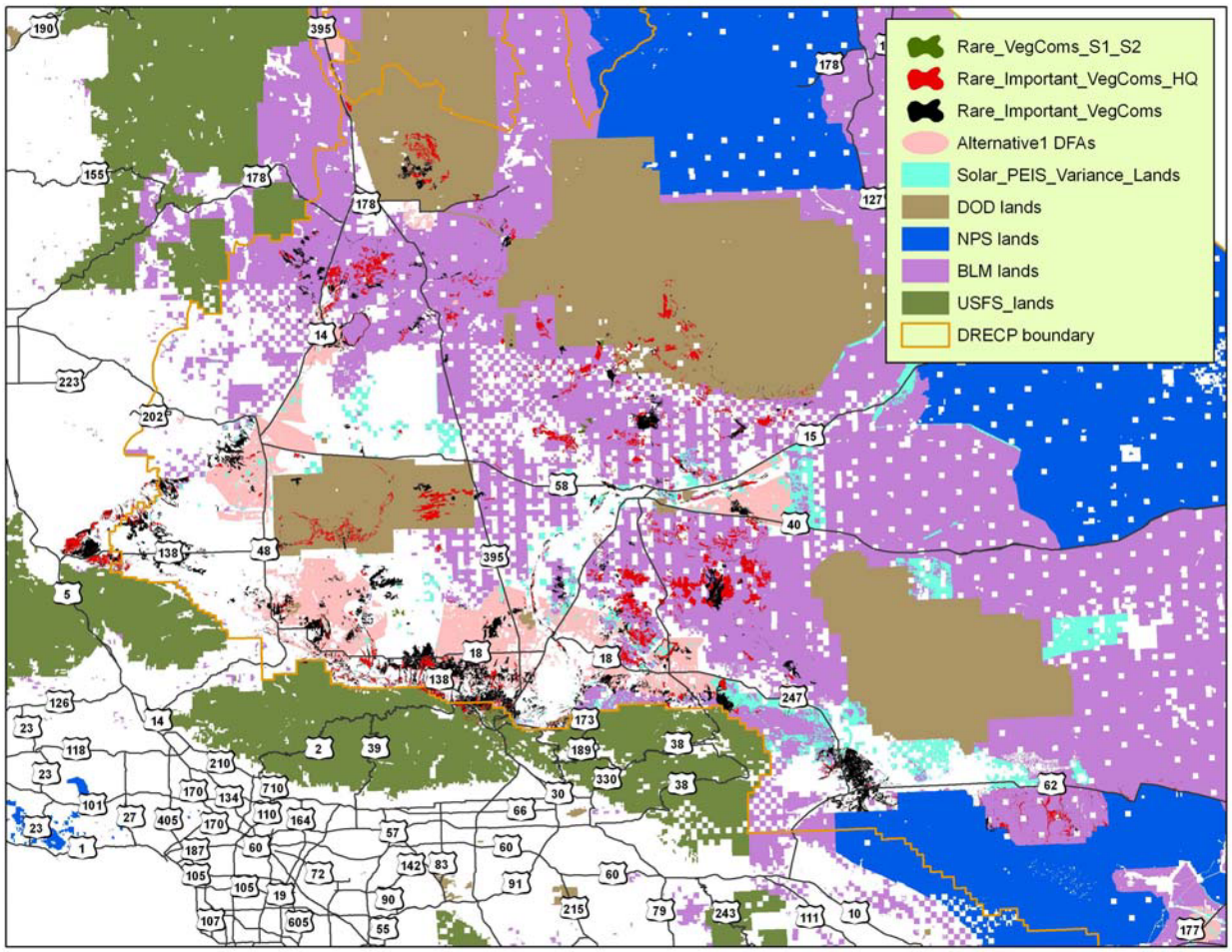

Figure 1. Rare and important vegetation types in relation to Alternative 1 DFAs in the Western Mojave region.

This image illustrates the extent of the mapped information for Locally Rare and Important Vegetation types, represented by the black (Locally rare and important vegetation communities), red (Locally rare and important vegetation communities - High Quality), and dark green polygons (Rare vegetation communities ranked S1 or S2). Much of the mapped information is resolved into polygons at the NVCS Alliance level.

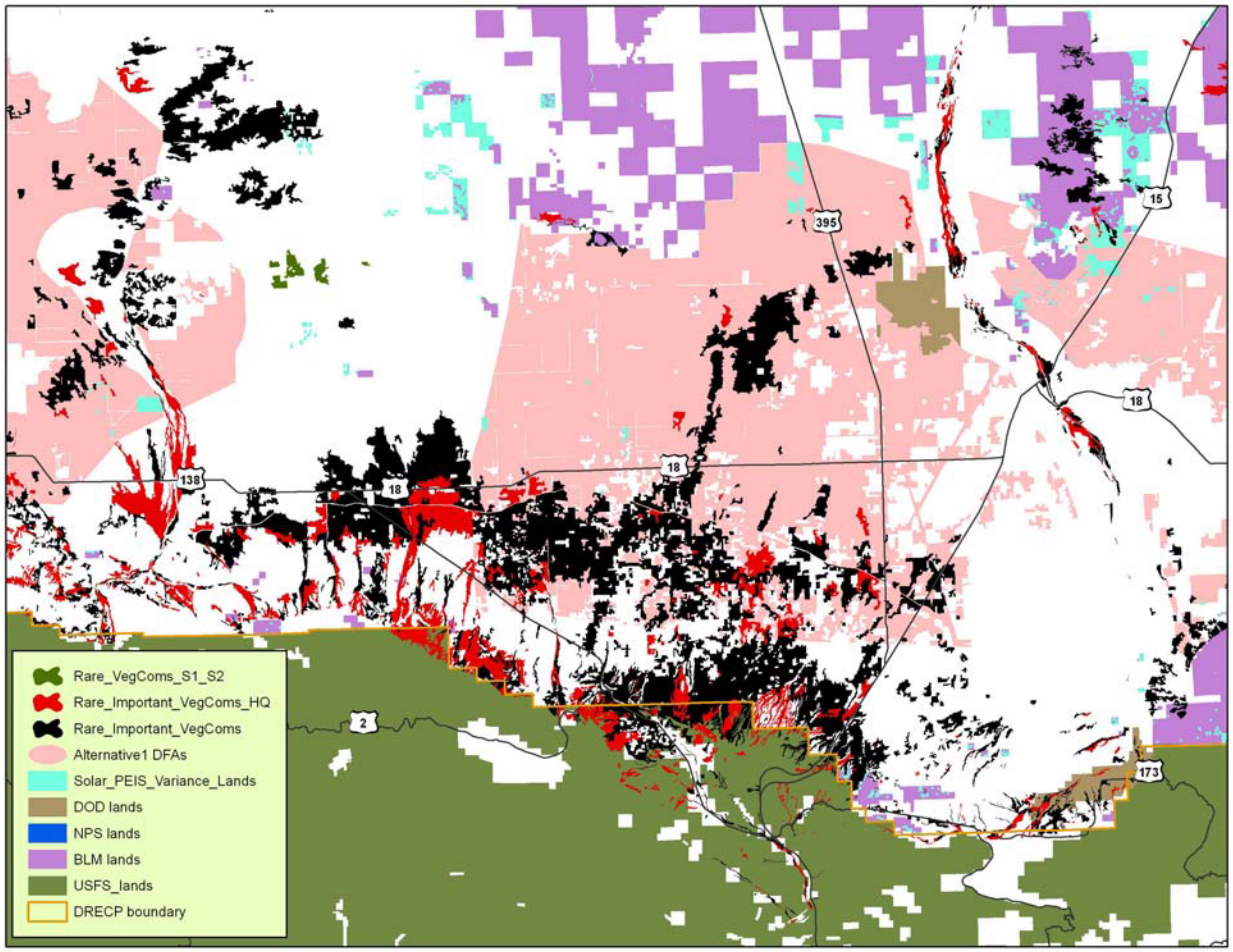

Figure 2. Example of where rare and important vegetation types occur relative to the Alternative 1 DFA located along the DRECP / Angeles and San Bernardino NF boundaries.

This is an example of one area in the West Mojave where the Alternative 1 DFA needs refinement. One of CNPS's major concerns with Alternative 1 and Alternative 2 DFAs is that they will not allow suitable north-south and east-west trending connectivity / dispersal corridors between the low-lying valley lands and the foothill / mountain regions to the north (Tehachapi / Southern Sierra Nevada ranges) and the south (San Bernardino / Angeles NF). These vegetation data can help identify where the DRECP should prioritize conservation areas for those corridors, and where project siting should be avoided.

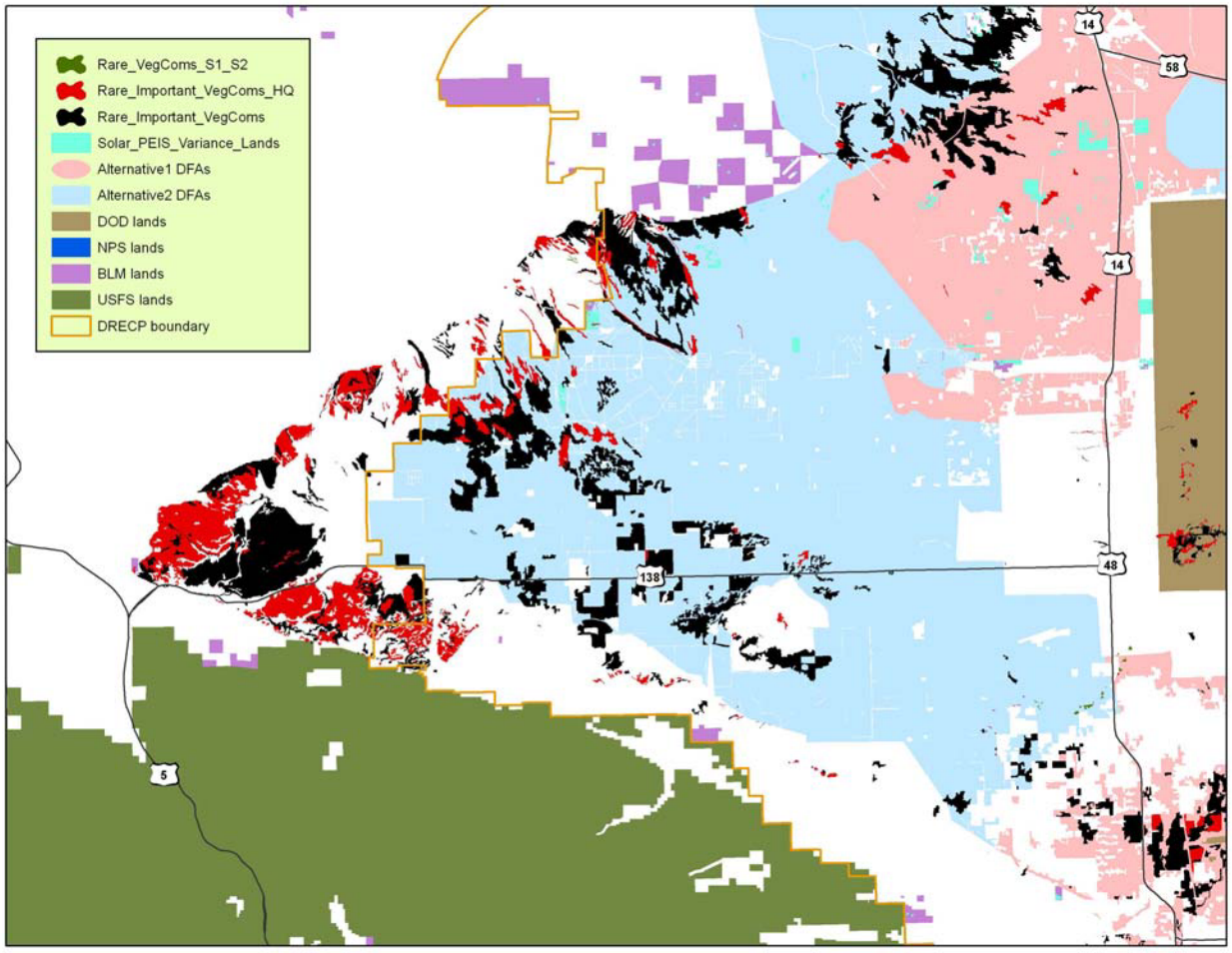

Figure 3. Examples of rare or important vegetation types occurring in Alternative 2 DFAs in the Western Mojave region.

This is a zoomed-in example of where an Alternative 2 DFA could be refined based on the new Vegetation Map data. The Alternative 2 DFA (light blue area) extending westward into Antelope Valley surrounds many acres of rare and important vegetation types, many of high conservation value (red). This DFA should be refined using the information available in the new Vegetation Map database.

The area immediately outside the westernmost "arrowhead" point of the DRECP boundary is shown to be the richly important vegetation area as previously described in comments by us and others. Biologically, it represents much potential compensatory mitigation land.

The larger black and red polygons in Figures 1-3 are themselves composed of smaller mapped units. Each map unit is identified by vegetation type, and includes several qualitative land cover attributes with the potential to refine and improve the Western Mojave DFAs in Alternatives 1 and 2.