California Energy Commission
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SODA MOUNTAIN SOLAR

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California Energy Commission
Dockets Office, MS-4
Docket No. 09-RENEW EO-01
1516 Ninth Street
Sacramento, CA 95814-5512
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SUBJECT: Comments on Description and Comparative Evaluation of Draft DRECP Alternatives

Dear Sir/Madam:

Soda Mountain Solar, LLC is providing comments on the "Description and Comparative Evaluation of Draft DRECP Alternatives" (California Energy Commission [CEC] 2012). The document will be referenced in this letter as the Alternatives Analysis. Soda Mountain Solar, LLC is the applicant for the Soda Mountain Solar project. The Soda Mountain Solar project (SMS project) is a 350 megawatt solar electric generating facility located in San Bernardino County. The project has requested a right-of-way (ROW) grant from the U.S. Bureau of Land Management (BLM). The BLM case number for the project is CACA 49584. Soda Mountain Solar, LLC is providing comments on components of the "Description and Comparative Evaluation of Draft DRECP Alternatives" as they pertain to the Soda Mountain Solar Project.

SUMMARY OF COMMENTS

Soda Mountain Solar comments are summarized into key points:

1. The SMS lands and Soda Mountain valley do not meet the criteria for NLCS designation
2. SMS project variance lands are inaccurately screened from Alternative 1
3. Desert tortoise and bighorn sheep model results are inconsistent with habitat and genetic studies

4. The bighorn sheep critical linkage designation for Soda Mountain Valley is inaccurate and unsupported
5. The High Biological Sensitivity designation is inaccurate and inappropriate for Soda Mountain Valley
6. The Soda Mountain Valley should be designated a Development Focus Area
7. Appendix E is overly restrictive and contemplates excessive mitigation requirements
8. Appendix I criteria for pending projects need further refinement
9. Extend the comment period for the Alternatives Analysis materials

SMS LANDS DO NOT MEET CRITERIA FOR NATIONAL LANDSCAPE CONSERVATION SYSTEM (NLCS) DESIGNATION

Purpose of NLCS

The NLCS designation was established to

> *"conserve, protect and restore nationally significant landscapes that have outstanding cultural, ecological, and scientific values for the benefit of current and future generations."*

Examples of lands within the NLCS include:

- Wilderness
- Wilderness Study Areas
- National Monuments
- National Conservation Areas
- Wild and Scenic Rivers
- National Scenic and Historic Trails.

Chapter 3.7 of the Description and Comparative Evaluation of Draft DRECP Alternatives states, "[u]nder the various plan alternatives, the DRECP will consider all lands within the CDCA boundary as identified in FLPMA for possible inclusion in the NLCS." Appendix D identifies the criteria that were applied to designate NLCS in the DRECP and how these lands were specified under each alternative.

Designation of Project Area in DRECP Alternatives

Alternatives 1 through 4 classify lands within the SMS project area and west of I-15 as NLCS. Alternative 5 classifies the entire SMS project area, both west and east of I-15, as NLCS. However, the SMS project area does <u>not</u> contain:

- Wilderness
- Wilderness Study Areas
- National Monuments

- National Conservation Areas
- Wild and Scenic Rivers
- National Scenic and Historic Trails
- Lands with Wilderness Characteristics

Most of the SMS project area is located within a designated utility corridor under Section 368 of the Energy Policy Act of 2005. The portion of the SMS project area northwest of the Interstate-15 Highway (I-15) is bounded by Blue Bell Mine Road, two transmission lines, mining areas, fuel pipelines, and fiber optic lines. The portion of the SMS project area southeast of I-15 is bounded by Rasor Road and a service station property, I-15, and the Rasor Off-Highway Vehicle (OHV) area. This portion of the project area is within close proximity to I-15, a four-lane divided highway and major transportation route between Los Angeles and Las Vegas. Highway I-15 experiences nearly continuous traffic. In short, the SMS project area's existing transportation and utility uses traversing the project area strongly suggest that the project area should not be included in the NLCS. Indeed, to do so would be entirely inconsistent with its current status as a Section 368 corridor under the Energy Policy Act of 2005.

The Soda Mountain Solar Site Does Not Have an Intact Landscape

The northwest portion of the SMS project area is identified as NLCS on Figures 2.3-1 and 2.3-4 of Chapter 2, Description of DRECP Alternatives. These figures present proposed land use categories for Alternative 1. Alternative 1 identifies NLCS lands in "highly scenic and intact landscapes".

The SMS project area includes an existing transmission corridor with multiple transmission lines, utilities, and the I-15 highway, which have altered the scenic landscape. The Visual Resource Inventory (VRI) index for the area is Class III as shown in Figure 3.4-4 of the document. Class III corresponds with moderate viewer sensitivity.

Appendix D states that Alternative 1 "excludes all existing transmission corridors" from areas identified as NLCS. The figure titled "Mojave and Silurian Valley Alt 1" in Appendix D does not include NLCS designated land in the northwest portion of the project area. It appears that Figure 2.3-1 and 2.3-4 incorrectly display SMS ROW lands northwest of I-15, which are within an existing Section 368 transmission corridor, as NLCS lands. This is most likely a GIS mapping error in Figures 2.3-1 and 2.3-4. The NLCS designations for Figures 2.3-1 and 2.3-4 in Chapter 2 should be revised to match the map in Appendix D. This area should not be designated as NLCS under Alternative 1 because it is in a transmission corridor, consistent with Appendix D.

The NLCS Designation is Not Appropriate for Transmission Corridors

The SMS project area northwest of I-15 is classified as NLCS in Alternatives 2 through 4. This designation corresponds with the presence of a Section 368 utility corridor within this area. As provided in Appendix D, NLCS identified in Alternatives 2 through 5 would include existing transmission corridors. The application of the NLCS designation to transmission corridors, particularly Section 368 corridors, is inconsistent with the purpose of the NLCS to

"…conserve, protect and restore nationally significant landscapes that have outstanding cultural, ecological, and scientific values for the benefit of current and future generations."

Transmission corridors are typically located in areas that are near highways and existing development. In the absence of critical habitat, significant cultural sites, or major rivers, transmission corridors would not be expected to have outstanding ecological, cultural, or scientific value. Blanket application of the NLCS designation to transmission corridors is therefore inconsistent with the purpose of the designation.

The NLCS Designation is Not Appropriate for the Entire California Desert

The entire project site is designated as NLCS within Alternative 5. Alternative 5 is "based on the premise that all lands in the California Desert have been determined by Congress to be nationally significant and lands not focused on development or other intensive uses under the BLM's multiple use mandate should be included as national Conservation lands. This alternative would include existing transmission corridors." We are of the opinion that it would be extremely short-sighted - and inconsistent with BLM's multiple use mandate - to designate as national conservation lands all BLM lands other than those deemed ideal for solar and wind development under the DRECP. Doing so loses sight of the fact that the DRECP was originally intended to create a voluntary process for streamlining species permitting for renewable energy development, not to "rezone" away most multiple uses - renewable or otherwise - on BLM-administered lands located within the southern quarter of the state of California. It also runs the risk of creating what is in effect "Wilderness" by an act other than that of Congress.

ERROR IN SCREENING OF VARIANCE LANDS IN ALTERNATIVE 1

SMS project variance lands northwest of I-15 are incorrectly screened out of Alternative 1. Chapter 2 of the Alternatives Analysis defines screening criteria that were applied to variance lands in Alternative 1. The screening criteria and applicability to the SMS project site are provided in Table 1. As can be seen, the project does not trigger any of the variance screening criteria, with the exception of Criterion 13. However, the GIS mapping error in Figures 2.3-1 and 2.3-4 (discussed previously) that designated lands northwest of I-15 as NLCS consequently triggered variance land screening Criterion 13. Because the NLCS lands were incorrectly designated on the SMS project site as a result of a GIS error in Alternative 1, areas northwest of I-15 were inappropriately screened from Alternative 1. The NLCS designation should be removed from these areas and the variance lands northwest of the I-15 should be included in Alternative 1 because the project area does not qualify for screening under any of the 21 variance screening criteria.

Table 1: Variance Land Screening Criteria and Applicability to Project Area		
Screening Criteria for Variance Lands	**Soda Mountain Contains**	
	Yes	**No**
1. All designated and proposed critical habitat areas for species protected under the ESA of 1973 (as amended).		X
2. All areas where the BLM has made a commitment to state agency partners and other entities to manage sensitive species habitat; for example, the Desert Tortoise Research Natural Area, including the lands acquired by the Desert Tortoise Preserve Committee, Inc.		X
3. All desert tortoise translocation sites identified in applicable land use plans, project-level mitigation plans or Biological Opinions.		X
4. All wildlife migratory and movement corridors identified in applicable land use plans and recently mapped, through efforts such as South Coast Wildlands.		X
5. All Big Game Winter Ranges identified in applicable land use plans, such as mule deer area in the Bishop Resource Management Plan (RMP).		X
6. National Historic and Natural Landmarks identified in applicable land use plans and DRECP.		X
7. Lands within the boundaries of properties listed in the National Register of Historic Places (NRHP).		X
8. Segments of rivers determined to be eligible or suitable for Wild and Scenic River status identified in applicable land use plans, including associated 0.25 mile corridor.		X
9. Lands within a solar, wind or geothermal energy development ROW grant or application area found to be inappropriate for energy development through an environmental review process that occurred prior to finalization of the Draft DRECP EIS.		X
10. All lands within the proposed Mojave Trails National Monument.		X
11. All conservation lands acquired through donations or use of Land and Water Conservation Funds.		X
12. Wild Horse or Burro Herd Management Areas.		X
13. All ACECs, Research Natural Areas (RNA), and NLCS lands/units identified in DRECP Alternative 1.	X**	
14. All areas with BLM inventoried wilderness characteristics.		X
15. Developed recreational facilities, special-use permit recreation sites, all SRMAs, and all Long Term Vehicle Areas (LTVA) identified in Alternative 1.		X
16. Developed recreational facilities, special-use permit recreation sites, all SRMAs, and all Long Term Vehicle Areas (LTVA) identified in Alternative 1.		X
17. Variance land parcels smaller than 280 acres and/or not capable of being combined with other BLM variance parcels or non-BLM lands in Alternative 1		X

Table 1: Variance Land Screening Criteria and Applicability to Project Area		
Screening Criteria for Variance Lands	**Soda Mountain Contains**	
	Yes	**No**
Development Focus Areas to reach the 280-acre minimum size. (280 acres is the size of two small utility-scale solar projects [20 MW as per CEC] at approximately 7 acres per MW.)		
18. Narrow stringers on cherry stem roads between areas conserved or specially managed.		X
19. Areas within 1 mile of National Scenic and Historic Trail Corridors.		X
20. Designated off-highway vehicle (OHV) open areas.		X
21. All dunes, sand sources, and sand flow corridors.		X
22. All Microphyll woodlands, also known as semi-desert wash woodland/scrub.		X
23. Lands within 0.25 mile of any surface water source or riparian areas (e.g., seeps, springs, lakes, ponds, streams, rivers).		X
Notes: ** The area northwest of I-15 is designated as NLCS in DRECP Alternative 1 as a result of a GIS mapping error in Chapter 2. Alternative 1 presented in Appendix D does not include the NLCS designation northwest of I-15 in the project area.		

Source: CEC 2012 and Panorama Environmental, Inc.

DESERT TORTOISE AND BIGHORN SHEEP MODEL RESULTS ARE INCONSISTENT WITH HABITAT AND GENETIC STUDIES

Appendix C of the Alternatives Analysis provides updated species models and modeling methods. Comments are provided for two species models:

1. Draft species habitat model results for desert tortoise (USFWS least cost corridors) presented in Figure SM-R3B
2. Draft species habitat model results for bighorn sheep (critical linkage)

Analysis of Habitat Suitability and Connectivity in the Soda Mountain Area

SMS submitted an analysis of the habitat suitability and connectivity for desert tortoise and bighorn sheep in the Soda Mountain area (Panorama Environmental 2012; attached hereto as Exhibit 1). The analysis was based on site-specific field surveys of the project area and surroundings that identified no desert tortoise on the project site and limited sign outside project boundaries (URS 2009a). The habitat suitability analysis showed that characterization of the SMS project area based on model results (Nussear et al. 2009) was inconsistent with site-specific surveys of the project area. The model overstated the habitat value for desert tortoise.

The results of subsequent fall desert tortoise surveys (Kiva Biological) 2012), floristic survey (CSESA 2012), and general wildlife survey (CSESA 2012a) of the SMS project area have supported the conclusions of the habitat suitability and connectivity analysis for desert tortoise. No desert tortoise were found on the project site or in the zone of influence surveys. Limited sign was found on the eastern margins of the project area (Kiva Biological 2012).

The fall 2012 surveys found no evidence of bighorn use of the project area and CDFW photographic monitoring of the I-15 underpasses in the area found no evidence of bighorn use of the underpasses (Abella 2012a).

USFWS Desert Tortoise Least Cost Corridors are Inconsistent with Recent Connectivity Studies

Figure SM-R3B, "Draft Species Habitat Model Results for Desert Tortoise (USFWS Least Cost Corridors)"shows the SMS project area as within a least-cost corridor for desert tortoise (Figure 1). This modeling was conducted by USFWS using the habitat suitability results of Nussear et al. (2009). SMS presented data in its DRECP comment letter dated July 23, 2012, that show the habitat suitability presented in Nussear et al. overstates the habitat value for the project area (Panorama 2012; attached hereto as Exhibit 1). This USFWS least-cost corridor (Figure 1) is inconsistent with Penrod et al. (2012), in which species-specific modeling was used to identify movement corridors (Figure 2).

Least Cost Corridors are Inconsistent with USFWS Recovery Plan and Genetic Studies

The least-cost corridor identified in Figure SM-R3B appears to connect suitable habitat areas to USFWS critical habitat areas. In the case of the SMS project area, the USFWS least-cost corridor attempts to connect the Ivanpah critical habitat unit to the Superior-Cronese critical habitat unit. This attempt is ill-founded.

The designation of a least-cost corridor between the Ivanpah critical habitat unit and Superior-Cronese critical habitat unit is inconsistent with the *Revised Recovery Plan for the Mojave Population of the Desert Tortoise* (USFWS 2011), other studies, and the physical environment. The Mojave population of desert tortoise is divided into five recovery units in the Revised Recovery Plan (USFWS 2011). Recovery units were defined on the basis of geographic barriers that coincide with observed variation among tortoise populations (Ibid). The project area is located on the eastern edge of the Western Mojave recovery unit (Figure 1). The Ivanpah critical habitat unit is located in the Eastern Mojave recovery unit. A least-cost corridor in Figure SM-R3B extends through the SMS project area and crosses between these recovery units (Figure 1). This corridor contradicts the Revised Recovery Plan by asserting that there is existing, or possible, connectivity between the West Mojave recovery unit and the Eastern Mojave recovery unit even though their separate designation is premised on the basis of geographic barriers between them.

Figure 1: DRECP Desert Tortoise Least-Cost Corridors With USFWS Recovery Units

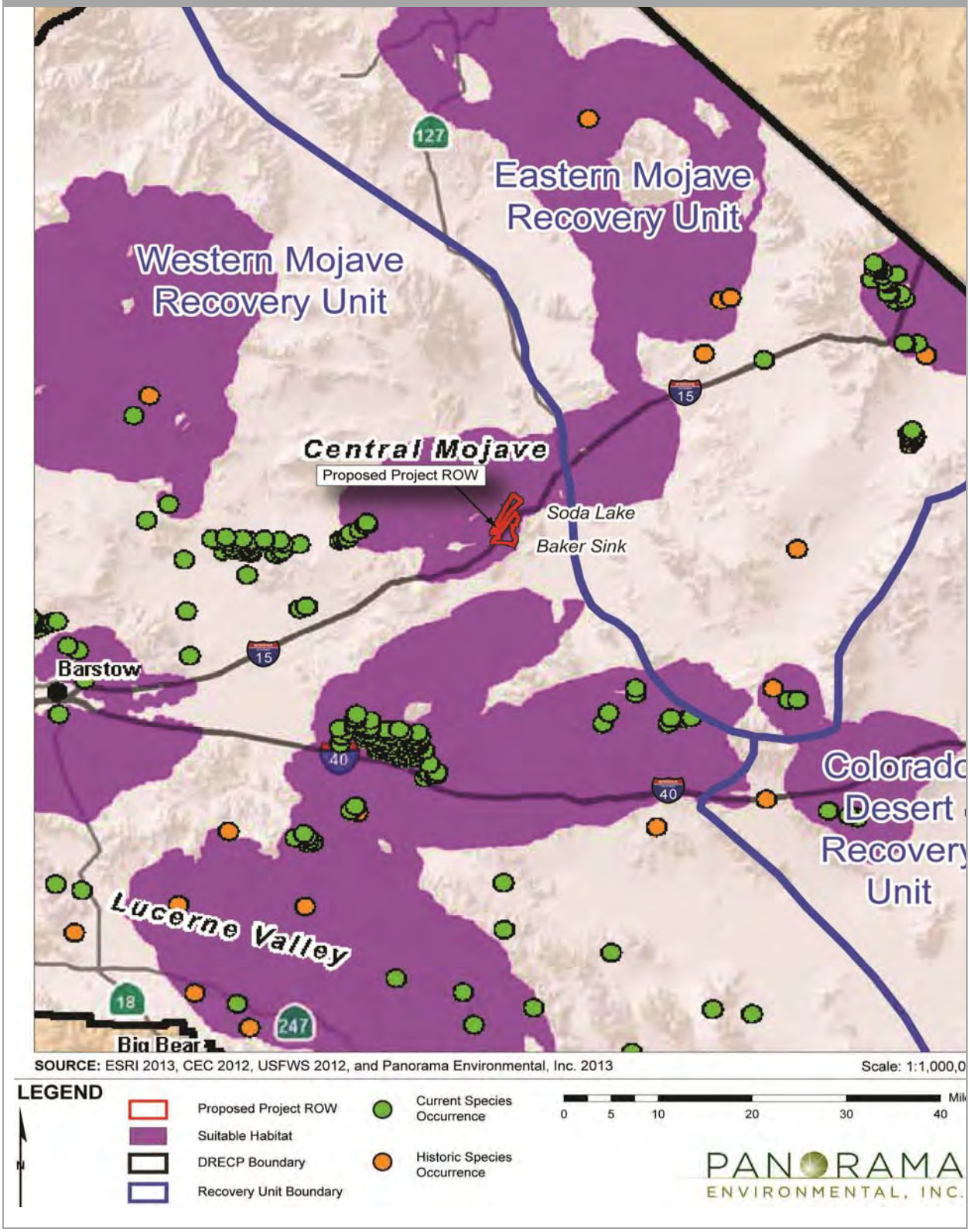

Figure 2: Penrod et al. Desert Tortoise Least-Cost Corridors in SMS Area

SOURCE: ESRI 2012, Penrod, K. et al. 2012, and Panorama Environmental, Inc. 2012

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The objectives identified in the Revised Recovery Plan revolve around the concept of the recovery unit. The recovery objectives include:

- Maintain self-sustaining populations of desert tortoises within each recovery unit into the future
- Maintain well-distributed populations of desert tortoise throughout each recovery unit
- Ensure that habitat within each recovery unit is protected and managed to support long-term viability of desert tortoise populations

Connectivity between recovery units is not necessary to achieve the recovery objectives. It is implicit in the concept of the recovery unit that there are natural barriers to movement between the recovery units that will not be overcome by management actions. The designation of a least-cost corridor linking the Ivanpah/Shadow Valley critical habitat unit to the Superior-Cronese critical habitat unit is inconsistent with the Revised Recovery Plan's definition of recovery units. It is also inconsistent with the Revised Recovery Plan's own assessment of the region surrounding the project area. Specifically, the Recovery Plan states that the population within the Eastern Mojave recovery unit is recognized as relatively isolated from other recovery units on the basis of genetic analysis (USFWS 2011). Baker Sink through Soda Dry Lake is a movement barrier between the Eastern Mojave recovery unit and the West Mojave recovery unit (Ibid). The Baker Sink barrier forms the dividing line between these two recovery units:

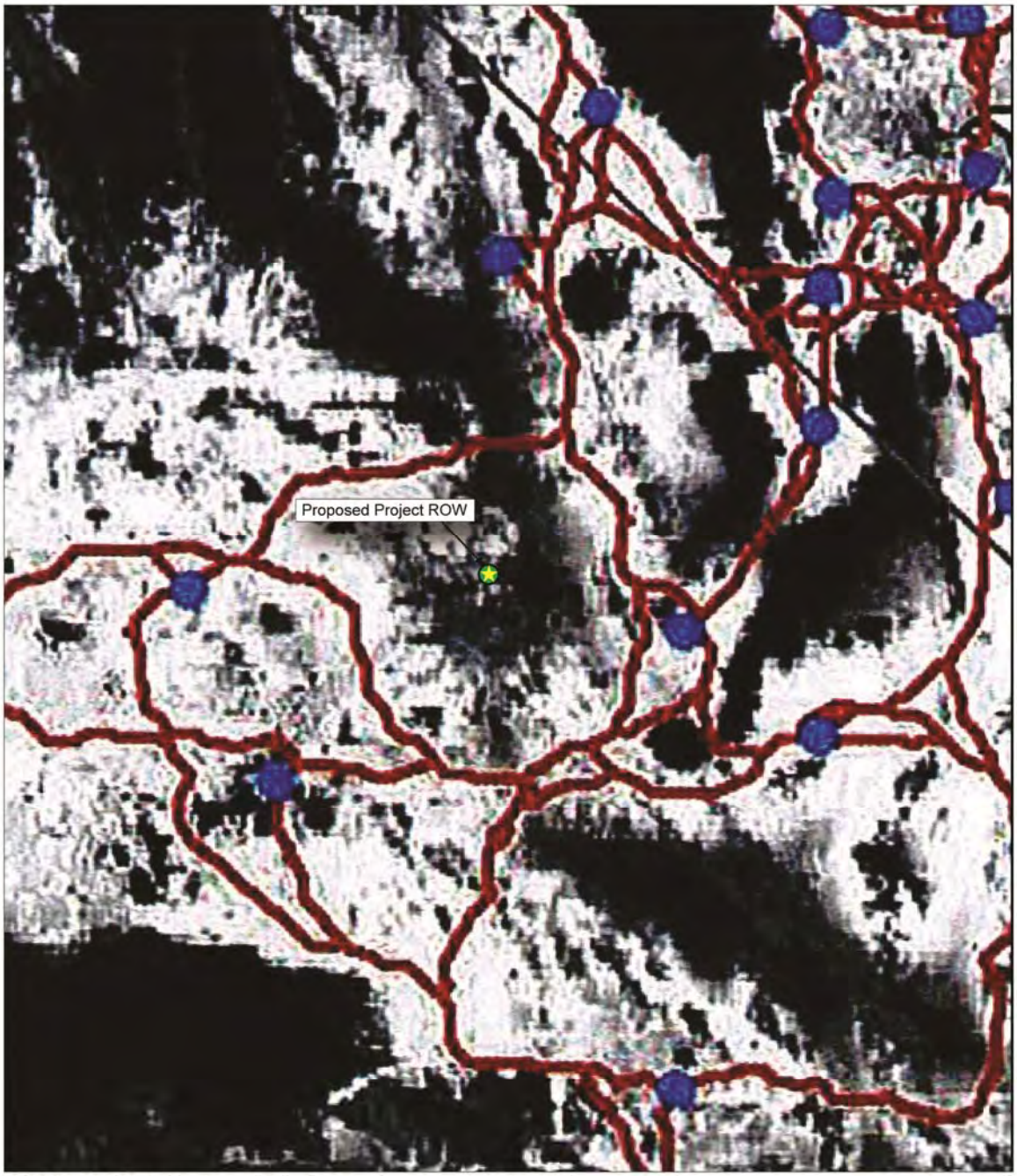
> "*Although gene flow likely occurred intermittently during favorable conditions across this western edge of the recovery unit, this area contains a portion of the Baker Sink, a low-elevation, extremely hot and arid strip that extends from Death Valley to Bristol Dry Lake. This area is generally inhospitable for desert tortoises*." (Ibid)

A study conducted by Hagerty et al. (2010) supported this conclusion from a genetic standpoint by finding that geographic barriers were significantly correlated with genetic differences and that,

> "*The Baker Sink is a low-elevation barrier that begins in Death Valley and separates these topographically different areas*."

Movement areas from Hagerty et al. are shown in Figure 3. The Baker Sink is shown in Figure 4. In short, substantial evidence –in the form of (i) site-specific survey results and habitat suitability analysis; (ii) USFWS' own Revised Recovery Plan; and (iii) genetic studies strongly indicate that tortoise populations are not crossing the Baker Sink and are not connecting between the West Mojave recovery unit and East Mojave recovery unit.

Figure 3: Hagerty et al. Desert Tortoise Movement Routes



SOURCE: ESRI 2012, Hagerty et al 2010, and Panorama Environmental, Inc. 2012

LEGEND

- Proposed Project ROW
- Population Centroid
- Tortoise Movement
- Lowest Probability of Occurrence

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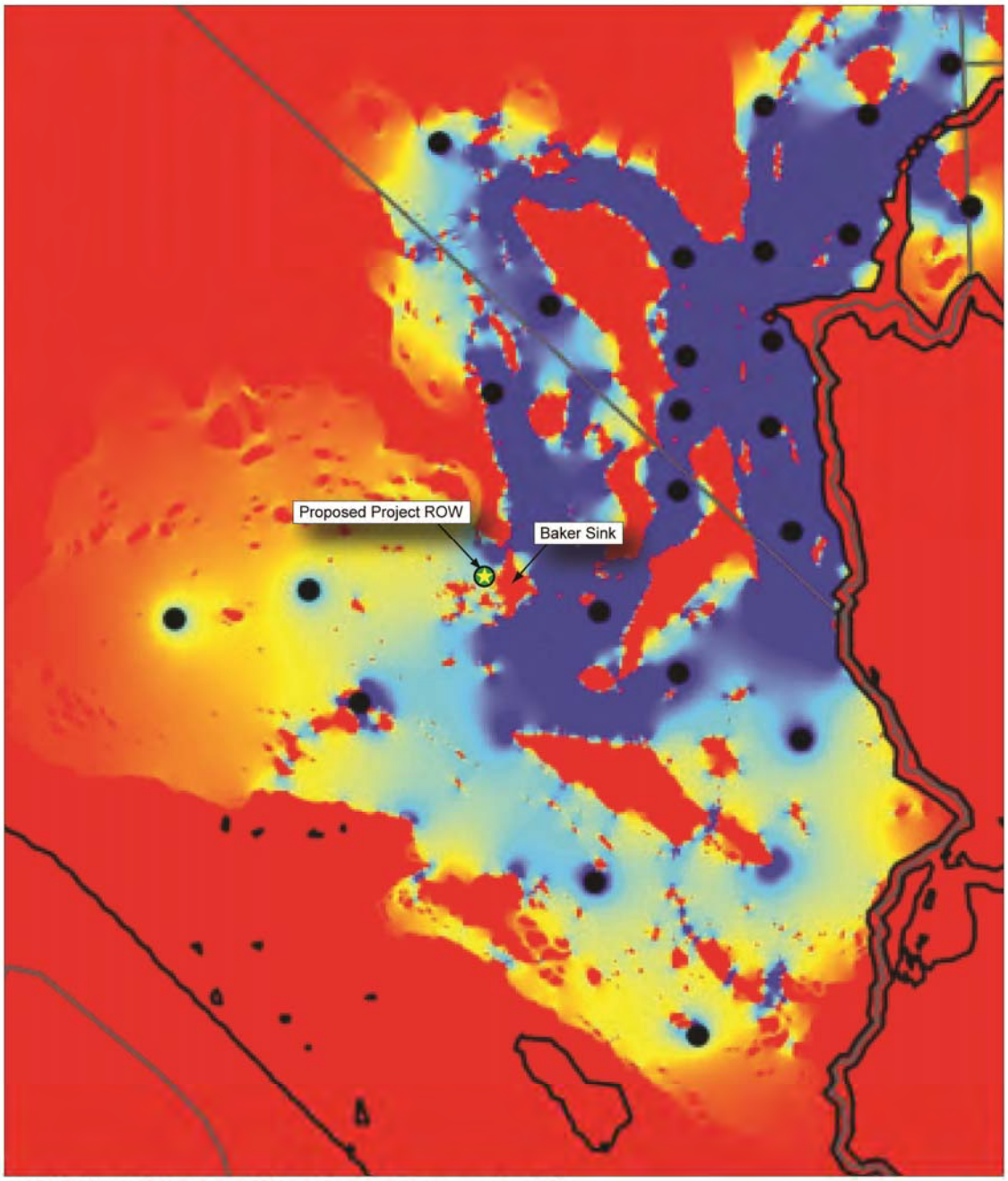
Figure 4: Baker Sink Barrier to Movement



SOURCE: ESRI 2012, Hagerty et al 2010, and Panorama Environmental, Inc. 2012

LEGEND

- Proposed Project ROW
- Population Centroid
- Low Probability of Tortoise Movement
- Tortoise Movement Area

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BIGHORN SHEEP CRITICAL LINKAGE DESIGNATION FOR SODA MOUNTAIN VALLEY IS INACCURATE AND UNSUPPORTED

Figure SM-M1A, "Draft Species Habitat Model Results for Bighorn Sheep (Critical Linkage)" shows the SMS project area within a critical linkage for bighorn sheep (Figure 5 in this letter). The Alternatives Analysis does not include assumptions used in the model development, and does not specify the methods or criteria that were applied to determine the "critical linkages." Section 3.1 of the Alternatives Analysis indicates Mountain and Intermountain Habitat models were developed by CDFW and John Wehausen. Appendix C of the Alternatives Analysis states that a proxy model was used but provides no additional information. The bighorn sheep model assumptions and methodology must be provided so they can be analyzed. Additional time should be allowed to review and comment after the model information is provided to reviewers.

The "critical linkage" figure is inconsistent with field surveys of the SMS project area and investigations that have been undertaken by Soda Mountain Solar, LLC and CDFW regarding bighorn sheep use of the project area.

Bighorn Sheep Surveys

Soda Mountain Solar Surveys

SMS contracted with BioResource Consultants to conduct a helicopter survey of bighorn sheep (see survey results in Figure 6). The survey protocol was determined in consultation with CDFW. The surveys did not include the south Soda Mountains to the east of the project area in order to avoid effects to a known bighorn population during lambing season (see "CDFW 2012 Survey", below). Bighorn sheep were observed during surveys within 10 miles of the project area. Surveyors observed two desert bighorn sheep fleeing down a ravine approximately 8 miles southwest of the project area in the Cave Mountains (BRC 2011). No other individuals or groups were seen in the region during the remainder of the surveys conducted in March and May 2011 (BRC 2011). Five sheep and bedding sites were observed on the slope east of the project site in October 2012 (Kiva Biological 2012).

CDFW 2012 Survey

CDFW conducted a ground count for bighorn sheep on April 30 and May 1, 2012 in the south Soda Mountains, near Zzyzx Spring. Surveyors counted all sheep that could be located on the east side of the range in the vicinity of water. Habitat conditions in the south Soda Mountains are highly suitable for bighorn sheep because of the presence of a year-round water source at Zzyzx and the presence of limestone outcrops for lambing-rearing habitat. A total of 47 sheep in seven groups were identified within the south Soda Mountains during the CDFW 2012 survey (Abella 2012a).

Figure 5: DRECP Bighorn Sheep Critical Linkage and SMS Project Area

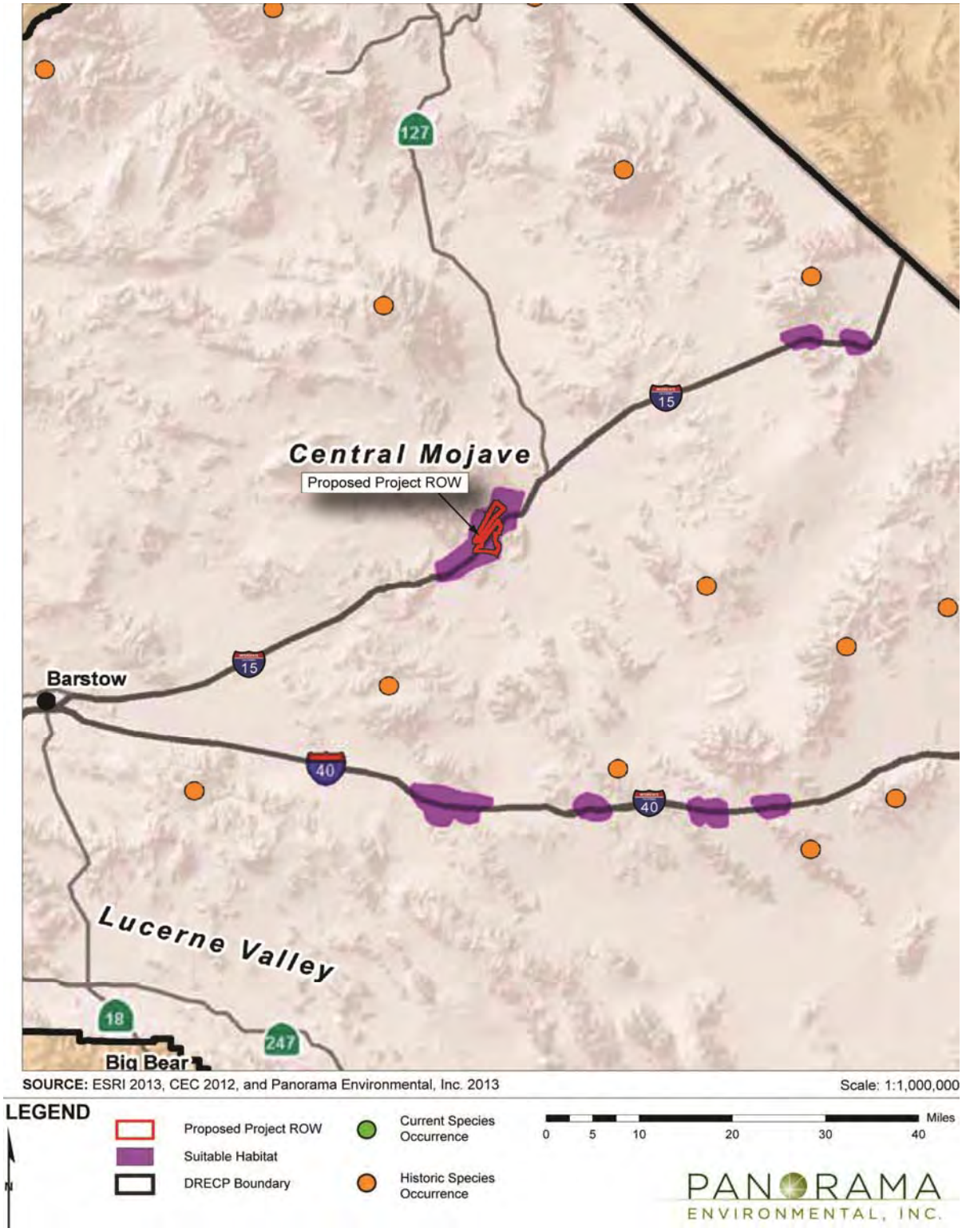
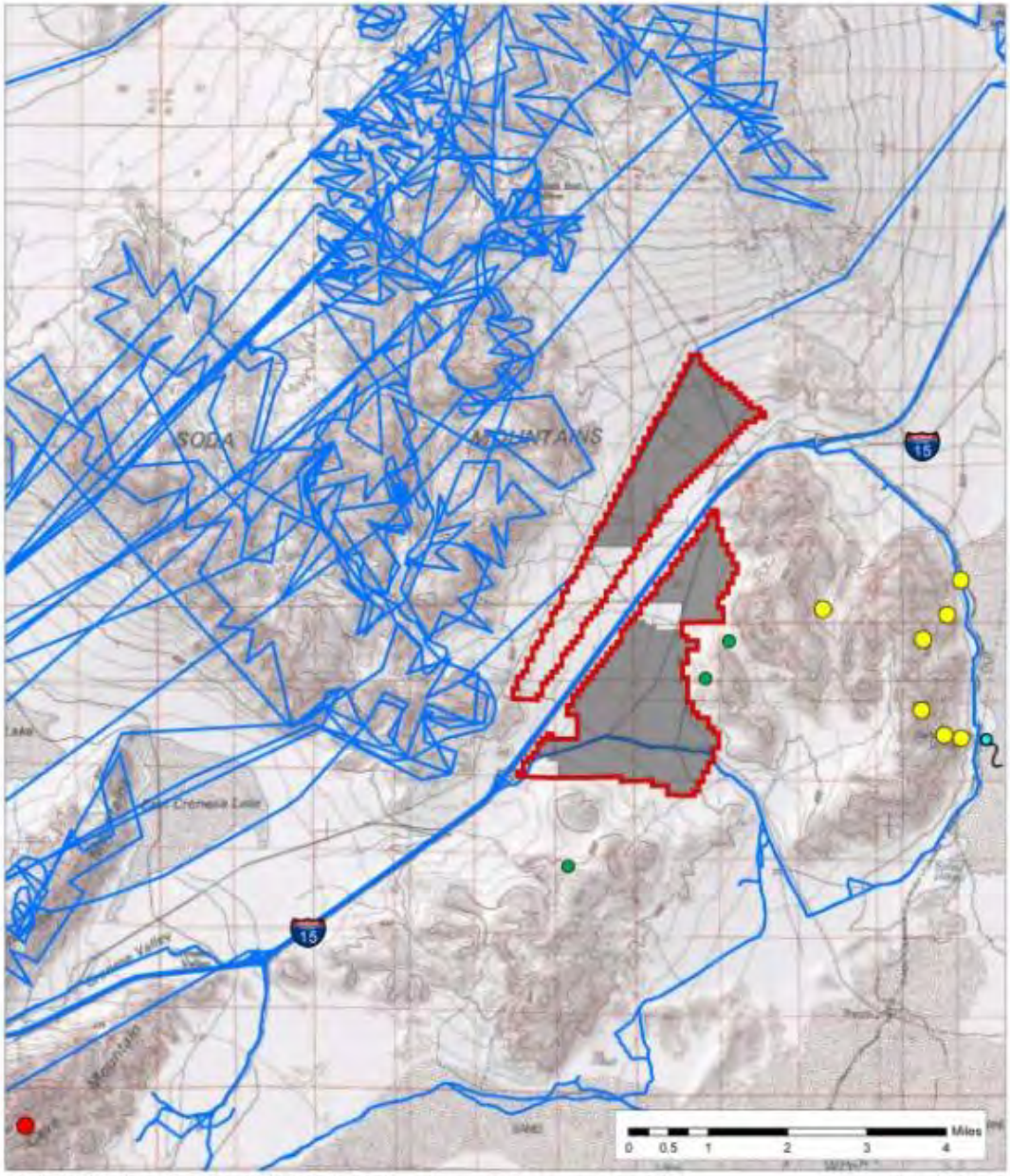


Figure 6: Bighorn Sheep Surveys and Populations in Soda Mountain Region



SOURCE: ESRI 2012, BRC 2011, CDFG 2012, Kiva 2012, and Panorama Environmental, Inc. 2012

Scale: 1:140,000

LEGEND

- Proposed Project ROW
- Potential Solar Array Area
- Zzyzx Spring
- BRC Survey Routes
- BRC Bighorn Sheep and Golden Eagle Location
- CDFG Bighorn Sheep Location
- Kiva Bighorn Sheep or Sign

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Figure 6 shows the recent locations of bighorn sheep as reported in SMS surveys (BRC 2011; Kiva 2012) and CDFW surveys (Abella 2012a). The 2011 SMS helicopter and ground survey (BRC 2011) identified sheep in the Cave Mountains, 7.75 miles south of the project area and Kiva (2012) identified sheep and sign on the western edges of the south Soda Mountains. The CDFW survey found very little sign of recent use by bighorn above the 1,960 foot elevation where sheep were found (Abella 2012a). It appears that the eastern portion of the south Soda Mountains, where most of the sheep were seen, is occupied primarily by females and associated younger sheep in the spring. Given that few adult males were seen, and that there are likely additional males, this population can be projected to fall into the 51 to 100 population size category (Abella 2012a). Abella (2012a) also indicated that the bighorn sheep seem acclimated to the humans at the Desert Research Center at Soda Springs, which is used as a water source for the sheep.

Modeled Bighorn Sheep Habitat

The results of the DRECP bighorn sheep modeling for intermountain and mountain habitats (Figures 7 and 8) are consistent with recent survey results in the SMS project area. There have been many studies of the project area (vegetation, desert tortoise, cultural resources) and none of the surveys have found sign (scat, bedding, trails) in the SMS project area. The lack of sign is evidence of little or no use of the project area by bighorn sheep, which is consistent with the DRECP model results for bighorn sheep intermountain habitat (Figure 7).

Bighorn sheep and sign were consistently found in the mountains in all recent surveys in the project area, zones of influence, and within a 10-mile radius of the project (BRC 2011; CSESA 2012; Kiva 2012; Abella 2012a). These survey results are consistent with the DRECP modeled bighorn sheep mountain habitat (Figure 8).

Analysis of Connectivity in the Soda Mountains

No Evidence of East-West Connectivity in the Soda Mountain Valley

The SMS project area is not a known connectivity or linkage area for bighorn sheep, or a linkage corridor for bighorn sheep (Penrod et al. 2012). No scat, sign, or trails of bighorn sheep were documented on the SMS project during surveys of the project area in 2009 and 2012 (URS 2009b; CSESA 2012; Kiva Biological 2012). Bighorn sheep were identified in the Soda Mountains to the south and east of the project as shown in Figure 6 (Kiva Biological 2012; Abella 2012a).

Bighorn sheep are known to prefer steep, rocky terrain and to avoid flat areas with no cover. It is logical to assume that sheep would move long distances through mountains, rather than across the Soda Mountain valley, which is bisected by northeast-southwest oriented highway I-15 in the valley. Sheep in the project region are likely moving north-south through the south Soda Mountains and there would be no reason to move east-west, given that there are no water sources in the western Soda Mountains or the west side of the valley.

Figure 7: DRECP Bighorn Sheep Intermountain Habitat and SMS Project

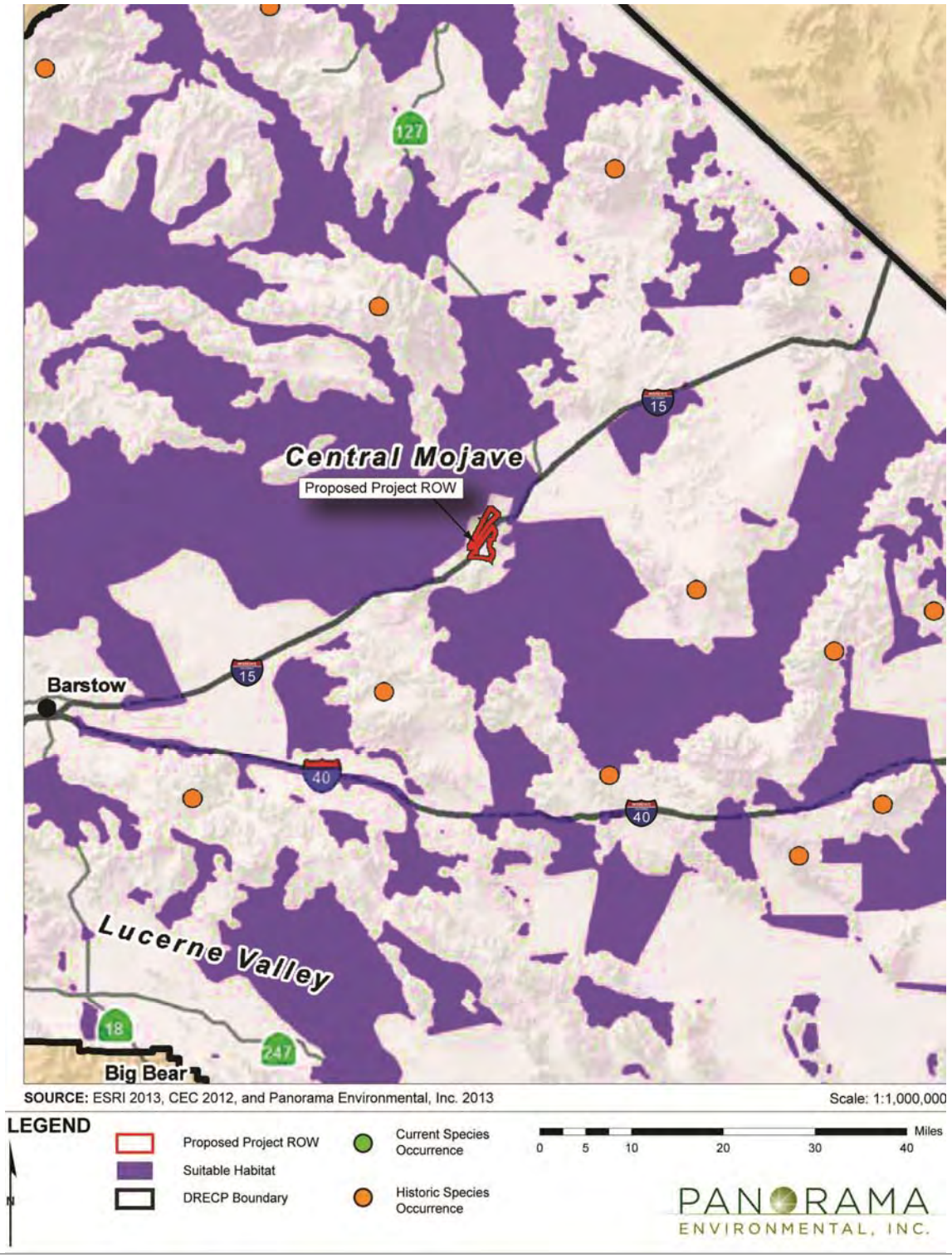
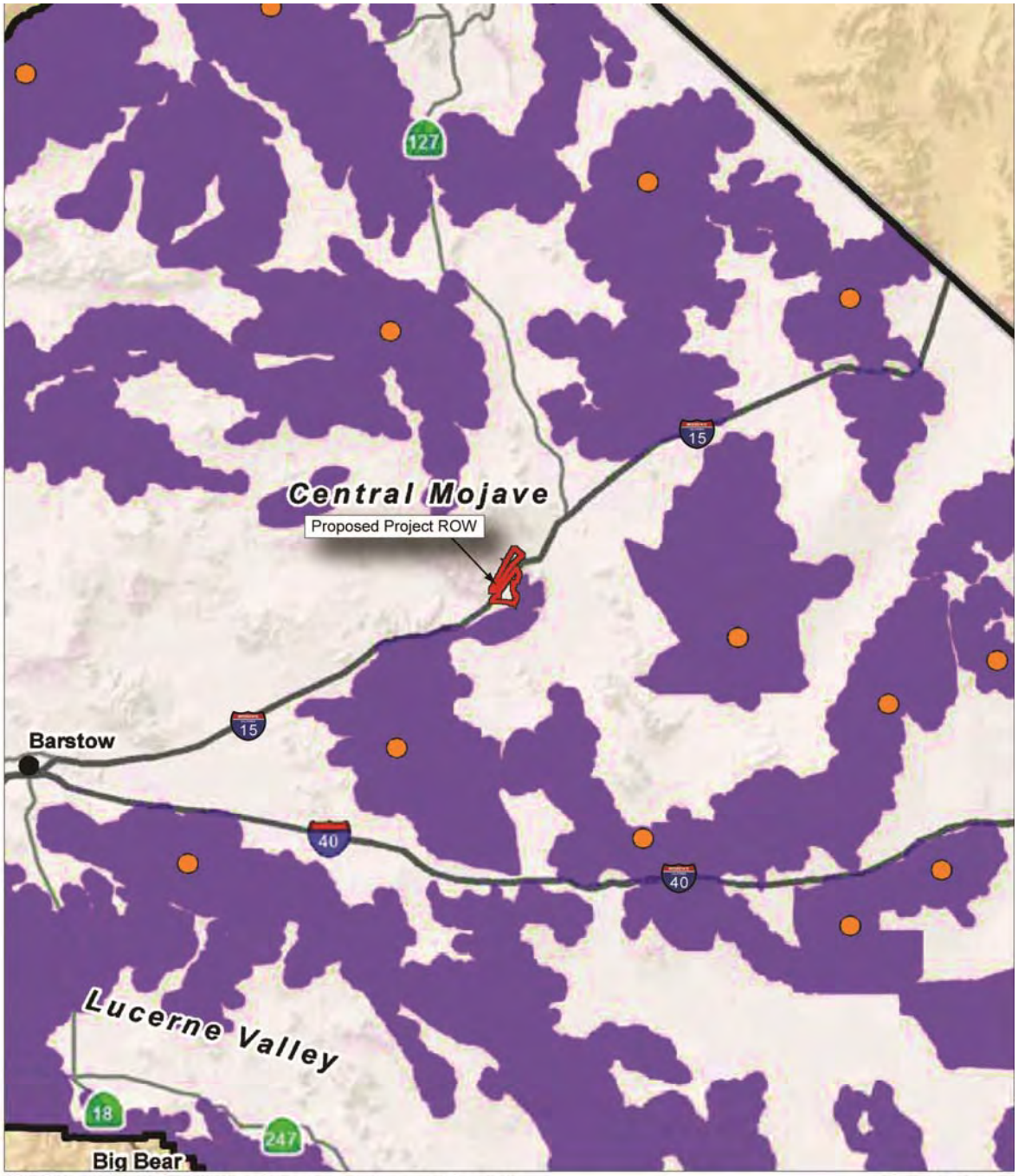


Figure 8: DRECP Bighorn Sheep Mountain Habitat and SMS Project



SOURCE: ESRI 2013, CEC 2012, and Panorama Environmental, Inc. 2013

Scale: 1:1,000,000

LEGEND

- Proposed Project ROW
- Suitable Habitat
- DRECP Boundary
- Current Species Occurrence
- Historic Species Occurrence

Miles: 0 5 10 20 30 40

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CDFW installed cameras in two I-15 underpasses near the SMS project area in August 2012. No sheep have been identified using the underpasses (Abella 2012a).

Literature Shows Highways are a Barrier to Bighorn Sheep Movement
Interstate highways are typically barriers to bighorn sheep connectivity (Turner 2010). Frequent traffic can make sheep, particularly ewes, reluctant to cross roads and actual crossing exposes the sheep to mortality (USFWS 2001). Roads have reduced long-term population viability when they bisect a bighorn sheep group's range (USFWS 2001). I-15 and I-40 have segregated desert bighorn sheep into metapopulations (north, central, and south) with no connectivity across the highways between the metapopulations (Wehausen 2006). I-15 acts as a major barrier to connectivity for bighorn sheep. Sheep have been sighted on the north side of I-15 to the north of the SMS project area, suggesting that they may cross the highway using the underpasses or overpasses to the north of the SMS project area in order to access the south Soda Mountains bighorn population.

Bighorn sheep occasionally use underpasses to cross highways. One study in Arizona monitored wildlife use at three highway underpasses for 10 months and recorded 25 times when bighorn sheep crossed under the highway (AZDOT 2008). Most (88 percent) of the crossings occurred at the culvert located in the most rugged terrain at the narrowest highway span (AZDOT 2008). The study concludes that higher intensity of culvert use was most associated with their proximity to traditional trails of bighorn sheep, while other factors, such as proximity to steep terrain, underpass structure, lines of sight, and other animals' presence may also be important influences (AZDOT 2008). Another study suggests that ungulate underpasses must be a minimum of 14 feet high and 26.3 feet wide (Penrod et al. 2008).

Potential Highway Crossings of I-15 in the Soda Mountain Valley
There are four box culverts (#2, 3, 5, 6 on Figure 8) and two bridges (underpasses 1 and 4 on Figure 9 and 10) that bighorn sheep could potentially use to cross under the I-15 highway near the project area. These box culverts and bridges were evaluated for potential bighorn sheep use (Table 2). The four box culverts (underpasses 2, 3, 5, 6) are unlikely to be used by bighorn sheep due to a combination of freeway noise within the overpass/ box culvert, darkness (inability to see predators), and because they are smaller than the minimum width identified for underpass use by bighorn sheep (Burke 2012; Penrod et al. 2008). Based on the criteria identified in the Arizona study discussed above, the bridge at Opah Ditch (underpass 4, Figure 10) is unlikely to be used by bighorn sheep, even though it is of sufficient size, because it is far from steep terrain. The underpass at Zzyzx Road (underpass 1, Figure 9) has a higher likelihood of bighorn sheep use because it is wider and closest to steep terrain. Game cameras installed by CDFW under the underpasses at Opah Ditch and Zzyzx Road in August 2012 have not detected any bighorn sheep use to date (Abella 2012b). There are also no bighorn sheep trails at either underpass. The

Figure 8: Box Culverts 2, 3, 5, and 6

SOURCE: TerraMetrics 2012, GeoEye 2012, USDA Farm Service Agency 2012, DigitalGlobe 2012, Google Earth Pro 2012, and Panorama Environmental, Inc. 2012

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Figure 9: Underpass 1, North of Zzyzx Road

SOURCE: ESRI 2012, TerraMetrics 2012, GeoEye 2012, USDA Farm Service Agency 2012, DigitalGlobe 2012, Google Earth Pro 2012, and Panorama Environmental, Inc. 2012

LEGEND

Proposed Project ROW

Existing Culvert

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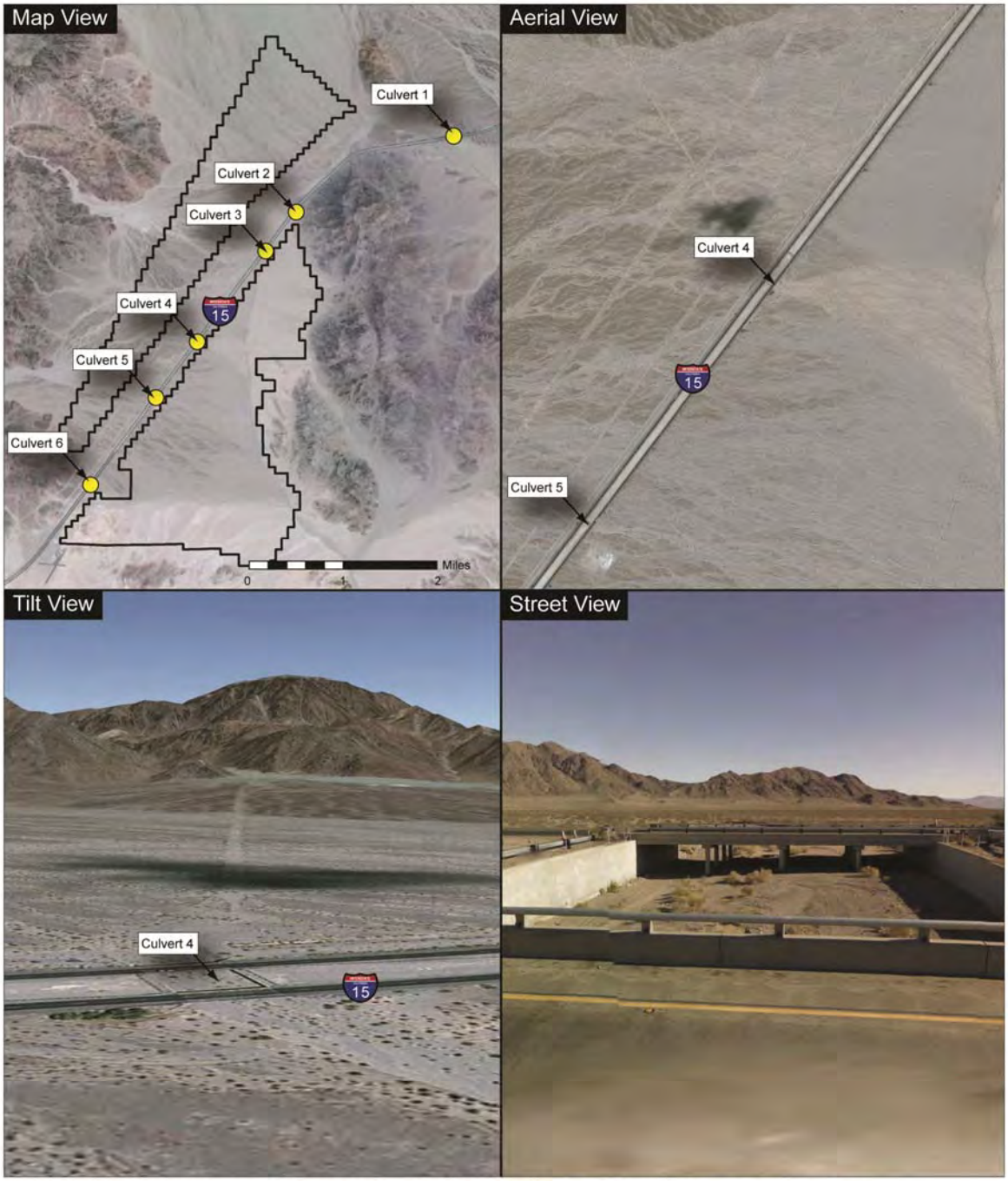
Figure 10: Underpass 4, Opah Ditch



SOURCE: ESRI 2012, TerraMetrics 2012, GeoEye 2012, USDA Farm Service Agency 2012, DigitalGlobe 2012, Google Earth Pro 2012, and Panorama Environmental, Inc. 2012

LEGEND

Proposed Project ROW

Existing Culvert

N

PANORAMA ENVIRONMENTAL, INC.

Table 2: Likelihood of Bighorn Sheep Use of Box Culverts/Bridges for Undercrossing

Underpass	Dimensions (width by length in feet)	Distance to Nearest Mountainous Terrain (miles)	Proximity to Nearest Known Bighorn Sheep Occurrence	Probability of Use
1 (Zyzzx Road bridge)	100 by 15	0.15 north	2.2	**Moderate.** Of adequate size, close to steep terrain, near known location, no bighorn sheep trail, approximately 2.5 miles from mapped occurrence
2 (box culvert)	25 by 15	0.16 east	1.6	**Low.** Under minimum width of 26.3 feet (Penrod et al. 2008)
3 (box culvert)	25 by 15	0.49 east	1.3	**Low.** Under minimum width of 26.3 feet (Penrod et al. 2008), far from steep terrain
4 (Opah Ditch bridge)	80 by 15	1.14 east	1.3	**Low.** Of adequate size, far from steep terrain, no bighorn sheep trail
5 (box culvert)	25 by 15	1.5 east	1.7	**Low.** Under minimum width of 26.3 feet (Penrod et al. 2008), far from steep terrain
6 (box culvert)	25 by 15	0.12 west	2.7	**Low.** Under minimum width of 26.3 feet (Penrod et al. 2008), far from known occurrences

absence of any bighorn sheep tracks or trails near these underpasses in combination with the absence of observed use indicates that any potential bighorn sheep use of these underpasses is infrequent.

Bighorn sheep could also use the I-15 overpasses that cross over I-15 at Zzyzx Road and Rasor Road. Both of these existing overpasses are located within mountainous terrain and near locations where bighorn sheep have previously been sighted. However, there are no bighorn sheep tracks or trails near these overpasses or reports of sightings of sheep using the overpasses, indicating that use of the bridges to cross over I-15 is infrequent.

The DRECP Critical Linkage Map (Figure 5) is Unsubstantiated and Should be Deleted because I-15 is a Substantial Barrier

The DRECP-modeled mountain and intermountain habitat depicted in Figures 7 and 8 reflects current and potential habitat use in the project vicinity fairly well. It is unclear why a separate delineation of "critical linkages" in Figure 5 is needed or what supports the delineation. The intermountain habitat results more accurately identify locations where bighorn sheep could connect between core mountain habitat areas. We suggest removing the critical linkage map because it is unsubstantiated and does not reflect the results of the more precise modeled mountain and intermountain habitat. If the critical linkage map is not removed, at a minimum it

would need to be updated to reflect the reality that I-15 is not permeable except for at specific overpasses and underpasses where conditions are suitable for bighorn sheep crossing, which is essentially the conclusion drawn in Figure 6 of this comment. I-15 experiences near-continuous traffic in the SMS project area. Bighorn sheep would be struck by vehicles if they were to attempt to cross the highway at locations other than the specified overpasses or underpasses. Figure 5 fails to take this into account and ignores the viability of movement through the underpass at Zzyzx Road.

INACCURATE AND INAPPROPRIATE HIGH BIOLOGICAL SENSITIVITY DESIGNATION OF SODA MOUNTAIN VALLEY

The project area is designated as "high biological sensitivity" in the DRECP reserve design. This designation is inappropriate given the biological resource on the site identified in site-specific surveys. This inappropriate designation was discussed at length in previous comments submitted by Soda Mountain Solar, LLC (attached hereto as Exhibit1). Since that comment letter was submitted, supplemental surveys were performed for desert tortoise, burrowing owl, kit fox, bighorn sheep, bats and rare plants in the fall of 2012. The results of these additional surveys are provided in Table 3. These additional surveys support the conclusion that the project area does not meet the criteria for "high biological sensitivity".

Table 3: Surveys and Results

Survey	Survey Timing	Results
Desert tortoise	Fall 2012	Protocol survey of eastern extremes of project area. No live tortoise observed. Sign along toe of hill slope and on eastern margin of project area
Floristic survey for rare plants	Fall 2012	No special-status plants
Bighorn sheep	Fall 2012	No bighorn sheep or trails on site. Bighorn and sign observed in mountainous area east and south of the project.
Bats	August 2012	No special-status bats observed on site. Townsend's big-eared bat observed at Blue Bell mine; Pallid bat observed at Otto Mine.
Burrowing owl	Fall 2012	Active burrows and sign of recent use
Kit fox and American badger	Fall 2012	Kit fox and dens observed. American badger sign.

Appendix H of the Alternatives Analysis (CEC 2012) identifies the methods that were used to formulate the reserve design. The "high biological sensitivity" designation appears to reflect the assumption that the SMS project area is within a desert tortoise least-cost corridor. As stated above in "USFWS Desert Tortoise Least Cost Corridors" (i) site-specific survey results and

habitat suitability analysis; (ii) USFWS' own Revised Recovery Plan; and (iii) genetic studies strongly indicate that tortoise populations are not crossing the Baker Sink and are not connecting between the West Mojave recovery unit and East Mojave recovery unit.

The substantial data that has been collected on the SMS project area does not support a conclusion of "high biological sensitivity." This designation should be revised in the Draft EIS/EIR to reflect the resources that are on the site.

THE SODA MOUNTAIN VALLEY SHOULD BE DESIGNATED A DEVELOPMENT FOCUS AREA

The SMS project site warrants a DFA designation within the DRECP, across all alternatives. The 4,400-acre project site is currently not located within a DFA in any of the five draft DRECP alternatives.

DFA Designation Criteria

The Alternatives Analysis states that suitable locations for DFAs were identified:

> "[u]s[ing] resource distribution data in combination with agency and stakeholder input to identify and characterize areas suitable for renewable energy development based on the principles laid out above, and accounting for the conservation goals identified during the reserve design process." (CEC 2012, page 1.2-22).

There are three guiding principles identified in the Alternatives Analysis. In general, they include:

1. Develop generation "either on already disturbed land or in areas of lower biological value."
2. Aggregate transmission to the extent feasible to avoid transmission cost, sprawl, and disturbance. This principle reduces disturbance to biologically sensitive areas.
3. Allow sufficient flexibility in the Plan so as to not limit competition or "unnecessarily result in distorted or environmentally incompatible incentives when implemented, i.e., where feasible, the Plan should remain market neutral between different technologies or different project configurations." (CEC 2012, page 1.2-21.)

Reserve Design Designation

The project area is designated as "high biological sensitivity in the DRECP reserve design, which supports its exclusion as a DFA; however, this designation is inappropriate, as demonstrated above. Site-specific survey data do not support a conclusion of "high biological sensitivity" due to the low level of biological resources identified in site-specific surveys, as discussed under "Inaccurate and Inappropriate High Biological Sensitivity of Soda Mountain Valley." Therefore, designation of the project area as a DFA would not conflict with conservation goals.

Guiding Principles
The project area would be consistent with all three guiding principles outlined in the Alternative Analysis, warranting its designation as a DFA.

The project site is located in an area that contains substantial human disturbance and has lower biological value. Anthropogenic disturbance of the Project site is abundant, including the presence of I-15, multiple linear projects, OHV recreational use, and the former Arrowhead Highway. The site-specific species data for the project site demonstrate limited biological value for special status species, both as habitat and as a connectivity corridor.

Development at the project site would allow aggregation of transmission, thereby reducing transmission sprawl, cost, and disturbance. Located within a Section 368 energy corridor and RETI CREZ, the Project site already has been identified as suitable for substantial infrastructure development and is one of the primary transmission and transportation routes into California. Moreover, the BLM has concurred that development of the Project would not conflict with the transmission objectives of the Section 368 corridor (BLM 2009). LADWP's system impact study indicates that its existing transmission line through the Project site has sufficient capacity to accommodate 350MW of renewable generation without the need for upgrading. Because of its proximity to existing roads and transmission infrastructure, no generation intertie transmission line construction is necessary and access road development would be limited to internal access.

Alternatives
Designation of the project area as a DFA under each alternative would not conflict with selected themes of each alternative (excluding the No Action Alternative) as described in *Primary Features of DRECP Alternatives* and briefly summarized in Table 4, below.

Table 4: Alternatives Characteristics

Alternative	Geographic Distribution of Development	Resource Conflicts	High and Moderate Biological Sensitivity Lands in DFAs	Project Site Conflicts
1	Low-conflict disturbed lands	Lowest	70,559 (6 percent of DFAs)	Project site has low biological value and contains existing infrastructure and other signs of human disturbance; therefore, it would be an appropriate DFA under Alternative 1.
2	Distributed across plan area	Moderate	477,051 (26 percent of DFAs)	Project site has low biological value and contains existing infrastructure and other signs of human disturbance; therefore, it would be an appropriate DFA under Alternative 2 because it would not add to amount of resource conflict.

Table 4: Alternatives Characteristics

Alternative	Geographic Distribution of Development	Resource Conflicts	High and Moderate Biological Sensitivity Lands in DFAs	Project Site Conflicts
3	Focused on western portion of plan area	High in West Mojave; moderate elsewhere	507,827 (26 percent of DFAs)	The project site has low biological value and thus would not create more resource conflicts; however, the project site is not located in the West Mojave area near other DFAs in this Alternative. Past reports have noted that Alternative 3 has least impact on tribal lands (e.g., Overview and Discussion of DRECP Alternatives, DRECP Stakeholders Meeting, July 2012 [REAT Agency Team 2012]). The DRECP does not identify culturally sensitive areas in the project area or its vicinity. Thus, designation of the project site as a DFA under Alternative 3 would not increase impacts to tribal concerns.
4	Distributed across plan area	Moderate	191,427 (13 percent of DFAs)	Project site has low biological value and contains existing infrastructure and other signs of human disturbance; therefore, it would be an appropriate DFA under Alternative 4 because it would not add to amount of resource conflict.
5	Distributed across plan area	Moderate to high	690,013 (30 percent of DFAs)	Project site has low biological value and contains existing infrastructure and other signs of human disturbance; therefore, it would be an appropriate DFA under Alternative 5 because it would not add to amount of resource conflict.
6	Distributed across plan area	Moderate to high	371,926 (22 percent of DFAs)	Project site has low biological value and contains existing infrastructure and other signs of human disturbance; therefore, it would be an appropriate DFA under Alternative 5 because it would not add to amount of resource conflict.

Source: CEC 2012.

The Project site's designation as a DFA would comport with the three guidelines described above, and its low biological value means that it is not vital for conservation. We request that the preparers of the DRECP and its associated NEPA and CEQA reviews draw from the wealth of existing project-specific data to substantiate a DFA designation for the project site across all alternatives.

APPENDIX E

The myriad of allowable uses and use restrictions of Appendix E of the Alternatives Analysis (CEC 2012) are extraordinarily sweeping in their effect. While they ostensibly provide some flexibility for development, the use restrictions and mitigation requirements are so stringent that they either directly or effectively prohibit development altogether. They are also confusing and potentially inconsistent. Take, for example, the general desert tortoise management provisions within BLM lands, which categorically prohibit utility-scale energy development within BLM conservation lands (Appendix E, page 56), and which appear to conflict with some Alternatives that allow development within reserve lands as follows (Appendix E, pages E-60 and E-61):

Alternative	Live Tortoise Limit	Mitigation Ratio
1, 2, 4, 6	No more than 5 per non-linear project within reserve system	5:1
3, 5	No utility scale energy development allowed within BLM reserve system; more than 2 for non linear projects within reserve system	10:1

In addition, while the provisions in the table above appear to allow development on their face, they will prohibit it in practice. Very few, if any, project survey results will remain below the live tortoise limit of alternatives 1, 2, 4 and 6, and, even if they do, a mitigation ratio of 5:1 will make the project cost prohibitive. It is highly unlikely that any non-linear project survey results outside the BLM reserve system will remain below a two tortoise limit (which essentially requires no live tortoise identification on-site under USFWS guidance, and, to our knowledge, has only occurred on two solar projects on BLM-administered lands to date) and, even if they did, a mitigation ratio of 10:1 for the entire project is impossible to justify under a project feasibility analysis.

Moreover, if a project's survey results indicated two or fewer live tortoises, why should the project be subject to a 10:1 mitigation ratio when its extraordinarily low survey results suggest that habitat quality on the site is poor? If the REAT agencies desire to impose new, higher mitigation ratios within DRECP reserve lands, shouldn't a project's mitigation burden still be directly correlated to its survey results (as it usually is under project-specific incidental take authorizations), rather than inversely, as here?

The second question above is important because it raises the issue of proportionality. Under state law, mitigation for a project must be "roughly proportional" to its impacts, just as dedications of land under federal law must be "roughly proportional". *Napa Citizens for Honest Gov't v Napa County Bd. of Supervisors*, 91 Cal.App.4th 342, 364 (2001); E*nvironmental Council of Sacramento v City of Sacramento*, 142 Cal.App.4th 1018, 1040 (2006) ; 14 Cal Code Regs §15126.4(a)(4)(B); *Dolan v City of Tigard,* 512 US 374 (1994). The same question also invites scrutiny under the arbitrary and capricious standard of judicial review of the Administrative Procedure Act. *Marsh v.Oregon Natural Res. Council*, 490 U.S. 360 (1989).

The negative manner in which the DRECP reserve design and many of the restrictions of Appendix E have been defined similarly invite scrutiny. Although the DRECP reserve design distinguishes between high and moderate biological sensitivity lands, it is, at its heart, simply defined negatively as all undeveloped, unprotected lands that are not within a Development Focus Area (DFA), irrespective of the fundamental biological values of the lands themselves, the only distinction being moderate and high sensitivity.

The preliminary desert bighorn sheep habitat map (Map 1) on page E-84 of Appendix E is another example; the map categorically defines bighorn inter mountain (i.e., linkage) habitat as all lands lying between core mountain habitat segments that aren't already legislatively and legally protected, without any reference to the fundamental biological values of the lands in question or an assessment of their suitability as bighorn linkage habitat.

Limitations within linkage and wildlife corridors appear to be similarly arbitrary and divorced by design from on-the-ground conditions. For example, to manage for bighorn by asserting that "No new development is allowed within the specific interstate crossings identified in Wehausen (2012)" (Appendix E, page E-81) leaves no room for an on-the-ground assessment of the validity of each programmatically imposed interstate crossing designation. Nor does it leave room for projects that may actually be able to improve pre-project interstate crossing rates through project-specific mitigation. Rather than an outright prohibition, the measure should require any new development within specific interstate crossings to improve pre-project interstate crossing rates. Similarly inflexible percentage-based limitations on cumulative ground disturbance within linkage and wildlife corridors also appear in Appendix E (e.g., pages E-58, E-81), without any substantiation as to why a particular percentage has been applied.

Appendix E is so far reaching and complex that an exhaustive assessment of its contents could not be completed within the short comment period for review of the Alternatives Analysis. It is our hope, however, that the examples above demonstrate basic principles that should be carried forward through the entirety of Appendix E.

APPENDIX I PENDING PROJECTS

Appendix I of the Alternatives Analysis (CEC 2012) identifies DRECP criteria for the processing of existing BLM right-of-way applications. We recommend the following changes to make the criteria more balanced.

1. Projects on BLM land that receive a ROD prior to issuance of the DRECP ROD.

This criterion will incentivize the misuse of project-specific land use plan amendment protests. Protestors will try to delay protest resolution beyond the date of the DRECP ROD. We recommend adding a clause that also includes the RODs of projects that were subject to the protest resolution process at the time of issuance of the DRECP ROD.

2. Projects proposed on BLM lands that do not receive a ROD prior to issuance of the DRECP ROD.

Criterion 1) under this category exempts from the land use allocation decisions of the DRECP any project applications filed before June 30, 2009 within a BLM Solar Energy Zone. However, the "pending projects" exemption of the PEIS also applies to applications filed *outside* Solar Energy Zones before October 27, 2011.

The pending projects exemption of the Solar PEIS is the fulcrum upon which many compromises were made by the environmental community on one side and the solar industry on the other. It would be unfortunate if the DRECP were to upset such a hard-won (and well-supported) collaborative balance, especially given that it is embodied in a comprehensive, multi-state land use plan amendment that is less than four months old.

Criterion 1 therefore should include all pending projects under the Solar PEIS. Short of that, Criterion 1 should apply to "pending projects" within variance areas identified by the Solar PEIS as well as Solar Energy Zones, but not exclusion areas. Or, at the very least, Criterion 1 should apply to all applications filed before June 30, 2009 if they are located in Solar PEIS variance areas or Solar Energy Zones. Although still a much reduced form of the pending project exemption of the Solar PEIS, the latter would more fittingly comprehend only those applications filed within variance areas or Solar Energy Zones before BLM began to formally designate areas best suited for solar energy development and before the DRECP planning agreement had been developed.

3. Add a new, third criterion for projects proposed on BLM lands that do not receive a ROD until 60 days or more after issuance of the DRECP ROD.

As evidenced by our comments above (as well as by our July and August 2012 comments on the DRECP) the landscape-scale modeling assumptions of the DRECP will not always correspond with ground-truthed, site-specific data. The DRECP therefore should be flexible in instances where the DRECP's landscape-scale land use allocations are at odds with site-specific data. To

that end, we recommend adding a third criterion for projects that do not receive a ROD until 60 days or more after the issuance of the DRECP ROD, as follows:

> 3) A project with a published Draft EIS or EA later than 60 days after the release of the DEIS for the DRECP (expected late summer 2013) provided the project-level NEPA document (FEIS for projects with a DEIS published before the release of the DEIS for the DRECP) includes:
>
> a) Analysis using the best available information at the time of publication, including data developed in support of DRECP conservation and recreation strategies,
>
> b) Analysis describing the relationship between the project and the DRECP conservation and recreation strategies, and
>
> c) Analysis conclusively demonstrating that the landscape-scale land use allocation decisions of the DRECP are unsupported by the best available site-specific information for the project.

Because it would be resource-based rather than strictly temporal, our recommended exemption would not be as categorical as the other exemptions; it would apply only to the extent of the resource discrepancies identified in factor c) proposed above.

REQUEST FOR EXTENSION OF TIME FOR REVIEW AND COMMENT

Soda Mountain Solar, LLC requests an extension of time to review and comment on the extensive materials posted for the Alternatives Analysis. The comment period should be extended by 60 days to allow for a review period commensurate with the amount of time commonly allowed for public review of a Draft EIS of the same size as the Alternatives Analysis.

CONCLUSION

To conclude, the unprecedented size of the DRECP of course requires generalized, over-inclusive measures to a certain degree in order for its implementation to be feasible. But it need not be so monolithic in its application as proposed in the Alternatives Analysis, particularly when the vast amount of land slated for inclusion within the DRECP reserve system is roughly eight times larger than the amount of land slated for development. This discrepancy leaves ample room for significantly more flexibility than currently proposed.

Soda Mountain Solar, LLC appreciates the opportunity to review and comment on these documents in advance of the Draft EIS/EIR. Thank you for reviewing our comments. We request that these comments be incorporated into the Draft EIS/EIR for the DRECP.

Sincerely,

for

Adriane E. Wodey
Manager
Soda Mountain Solar, LLC.

Exhibit 1: SMS Comments on July 25, 2012, Stakeholder Meeting Materials
SMS Comments on Baseline Biology Report July 24, 2012

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Attachment 1

SMS Comments on July 25, 2012, Stakeholder Meeting Materials

SMS Comments on Baseline Biology Report

August 9, 2012

California Energy Commission
Dockets Office, MS-4
Docket No. 09-RENEW EO-01
1516 Ninth Street
Sacramento, CA 95814-5512

Subject: Comments on DRECP July 25 and 26, 2012 Stakeholder Meeting Materials
Docket Number 09-RENEW EO-01

Dear Sir/Madam:

Soda Mountain Solar, LLC, a subsidiary of Bechtel Development Company, Inc., is submitting comments in response to materials and information presented at the Desert Renewable Energy Conservation Plan (DRECP) Stakeholder Committee Meeting on July 25 and 26, 2012. The Soda Mountain Solar project (Project) is a proposed 350 megawatt photovoltaic solar generating facility located on BLM-administered lands in San Bernardino County, California (Figure 1). The BLM right-of-way Serial Number for the Project is CACA-49584. These comments specifically address inappropriate proposed designations for the Project site in the DRECP, namely:

- A high biological sensitivity designation (Project site biological reports do not support a moderate biological sensitivity designation);
- A high conflict Development Focus Area (DFA) designation (unsupported by Project site biological reports and land use planning status); and
- Lack of DFA designation for the Project site across draft DRECP alternatives (DFA designation warranted across all alternatives due to prior disturbance, Section 368 status, and demonstrated lack of biological and land use planning conflicts).

As mentioned below, our opinion on these matters is backed by three years of Project site-specific data presently on file with the BLM, as well as by a rigorous, peer reviewed analysis of the modeling assumptions of the DRECP previously filed under this docket.

Finally, we also recommend carrying forward into the DRECP the "pending projects" concept embodied in the Solar Energy Development Programmatic Environmental Impact Statement (PEIS) insofar as the DRECP concerns BLM-administered lands.

INAPPROPRIATE CLASSIFICATION OF THE SODA MOUNTAIN PROJECT WITHIN THE BIOLOGICAL RESERVE DESIGN

Reserve Design and Categories

A biological reserve design was prepared for the DRECP to guide the California Environmental Quality Act/National Environmental Policy Act (CEQA/NEPA) alternative development process. Among other categories, the biological reserve design identifies areas of high and moderate biological sensitivity. Areas of high and moderate biological sensitivity are proposed for conservation as a part of the DRECP.

The plan-wide biological reserve design for the DRECP was developed using Marxan (Ball et al. 2009) and expert-based analysis. Marxan is a computer-based planning tool to aid in reserve design[1]. Marxan requires data on species habitat and quality to optimize the reserve design. The plan-wide biological reserve design includes eight categories. The reserve categories were defined in the presentation for the April 25 and 26, 2012, DRECP stakeholder meeting and are presented in Table 1, below (DRECP 2012a).

Marxan does not consider data uncertainty or accuracy, therefore the quality of the reserve design is dependent on the quality of the input data. According to the DRECP, the plan-wide biological reserve design was refined through expert-based analysis, post-Marxan, through consideration of:

- Species habitat distribution and occurrences;
- Natural communities;
- Large habitat blocks;
- Habitat linkages;
- Physiographic and environmental characteristics; and
- Ecological processes (DRECP 2012a).

At the July 25th stakeholder meeting, the BLM stated that the reserve design was based in large part on the "naturalness" of the landscape. The use of models based on habitat naturalness was used in lieu of species specific modeling and connectivity analysis, or detailed, site-specific data because the DRECP area is very large and it would be infeasible to assess each of the covered species in the entire Plan Area at a site-specific level.

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[1] The Marxan objective function seeks to optimize the reserve design through econometrics by applying costs for preservation within reserve areas and penalties to areas of high conservation value that are not preserved (Ball et al. 2000). The optimal design has the lowest reserve cost with lowest penalties.

Table 1: Reserve Categories and Descriptions	
Reserve Category	**Description**
Legislatively and Legally Protected Areas	Existing protected lands; emphasis on existing protection and management of biological resource values. No renewable energy development covered by DRECP.
High Biological Sensitivity	Based on Marxan Scenario 5 additional conservation area zone (blue areas), desert tortoise (conservation areas and least cost corridors), Mohave ground squirrel conservation areas and range, flat-tailed horned lizard management areas, major rivers, desert linkage network, and expert input. Higher biological sensitivity signifies areas where biological resources are more sensitive to perturbation or where biological resources are concentrated or where highly sensitive biological resources occur. In general, fewer uses or less intensive uses are compatible with these areas.
Moderate Biological Sensitivity	Based on Marxan Scenario 5 conservation area zone (green areas) and other biological resource information, including species occurrence and model data, natural community data, landscape-level information, and expert input. In general, moderate biological sensitivity signifies areas where biological resources are moderately sensitive to perturbation or where biological resources are less concentrated or where moderately sensitive biological resources occur. In general, more uses or more intensive uses are compatible with these areas.
Military and Military Expansion Mitigation Lands	No renewable energy development or conservation covered by DRECP currently displayed or considered (subject to change pending DOD input).
Open OHV Lands	Biological conservation is area dependent.
Tribal Lands	No renewable energy development or conservation covered by DRECP currently displayed or considered (subject to change pending tribal input).
Impervious and Urban Built-up Land	Utility-scale renewable energy development and conservation unlikely.
Undesignated	Conservation unlikely.

Source: DRECP 2012a; DRECP 2012b

Why the Designation of the Soda Mountain Solar Project Site is Inappropriate

Although the DRECP is a landscape-scale endeavor, more detailed regional and local species specific analyses should replace large scale modeling based on habitat naturalness.[2] In this instance, the Project site is designated as "Plan-wide Conservation Area – High Biological Sensitivity – Public" within the plan-wide biological reserve (Figure 1). The output of the Marxan analysis presented in the meeting materials showed a moderate biological sensitivity for the Project site (DRECP 2012a). The elevation to high biological sensitivity was therefore an output of the expert-based analysis. The high biological sensitivity designation indicates that the area contains biological resources that are sensitive to perturbation, high concentrations of biological resources, or highly sensitive biological resources. However, as explained below, neither a High Biological Sensitivity nor a Moderate Biological Sensitivity designation is consistent with the multiple Project-specific, habitat and focused species field surveys that have been on file with the BLM under right-of-way application CACA-49584 since 2009.[3]

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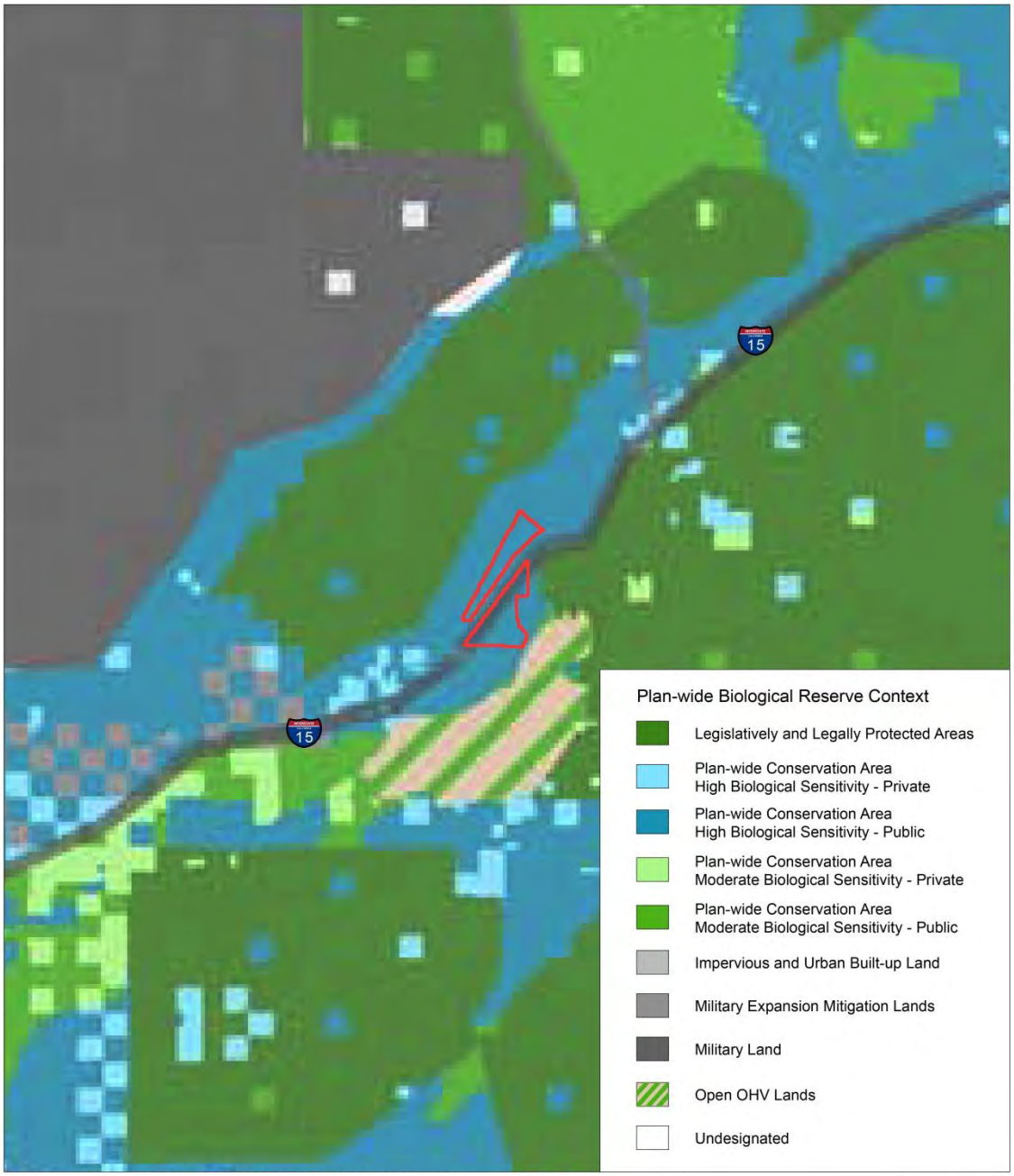
[2] This approach is recommended in *California Essential Habitat Connectivity Project: A Strategy for Conserving a Connected California* (Spencer et al. 2010), which specifically states:

> "*Essential Connectivity Areas are placeholder polygons that can inform land-planning efforts, but that should eventually be replaced by more detailed Linkage Designs, developed at finer resolution based on the needs of particular species and ecological processes. It is important to recognize that even areas outside of Natural Landscape Blocks and Essential Connectivity Areas support important ecological values that should not be "written off" as lacking conservation value. Furthermore, because the Essential Habitat Connectivity Map was created at the statewide scale, based on available statewide data layers, and ignored Natural Landscape Blocks smaller than 2,000 acres; it has errors of omission that should be addressed at regional and local scales*".

[3] SMS has completed detailed environmental studies within the proposed Project site as part of the right-of-way application process, including: desert tortoise survey; golden eagle and bighorn sheep survey; special-status plant survey; Mojave fringe-toed lizard survey; avian surveys; habitat assessment; water resource investigation and delineation; hydrologic and groundwater evaluation; geologic characterization; and a percolation and scour analysis. The results of each of these surveys are on file with the BLM under right-of-way application CACA-49584.

Figure 1: Soda Mountain Solar Reserve Classification



SOURCE: ESRI 2012, CEC 2012, BLM 2012, DRECP 2011, and Panorama Environmental, Inc. 2012

Scale: 1:400,000

LEGEND

Proposed Project ROW

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0 5 10 Miles

PANORAMA ENVIRONMENTAL, INC.

Marxan Reserve Design for Soda Mountain Solar Project Site

The reserve design that resulted from Marxan Scenario 5 displayed the Project site as a green area of moderate biological sensitivity and therefore an area considered for conservation according to the DRECP. As stated by the BLM during the stakeholder meeting on July 25, 2012, this sensitivity was based largely upon land cover naturalness; species-specific biological goals and objectives were not developed or considered. Naturalness is an inaccurate proxy for species habitat and use. Species niche habitat and connectivity reflect landscape population dynamics that are independent of the naturalness of the habitat, for example. Areas of high "naturalness" may be unsuitable for species use for a variety of reasons: areas with few impervious surfaces may be unsuitable for niche habitat preferences, other factors may have contributed to habitat degradation (e.g., predators, invasive species), or an area may be outside of a species range due to natural or man-made landscape barriers (e.g., mountains, unvegetated playas, highways). Likewise, highly-disturbed habitats may be suitable to species use or contain important corridors, such as riparian areas for connecting wildlife populations. The reserve design does not provide targeted protection of the species that the DRECP is tasked with conserving because detailed, "ground-truthed" species and linkage analysis was not used in the design. Because the reserve design is based on naturalness of habitat, the reserve design reflects very large areas of moderate and high biological sensitivity due to the relatively few developed areas (impervious areas which would not be "natural") located within the DRECP Area. These areas may not be key habitat or linkage areas for species covered under the DRECP. Therefore, in the absence of detailed species analysis, the Marxan reserve design is unlikely to identify targeted areas for protection because it did not consider the species and uses that need to be protected.

Soda Mountain Solar Compared to Expert-Based Analysis Criteria

The DRECP used expert-based analysis to improve the reserve design output of Marxan, and, in this instance, to elevate the Project site's designation from "Moderate Biological Sensitivity" to "High Biological Sensitivity". Table 2, below, reevaluates the biological sensitivity of the Project site by comparing the expert-based criteria to Project-specific intensive habitat and species field survey results on file with BLM under CACA-49584. The analysis in Table 2 indicates that the Project site does not meet any of the criteria for high biological sensitivity.

Table 2: Soda Mountain Solar Biological Sensitivity Analysis	
Expert Evaluation Criteria	**Soda Mountain Solar Project Site**
Species habitat distribution and occurrences: concentrations, major populations, essential locations	The Project site does not have high concentrations or major populations of species. The Project site is characterized by sparse vegetation and low abundance and diversity of wildlife (URS 2009a). None of the DRECP-covered species are known to occur or were observed within the Project site during focused species surveys for desert tortoise, Mojave fringe-toed lizard, golden eagle, and bighorn sheep (URS 2009b; RMT 2010; RMT 2011).
Natural communities: representation and capture of rare and sensitive types	There are no rare or sensitive natural communities within the Soda Mountain Solar Project site. The Project site is completely dominated by Mojave creosote bush scrub, which is common throughout the desert (URS 2009a).
Large habitat blocks/core areas	The Project site lies within a relatively small valley that is separated geographically from larger landscape blocks or units. The Project site was not identified as a natural landscape block or core area within the Desert Connectivity Project (Penrod et al. 2012)
Habitat linkages and corridors	No habitat linkages were identified within the Project site by the Desert Connectivity Project (Penrod et al. 2012). An essential connectivity area was identified within the Project site (REF); however, the essential connectivity areas should be succeeded by the linkages identified in the Desert Connectivity Project (Spencer et al. 2010; Heim and Hietter 2012); *see* fn 2, above.
Physiographic and environmental representativeness: elevation gradients, slope, aspect, temperature, rainfall, including climate change	The Soda Mountain Solar Project site is contained within a valley where slopes range from 2-4%. The Project site is very uniform in elevation, gradient, rainfall, and temperature due to the overall small size of the Project site (4,400 acres) and the uniformity of site conditions. The habitat within the Project site is also uniform, exhibiting low vegetation and species diversity. The Project site does not include unique or distinct physiographic elements.
Ecological processes: landscapes supporting aeolian processes, alluvial and fluvial processes, geomorphological processes	There are no intermittent or perennial streams within the proposed Project site. There are numerous small ephemeral drainages within the Project site that are geomorphically stable and have not changed course over the last 50 years based upon analysis of historical aerial imagery. The ephemeral drainages and general area contain course grain sediments including gravels, cobbles, and sands. These course grain sediments are not subject to aeolian processes. While there are alluvial fans within the Project site, the alluvial processes are not an important source of sediment for downstream habitat. The Project site is geomorphically stable with coarse grain sediment, and would not be a significant source of sand or other materials for downstream areas (Wilson 2011).

Soda Mountain Solar Project Site Conditions Compared to Moderate Biological Sensitivity Description

The results of the Marxan reserve design indicated that the Project site should be designated as moderate biological sensitivity. The Project site does not meet the definition for moderate biological sensitivity as defined by the DRECP. The definition for moderate biological sensitivity includes areas that contain:

1) Biological resources that are moderately sensitive to perturbation;
2) Biological resources are less concentrated; or
3) Moderately sensitive biological resources.

1. Sensitivity of Biological Resources to Perturbation
The Project vicinity has been highly disturbed by past land use actions. The Project site is adjacent to and divided by the four- lane, divided Interstate-15 (I-15) highway. Other land uses directly adjacent to the Project site include:

- Rasor Road off-highway vehicle area
- Two transmission lines
- Power distribution line
- Telephone line
- Cellular tower
- Two fuel pipelines
- Underground fiber optic cable

Biological resources that are sensitive to perturbation would not be expected in the Project site due to the existing intensive land uses, particularly I-15 which exhibits nearly constant traffic as the primary thoroughfare between Las Vegas, Nevada and Los Angeles, California. Biological resources that would use the Project site would be limited to those that are habituated to human disturbance. The level of existing disturbance and on-going intensive uses of the Project site would not be suitable for biological resources that are moderately sensitive to perturbation.

2. Concentration of Biological Resources
Biological field studies were conducted for the Project site in 2009 and 2011. These studies included:

- Special status plants survey
- Focused desert tortoise survey
- Mojave fringe-toed lizard survey
- Golden eagle and bighorn sheep surveys
- Avian point count surveys
- Water resource investigation

Species diversity and abundance within the Project site is low and typical of areas containing sparse and uniform vegetation (URS 2009a). Neither vegetation nor wildlife occur within the Project site in high concentrations. The Project site does not support high concentrations of sensitive or other biological resources. The focused surveys for desert tortoise, Mojave fringe-toed lizard, golden eagle, and bighorn sheep did not identify presence of these species within the Project site (URS 2009b; RMT 2010; RMT 2011). Avian point count surveys were conducted in the fall and spring of 2009. A total of 629 birds were identified in the spring consisting of 22 common species. 210 birds were identified in the fall consisting of 23 common species. The most abundant species accounting for the majority of the birds observed in the Project site was the horned lark which is abundant through the Mojave Desert (URS 2010). There was no presence or concentration of DRECP covered species during Project site surveys.

3. Sensitive Biological Resources

The *DRECP Baseline Biology Report* (CEC 2012) identified modeled suitable habitat for both desert tortoise and bighorn sheep within the Project site. Suitable habitat was not identified for any other species covered under the DRECP. The suitable habitat models for desert tortoise and bighorn sheep used in the *DRECP Baseline Biology Report* inaccurately characterize and overestimate the habitat suitability within the Project site.

Protocol-level desert tortoise surveys were conducted for the Project site. No tortoise, burrows, or sign were identified within the study area during 100% coverage surveys conducted on 10-meter transects throughout the entire Study Area (URS 2009 and RMT 2010). No desert tortoise or sign were identified in any of the studies conducted in the study area (biology, geology, and cultural resources). The field surveys also indicate that conditions are not likely to support populations of desert tortoise because:

- The elevation of the area (less than 1,600 feet) is low for desert tortoise
- Vegetation is sparse with low diversity
- Soils are very rocky
- Habitat is fragmented by Interstate-15 (I-15)
- Disturbance from off-highway vehicle use and construction of two transmission lines, a cellular tower, a distribution line, a fiber optic cable, and two fuel pipelines

These conditions, combined with the field survey results for desert tortoise, indicate that few, if any, desert tortoise would be expected in the Project site (Heim and Hietter 2012).

Surveys for bighorn sheep were conducted in Project site and in the Soda Mountains in 2011 (RMT) and 2012 (Abella). No bighorn sheep were identified within the Project site and suitable habitat was not identified within the Project site during a habitat evaluation (URS 2009a). Bighorn sheep experts determined that the Project site does not provide habitat for bighorn sheep because:

- The Project site is flat and does not contain mountains (Kerr 2010)
- The Project site does not provide any water sources
- Bighorn sheep prefer to stay in mountainous areas which provide views of the surrounding areas and vantage points (Turner 2010)

These habitat conditions indicate that bighorn sheep would not occupy the Project site or stay in the Project site for long if they were to travel through the Project site (Heim and Hietter 2012).

The Project site does not contain sensitive biological resources including desert tortoise or bighorn sheep.

Appropriate Designation for Soda Mountain Solar Project Site
The Project site exhibits low biological sensitivity and should not be designated as a moderate biological sensitivity area. The Project site is highly affected by the presence of I-15 and the existing intensive land uses within the area. Wildlife use of the Project site is limited by the Soda Mountains to the north and south, the Baker sink to the east, and I-15 dividing the Project site. These barriers to wildlife movement and the increased incidence of mortality associated with the highway limit the potential for future wildlife use of the Project site. The Project site does not meet any of the criteria for biological sensitivity and should be categorized as unclassified land (i.e., "conservation unlikely"), particularly when its low biological sensitivity is considered in the context of current disturbance and the site's designation as a Section 368 transmission corridor and a (biologically ground-truthed) Renewable Energy Transmission Initiative (RETI) Competitive Renewable Energy Zone (CREZ). The reserve design should be modified to designate the Project site as unclassified land.

INAPPROPRIATE DESIGNATION OF SODA MOUNTAIN SOLAR PROJECT SITE AS A HIGH CONFLICT DEVELOPMENT FOCUS AREA

The Project site falls within the "Dinosaur" polygon that was designated as a "high conflict" Development Focus Area (DFA) on the basis of potential biological and public land use planning conflicts. The conflicts identified for the Dinosaur polygon do not apply to the Project site.

The following potential biological conflicts were identified(Figure 2):

- Bighorn sheep (29,326 acres of inter-mountain habitat; 7,390 acres of mountain habitat)
- Desert tortoise (17,583 acres of modeled habitat)
- Mojave fringe-toed lizard (29,821 acres of modeled habitat)
- Habitat linkages (16,117 acres of desert linkages)
- Total number of modeled DRECP Species: 10

The Project site, consisting of approximately 4,400 acres, is included in a larger potentially high conflict area. The majority of the Dinosaur polygon is located north of the Soda Mountains in an area that is geographically separate from and includes different habitat elements than the Project site. The conflicts identified for the Dinosaur polygon do not apply to the Project site. The Project site does not contain Mojave fringe-toed lizard modeled habitat, and, as shown in Figure 3, is not located within any habitat linkages (CEC 2012 and Penrod et al. 2012), or habitat identified by intensive surveys (URS 2009). The modeled results for designating desert tortoise and bighorn sheep habitat inaccurately characterize and overstate the habitat suitability of the Project site because focused surveys for desert tortoise and bighorn sheep are in direct conflict with the model results. The surveys found no desert tortoise on the Project site and a lack of suitable habitat for bighorn sheep. As explained above, the models of desert tortoise and bighorn sheep habitat suitability overstate the habitat quality of the Project site.

The model for desert tortoise habitat suitability identified moderately suitable habitat for desert tortoise (0.6 to 0.8) within the Project site, while focused surveys using USFWS protocols did not find any tortoise or sign within the Project site. Similarly, suitable habitat for bighorn sheep was predicted within the southern portion of the Project site, which is flat and does not contain areas that meet bighorn sheep habitat criteria and bighorn sheep have not been identified in the Project site. The difference between model output and field surveys can be explained through 1) errors in the model input, 2) human impacts to the habitat, and 3) expected errors in modeling. Errors in the data used to model suitable habitat include GIS data showing 0% presence of rocks in the Project site when field geology studies identified abundant rocks and cobbles, and the model resolution at $1km^2$ would miss details that could impact the habitat suitability. Human impacts to the Project site are abundant, including the presence of I-15, multiple linear projects, and OHV recreational use. None of these previous land use impacts were considered in the modeling and no field ground-truthing was conducted to verify the results. Finally, the models would be expected to be inaccurate in some locations such as a relatively small area like the Project site. The multi-state model of tortoise habitat suitability was conducted over 6 states including a very large variety of habitat circumstances allowing for a high degree of variability in tortoise predicted suitable habitat. The model of bighorn sheep habitat was only conducted over the DRECP Plan Area, but included a limited number of presence data points (32 points total) from which to model suitable habitat. The limited amount of data used in the model would be expected to result in less accurate results (Heim and Hietter 2012).[1]

The high-conflict designation of the Dinosaur polygon is also founded on assumptions regarding potential conflicts with public land use designations, specifically, its adjacency to:

- BLM Wilderness,

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[1] Due to the limited number of presence data points a relatively low threshold of 0.236 was used to classify suitable habitat for bighorn sheep.

- BLM Proposed Wilderness; and
- Proposed Feinstein Bill.

These potential conflicts identified for the Dinosaur polygon do not apply to the Project site. The Project site is not adjacent to BLM Wilderness. The Project site is adjacent to the Soda Mountain Wilderness Study Area (WSA), but the BLM determined the Soda Mountain WSA to be unsuitable for wilderness designation in 1990, stating:

> Known and potential mineral values, the need to keep the land available for full development of a designated utility corridor, and opportunities for motorized recreation, when coupled with the lack of outstanding or unique natural features in the WSA, are of greater importance than the area's value as wilderness. Designation of the area as wilderness would not contribute any additional unique or distinct features to the National Wilderness Preservation System (BLM 1990).

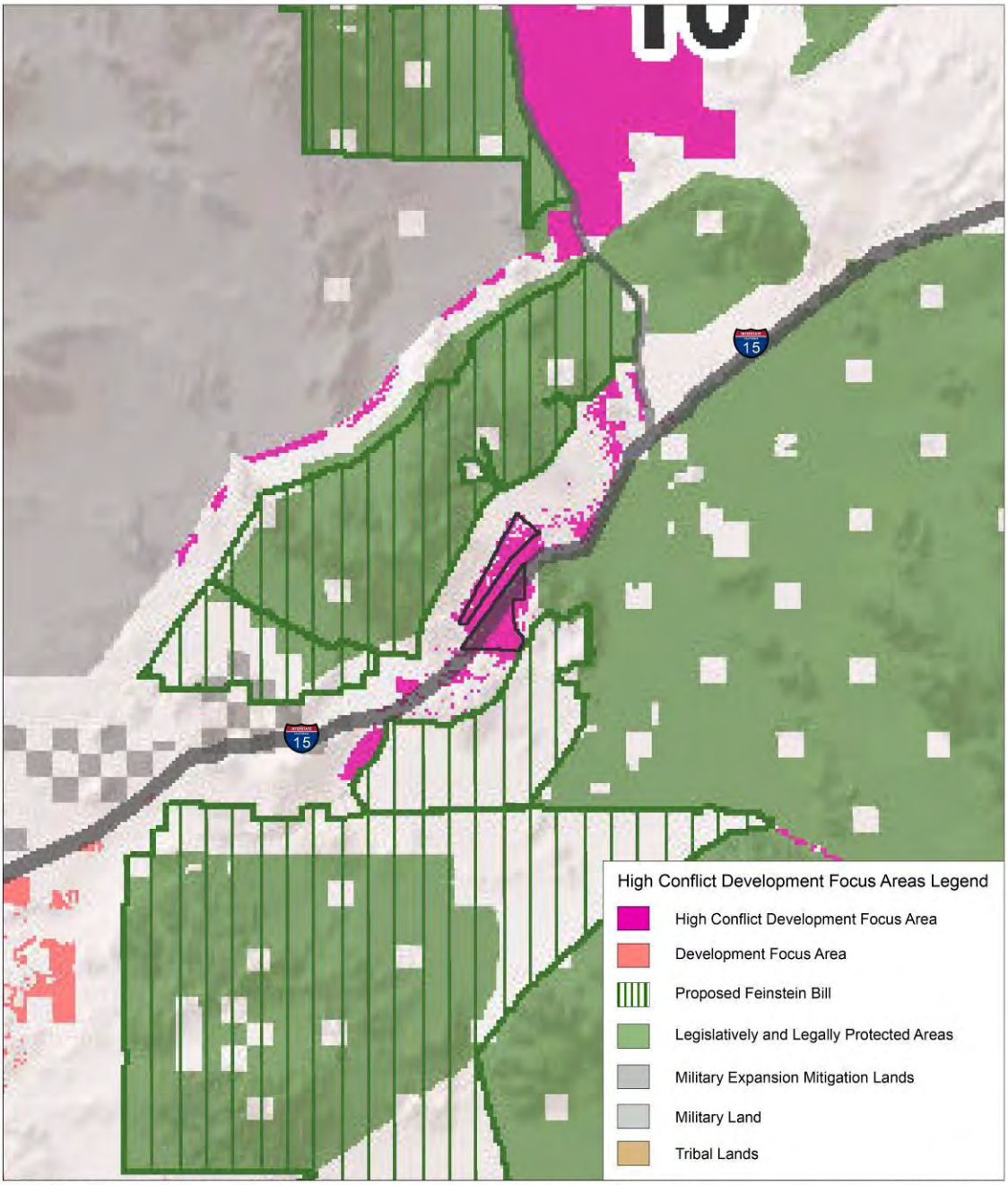
While Senator Feinstein's Desert Protection Act of 2011 does propose designation of a portion of the Soda Mountain WSA as wilderness, the following express provisions of Section 1502 of the bill resolve any potential conflicts posed by renewable energy development of the Project site:

- The bill does not create a protective perimeter or buffer zone around the wilderness areas it creates (Section 1502(a)(1)).
- The bill does not require additional regulation of activities on land outside the boundary of the wilderness areas it creates (Section 1502(a)(3)).
- Perception of noise from or views of activities outside the wilderness areas created by the bill cannot be grounds for prohibiting or restricting such uses (Section 1502(a)(2)(A)).
- The impacts of a renewable energy project on a wilderness area created by the bill must be assessed based on the status of the proposed wilderness lands before their designation as wilderness if the renewable energy project initiates NEPA review prior to December 31, 2013 (Section 1502(a)(2)(B)).

The Project will initiate NEPA review prior to December 31, 2013.

In short, the High Conflict Area map needs to be revised to exclude the Project site because the potential biological and public land use conflicts ascribed to the Dinosaur polygon do not apply to the Project site.

Figure 2: Soda Mountain Solar "High Conflict Areas"



SOURCE: ESRI 2012, CEC 2012, BLM 2012, DRECP 2011, and Panorama Environmental, Inc. 2012

Scale: 1:400,000

LEGEND

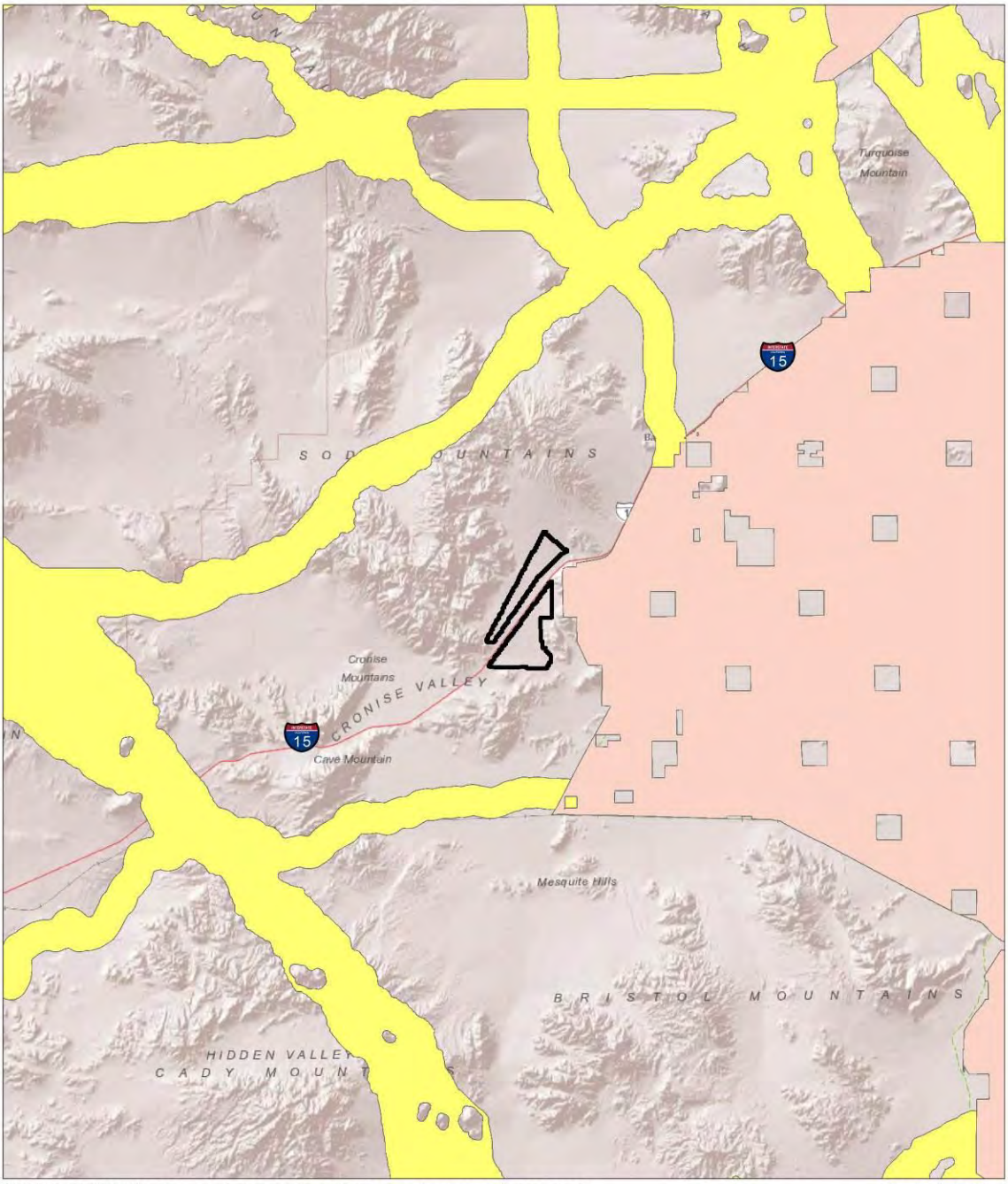
Proposed Project ROW

N

0 5 10 Miles

PANORAMA ENVIRONMENTAL, INC.

Figure 3: Soda Mountain Solar Connectivity Areas (Penrod et al. 2012)



SOURCE: ESRI 2012, Penrod, K. et al. 2012, and Panorama Environmental, Inc. 2012

Scale: 1:400,000

LEGEND

Proposed Project ROW

Landscape Blocks

Least Cost Unions

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0 5 10 Miles

PANORAMA ENVIRONMENTAL, INC.

DFA STATUS OF THE PROJECT SITE ACROSS DRAFT DRECP ALTERNATIVES

The 4,400-acre Project site is not located within a DFA in any of the five draft DRECP alternatives, although it is depicted as a "variance" area in Alterative 1. The Project site warrants a DFA designation within the DRECP, across all alternatives. The site-specific species data for the Project site demonstrate limited biological value for special status species, both as habitat and as a connectivity corridor. Anthropogenic disturbance of the Project site is abundant, including the presence of I-15, multiple linear projects, OHV recreational use, and the former Arrowhead Highway. Located within a Section 368 energy corridor and RETI CREZ, the Project site already has been identified as suitable for substantial infrastructure development and is one of the primary transmission and transportation routes into California. Moreover, the BLM has concurred that development of the Project would not conflict with the transmission objectives of the Section 368 corridor (BLM 2009). LADWP's system impact study indicates that its existing transmission line through the Project site has sufficient capacity to accommodate 350 MW of renewable generation without the need for upgrading. Because of its proximity to existing roads and transmission infrastructure, no generation intertie transmission line construction is necessary and access road development would be limited to internal access. As explained above, Senator Feinstein's proposed Desert Protection Act of 2011 expressly avoids impeding renewable development of the Project site, and such development would not conflict with BLM's recommendation against designating the adjacent Soda Mountain WSA as wilderness. Finally, the National Park Service has confirmed its willingness to work with Soda Mountain Solar, LLC to address concerns regarding potential impacts to the interior of the Mojave National Preserve. All of the above information is on record with the BLM under ROW CACA-49584.

The Project site exhibits fewer siting constraints than most sites previously approved or currently under consideration by the BLM for solar development in California. We request that the preparers of the DRECP and its associated NEPA and CEQA reviews draw from the wealth of existing Project-specific data to substantiate a DFA designation for the Project site across all alternatives, rather than rely solely – and, in this particular instance, potentially arbitrarily - on the development assumptions proposed by the Center for Energy Efficiency and Renewable Technologies.

PENDING PROJECTS ON BLM-ADMINISTERED LANDS

After much negotiation, leaders of the renewable energy industry and the environmental community have jointly supported BLM's proposed decision to exempt from the PEIS all BLM solar energy right-of-way applications filed within Solar Energy Zones prior to June 30, 2009 and, within "variance" areas, prior to October 28, 2011 (Abengoa Solar, et al. 2012). Assuming the pending projects exemption is carried forward through the Record of Decision for the PEIS, we respectfully urge the BLM to continue to honor the concept if and when it amends its land use plans to factor in the DRECP once it is adopted. We also strongly recommend that the

DRECP design incorporate BLM's pending projects exemption into its conservation assumptions by (i) expressly stating that the DRECP's conservation assumptions do not apply to BLM-approved projects or PEIS "pending project" sites unless the approved project is cancelled or the pending project application is withdrawn or rejected; and (ii) overlaying BLM-approved projects and PEIS "pending project" boundaries on relevant DRECP maps with a legend item summarizing the concept. Please note that both CEQA and NEPA will require the cumulative analyses of the DRECP's EIR/EIS to account for the pending projects exemption.

The pending projects exemption is the fulcrum upon which many compromises were made by the environmental community on one side and the solar industry on the other. It would be poor policy if the DRECP were to upset such a hard-won (and well-supported) collaborative balance.

RECOMMENDATIONS

The following modifications to the DRECP reserve design, high conflict areas, and draft alternatives are recommended for the Soda Mountain Solar Project site:

1. The categorization for the Soda Mountain Solar Project site should be changed; from "High Biological Sensitivity – Public" to "Unclassified Land";
2. The high conflict DFA designation should be removed from the Project site;
3. The Project site should be identified as a DFA across all development alternatives; and
4. The PEIS "pending projects" exemption should be incorporated into the DRECP design.

Soda Mountain Solar, LLC, appreciates the opportunity to comment on the meeting materials. These comments seek to improve the reserve design process and to encourage the adoption of a plan that reflects the overall purpose of the DRECP: protection of covered species and streamlining of permitting for renewable energy projects.

Sincerely,

Adriane Wodey
Soda Mountain Solar, LLC

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Soda Mountain Solar, LLC
5275 Westview Drive
Frederick, MD 21703

July 24, 2012

California Energy Commission
Dockets Office, MS-4
Docket No. 09-RENEW EO-01
1516 Ninth Street
Sacramento, CA 95814-5512
docket@energy.ca.gov

RE: Comments on DRECP Baseline Biology Report

Dear Sir/Madam:

Soda Mountain Solar, LLC (SMS) is the developer of the Soda Mountain Solar Project (the Project). The Project is a proposed 350 megawatt photovoltaic solar electric power generating facility located approximately six miles southwest of Baker, California, along Interstate 15, in San Bernardino County. The Project would be located within a 4,400 acre right-of-way on federal land administered by the U.S. Bureau of Land Management. The Soda Mountain Project area is shown in Figure 1 at the end of this letter.

SMS has reviewed the *Draft Desert Renewable Energy Conservation Plan (DRECP) Baseline Biology Report* (CEC 2012) and compared its habitat suitability results for desert tortoise and bighorn sheep with results of field studies conducted within the Soda Mountain Solar project area.[1] Our review also identified weaknesses in the methods used in the *Draft DRECP Baseline Biology Report*. The full analysis, including evaluation of the underlying models applied in the *Draft DRECP Baseline Biology Report*, is provided in the enclosed document, "Analysis of Habitat Suitability and Connectivity in the Soda Mountain Area, San Bernardino County, California" (Heim and Hietter 2012). The findings and recommendations of this analysis as they specifically apply to the *Draft DRECP Baseline Biology Report* and the Soda Mountain Solar Project site are

[1] As part of the right-of-way application process, SMS has completed detailed environmental studies within the proposed Project area, including: desert tortoise survey; golden eagle and bighorn sheep survey; special-status plant survey; Mojave fringe-toed lizard survey; avian surveys; habitat assessment; water resource investigation and delineation; hydrologic and groundwater evaluation; geologic characterization; and a percolation and scour analysis. The results of each of these surveys are on file with the BLM.

provided below. Our letter concludes with several recommendations for the revision of the *Draft DRECP Baseline Biology Report* as it applies to the Soda Mountain Solar Project site.

Recommendations

The *Draft DRECP Baseline Biology Report* should be revised as described below.

1) **Section 3: Figure 3-4.** The Soda Mountain Solar Project area should not be designated as a connectivity corridor in the Baseline Biology Report because the species-specific analysis conducted by the California Desert Connectivity Project did not identify any linkages within the Soda Mountain Solar area.

The polygons of essential connectivity areas from the California Essential Connectivity Project should be removed and replaced with the more detailed linkage network developed by the California Desert Connectivity Project, where the two efforts overlap. This replacement is recommended in *California Essential Habitat Connectivity Project: A Strategy for Conserving a Connected California* (Spencer et al. 2010):

> *"Essential Connectivity Areas are placeholder polygons that can inform land-planning efforts, but that should eventually be replaced by more detailed Linkage Designs, developed at finer resolution based on the needs of particular species and ecological processes. It is important to recognize that even areas outside of Natural Landscape Blocks and Essential Connectivity Areas support important ecological values that should not be "written off" as lacking conservation value. Furthermore, because the Essential Habitat Connectivity Map was created at the statewide scale, based on available statewide data layers, and ignored Natural Landscape Blocks smaller than 2,000 acres, it has errors of omission that should be addressed at regional and local scales".*

The inclusion of Essential Connectivity Areas where detailed regional scale analyses are available is inconsistent with the methods and recommendations of the California Essential Connectivity Project. Figure 3-4 of the Baseline Biology Report should be revised by removing the Essential Connectivity Areas from the map where finer resolution linkages, such as the California Desert Connectivity Project, are available. The Soda Mountain Solar proposed project area should not be designated as a connectivity corridor in the Baseline Biology Report. The species-specific analysis conducted by the California Desert Connectivity Project did not identify any linkages within the Soda Mountain Solar area.

2) **Appendix B - PRELIMINARY DRAFT March 2012, DRECP Species Statistical Model: Desert Bighorn Sheep.** The Preliminary Draft statistical model for desert bighorn sheep should be revised to include additional data. The model was constructed using 32 presence data points, none of which are located within the Soda Mountains. There is a population of bighorn sheep that was surveyed in the south Soda Mountains by California Department of Fish and Game (CDFG 2012). These data should be incorporated into the model to assist in model refinement. There are seven locations where bighorn sheep were identified in the CDFG surveys. In addition, the model should be refined through ground-truthing. Low-lying areas and areas next

to highways, such as those in the southern portion of the Soda Mountain Solar Project area, should not be included in the model because they do not meet known conditions for suitable habitat, as confirmed by bighorn sheep survey work performed for the Soda Mountain Solar Project. Further documentation of methods should also be provided. The method should state which specific data sources listed in Appendix C were used in the final model, and the resolution of the model.

3) **Appendix B – PRELIMINARY DRAFT March 2012, DRECP Species Model: Desert Tortoise.** The Preliminary Draft species model for desert tortoise identifies suitable habitat throughout the entire valley between the Soda Mountains. This identification of suitable habitat is inconsistent with the method used for the species model (e.g., OHV areas and areas of disturbance were to be removed from suitable habitat areas) and it is inconsistent with field studies of habitat suitability. The OHV area to the south and east of the Project area is identified as suitable habitat for desert tortoise. Similarly, the I-15 highway and corridor, which are highly disturbed, are identified as suitable habitat. The enclosed study provides an evaluation of habitat suitability for desert tortoise within the Project area. The habitat is not likely to sustain a population of desert tortoise due to the limited area between the mountains, high level of human disturbance (I-15 highway and OHV area), low elevation, abundance of rocks and cobbles, and sparse vegetation cover with low vegetative diversity. The model should be updated to reflect a lower quality of habitat within the Project area.

4) The DRECP should be revised to include the Soda Mountain Study Area as a solar development area in draft integrated alternatives 2, 3, and 5. Alternative 2, "Geographically Balanced/Transmission Aligned Alternative," state that development should be aligned with the existing and planned transmission network. The C is located in a BLM utility corridor that currently includes two transmission lines and a distribution line.

Alternative 3, "West Mojave and Tribal Sensitivity Emphasis," is designed to emphasize development in the West Mojave and to exclude projects in areas considered by multiple tribes to have high sensitivity. The Soda Mountain Study Area is located in the West Mojave area and no tribal conflicts have been identified after initial consultation by BLM.

Alternative 5, "Increase Geographic and Technology Flexibility," seems to be the alternative with the highest allowed resource conflicts and the greatest flexibility. The Soda Mountain Study Area has limited resource conflicts and is consistent with Alternative 5.

Conclusion

Based on the enclosed "Analysis of Habitat Suitability and Connectivity in the Soda Mountain Area, San Bernardino County, California", we recommend revising the *DRECP Baseline Biology Report* as it applies to the Soda Mountain Solar Project site as follows:

- Remove the connectivity corridor designation from Figure 3-4 at the Soda Mountain project area;

- Remove the suitable habitat designation in the Soda Mountain project area from the DRECP Statistical Model for Desert Bighorn Sheep; and
- Remove the suitable habitat designation in the Soda Mountain Solar Project area from the DRECP Species Model for Desert Tortoise.

A process should also be designed for updating the Baseline Biology Report to incorporate detailed species-specific survey data as it becomes available. The *Baseline Biology Report* relies heavily on the use of models to develop information. Models are representations of reality based upon assumptions. Models are limited in their ability to characterize real world conditions and should be updated by field data like those generated for the Soda Mountain Solar Project. The enclosed analysis is essentially a case study demonstrating this point.

The Soda Mountain Study Area has been shown to be an area with limited resource conflicts. It should therefore be included in the DRECP as a solar development area in draft integrated alternatives 2, 3, and 5.

Please review the enclosed study upon which we base our recommendations. We believe it will help to improve the accuracy of the DRECP particularly as it applies to the Soda Mountain Solar Project site. We appreciate the opportunity to review and provide comments.

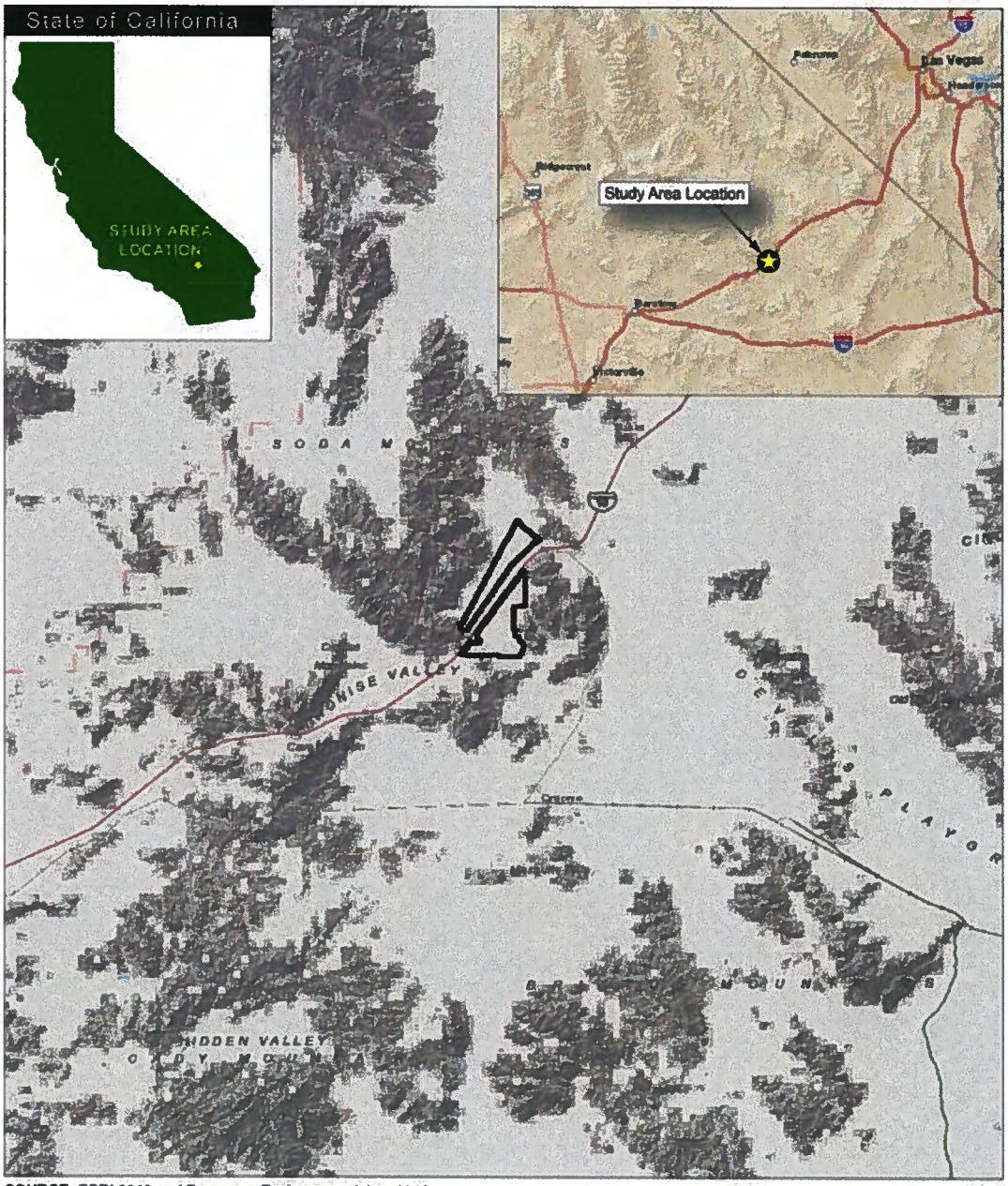
Sincerely,

Adriane E. Wodey

Adriane E. Wodey
Manager
Soda Mountain Solar, LLC

Enclosure: "Analysis of Habitat Suitability and Connectivity in the Soda Mountain Area, San Bernardino County, California"

Figure 1



LEGEND

Study Area

Miles
0 5 10

PANORAMA ENVIRONMENTAL, INC.

Analysis of Habitat Suitability and Connectivity in the Soda Mountain Area, San Bernardino County, California

Susanne Heim and Laurie Hietter

July 2012

PANORAMA ENVIRONMENTAL, INC.

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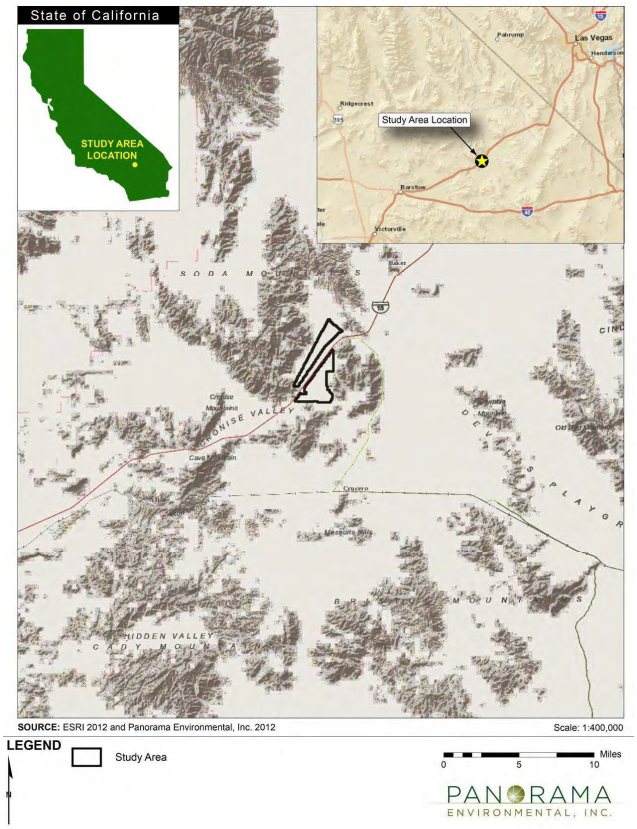
EXECUTIVE SUMMARY

This study was commissioned by Soda Mountain Solar, LLC to assess habitat suitability and connectivity for desert tortoise (*Gopherus agassizii*) and desert bighorn sheep (*Ovis canadensis nelsoni*) in the valley between the north and south Soda Mountains, San Bernardino County, California, which is referred to as the Soda Mountain Study Area. This study provides an analysis of the accuracy of habitat suitability and connectivity model predictions for an approximately 7,000 acre area within the Mojave Desert. Habitat suitability and connectivity models are being used by regulatory agencies to define areas for habitat conservation and development. The accuracy and limitations of model predictions are important considerations for decision-makers when relying on habitat suitability and connectivity models for land use decisions.



Five studies of desert tortoise and bighorn sheep habitat and connectivity were reviewed. The results of these studies were compared with the results of field surveys performed in the Soda Mountain Study area, which is in the valley located between the north and south Soda Mountains. The comparison provides insight into the accuracy of models to correctly predict habitat and species occurrence. The comparison revealed that habitat suitability models have inherent weaknesses and should not substitute for field studies, particularly where detailed field survey data are available.

STUDIES REVIEWED

Habitat and Connectivity Models

Several studies have been conducted that used models to identify suitable habitat for desert tortoise and bighorn sheep, and to identify potential wildlife connectivity corridors. Studies reviewed in this paper include:

1. *Modeling Habitat of the Desert Tortoise (Gopherus agassizii) in the Mojave and Colorado Deserts, California, Nevada, Utah, and Arizona* (Nussear et al. 2009)

2. "Making Molehills Out of Mountains: Landscape Genetics of the Mojave Desert Tortoise" (Hagerty et al. 2010)
3. *California Essential Habitat Connectivity Project: A Strategy for Conserving a Connected California* (Spencer et al. 2010)
4. *A Linkage Network for the California Deserts* (Penrod et al. 2012)
5. *Draft Desert Renewable Energy Conservation Plan (DRECP) Baseline Biology Report* (California Energy Commission [CEC] 2012)

Field Studies

Field studies were performed in the Soda Mountain Study Area between 2009 and 2012. Field studies that were compared with the habitat model predictions include:

- Desert tortoise survey, 100% coverage (2009)
- Bighorn sheep surveys, aerial and ground-based (2011 and 2012)
- Special-status plant surveys (2009)
- Avian point count surveys (2009)
- Water resource investigation (2009)
- Geology studies (2010)

DESERT TORTOISE HABITAT

Desert tortoise habitat suitability models predict moderately suitable habitat (0.6 to 0.8 predicted probability) for desert tortoise within the Study Area (Nussear et al 2009) and the area is defined as suitable habitat (CEC 2012). The model results differ from the field survey results, which identified no tortoise, burrows, or sign within the study area during 100% coverage surveys conducted on 10-meter transects throughout the entire Study Area. No desert tortoise or sign were identified in any of the studies conducted in the study area (biology, geology, and cultural resources). The field surveys also indicate that conditions are not likely to support populations of desert tortoise because:

- The elevation of the area (less than 1,600 feet) is low for desert tortoise
- Vegetation is sparse with low diversity
- Soils are very rocky
- Habitat is fragmented by Interstate-15 (I-15)
- Disturbance from off-highway vehicle use and construction of two transmission lines, a distribution line, a fiber optic cable, and two fuel pipelines)

These conditions, combined with the field survey results for desert tortoise, indicate that few, if any, desert tortoise would be expected in the Study Area.

DESERT TORTOISE CONNECTIVITY

The Study Area is not identified within a modeled desert tortoise connectivity corridor (CEC 2012), and the Baker sink, located east of the Study Area, is identified as a barrier to tortoise movement (Hagerty et al 2010). The modeled lack of desert tortoise connectivity within the area

is consistent with the presence of 1) mountains surrounding the Study Area, 2) the Baker sink to the east of the Study Area, and 3) highway I-15 bisecting the Study Area. These landscape features individually and cumulatively inhibit tortoise movement through the Study Area.

BIGHORN SHEEP HABITAT

The model of suitable habitat for bighorn sheep identified suitable habitat within the southern portion of the Study Area (CEC 2012). The model results differ from field survey and habitat assessment results, which indicate the area is not suitable habitat for bighorn sheep. The flat and open terrain, absence of a water source, and presence of I-15 all indicate that if bighorn sheep were to use the habitat, the use would be temporary and they would not be expected to stay in the valley for long. The adjacent south Soda Mountains are considered suitable habitat and the herds have been identified as using the east slope of the mountains, which is closer to the water source at Zzyzx Spring,

BIGHORN SHEEP CONNECTIVITY

The model of bighorn sheep connectivity does not identify linkage areas within the Study Area (Penrod et al. 2012). This conclusion is consistent with the field results, which identified a population of bighorn sheep in the south Soda Mountains, but no bighorn sheep to the north. Prior to I-15, the area may have been used for connectivity between the north and south Soda Mountains; however, the presence of I-15 reduces the potential for connectivity in the area. Individual bighorn sheep may cross through the Study Area and attempt to cross I-15, but populations of bighorn sheep would not be expected to use the area as a connectivity corridor.

CONCLUSION

Models of habitat suitability and connectivity have limitations that can result in inaccurate predictions of species habitat and connectivity. The primary limitations of these models include:

1) Errors in the model input that would cause errors in the model predictions,
2) Human disturbance, which has fragmented the habitat or reduced the value of habitat for species, is not considered, and
3) Model errors due to application to a small area.

These limitations should be considered when using the models to make conservation or land use decisions. Where field data are available, the data should be incorporated into the decision-making process.

ABSTRACT

Species habitat and connectivity models are frequently used to support land management decisions. While modeling provides an important tool for decision makers, there are limitations of habitat suitability and connectivity models that land use managers and decision makers should be aware of. Models of desert tortoise (*Gopherus agassizii*) and bighorn sheep (*Ovis canadensis nelsoni*) habitat suitability and connectivity are evaluated in this case study. The model predictions are compared to field study results of desert tortoise and bighorn sheep presence and use within an approximately 2,800-hectare (7,000-acre) area of the Mojave Desert along the Interstate-15 corridor between the North and South Soda Mountains. The comparison of model predictions to field conditions is used to evaluate the strength of each model. This analysis identifies limitations that are common to habitat and species distribution models. Model results can be inaccurate and should only be used in the absence of, rather than as a substitute for, field survey results.

PEER REVIEW

We would like to thank the following experts for their contributions and review of this paper:

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1 INTRODUCTION

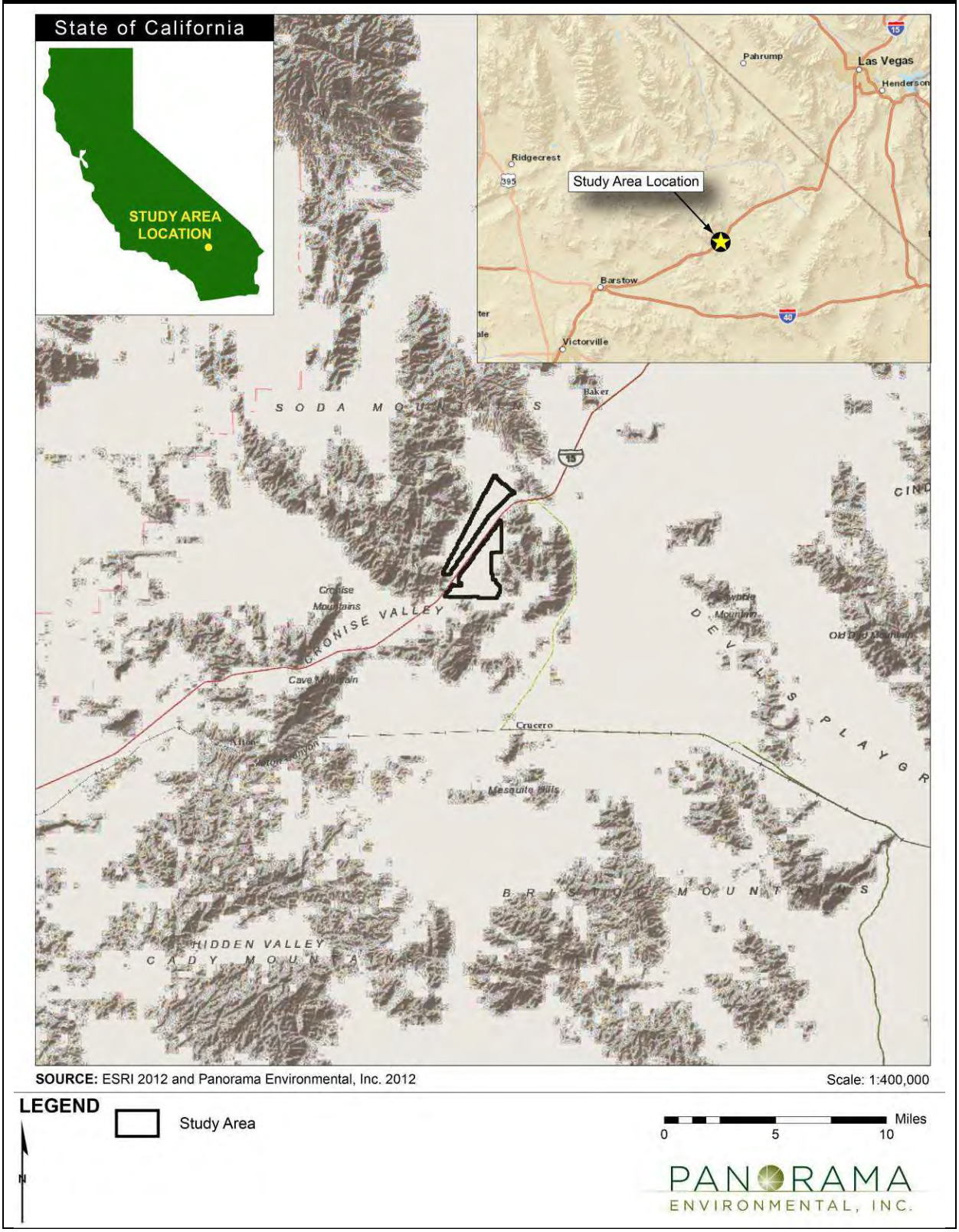
Recent studies of habitat suitability and linkage corridors in the Mojave Desert have used habitat modeling to predict suitability of species habitat and connectivity over multi-state, state, and regional geographic areas. The model results are being used to guide land use decisions related to development and conservation. This case study presents an analysis of the effectiveness of habitat models developed to predict habitat suitability at large geographic scales for use in estimating suitable habitat at a much smaller scale (4,000 hectares or less).

The primary method for determining habitat suitability and connectivity over large geographic areas is through the use of stochastic models. A stochastic modeling approach applies computer processing power to large data sets to estimate a probability distribution. This probability distribution is used to determine habitat suitability for areas within the model. Models of habitat for the desert tortoise (*Gopherus agassizii)*, bighorn sheep (*Ovis canadensis nelsoni*), and wildlife connectivity are reviewed in this case study. Field studies are reviewed to analyze model accuracy for a 2,800-hectare (7,000 acre) area.

1.1 STUDY AREA

The focus area for this study is an approximately 2,800-hectare (7,000-acre) area located along the Interstate 15 (I-15) corridor between the north and south Soda Mountains, referred to here as the Soda Mountain Study Area, San Bernardino, California (Figure 1).The Soda Mountain Study Area lies south and west of the town of Baker, California within an intermontane desert valley composed of alluvial fan deposits and surrounded by the Soda Mountains. Most of the Soda Mountains are northwest of the Study Area and reach an elevation of approximately 1,100 meters. Lower mountains to the south and east of the Study Area form a discontinuous border reaching elevations of approximately 730 meters. Elevations in the Study Area range from approximately 470 meters in the north to 380 meters in the southeast. The Baker sink, a relic of one of the drainages feeding the Pleistocene Lake Manley in Death Valley, is located east of the Study Area and the south Soda Mountains. Average annual precipitation in the Study Area is approximately 4.1 inches (Prism Climate Group 2012).

Figure 1: Soda Mountain Study Area



2 BACKGROUND

2.1 HABITAT

2.1.1 Desert Tortoise

Mojave desert tortoises are known to occur from below sea level to an elevation of 2,225 meters (U.S. Fish and Wildlife Service [USFWS] 2011). Desert tortoises occur most commonly on gently sloping terrain (bajadas) consisting of sand- and gravel-rich soils where there is sparse cover of low-growing shrubs. Soils normally must be friable enough for digging burrows, yet firm enough so that burrows do not collapse (USFWS 2011). Tortoises generally cannot construct burrows in rocky soils or shallow bedrock (USFWS 2011). Typical habitat for the desert tortoise in the Mojave Desert has been characterized as creosote bush scrub between 600 meters and 1,800 meters, where precipitation ranges from 2 to 8 inches, and vegetation diversity and production is high (Nussear et al. 2009). Desert tortoises are known to occupy large home ranges.

Threats to desert tortoise populations identified in the Desert Tortoise Recovery Plan (USFWS 1994) are numerous and include:

6. Human contact and mortality, including vehicle collisions and collection of tortoises
7. Predation, primarily from raven, but also from feral dogs, coyotes, mountain lions and kit fox
8. Disease
9. Habitat destruction, degradation, and fragmentation resulting from grazing, land development, off-highway vehicles (OHVs), wildfire, and road construction

2.1.2 Bighorn Sheep

Bighorn sheep populations are found in steep, rocky, mountainous areas, commonly on slopes of 10 percent or greater (URS 2009a). Sixty-nine discrete population groups have been documented within the Mojave Desert (Bare et al. 2009). Steep, rugged terrain is the primary habitat used by bighorn sheep, particularly females and lambs, because it affords good protection from predators. Alluvial fans and washes on gently sloping terrains are also used to obtain forage and water. The availability of water is an important habitat element for bighorn sheep, particularly between May and October, when reproduction occurs (California Energy Commission [CEC] 2012).

2.1.3 Habitat Connectivity

The pace of development in the western deserts has increased with the institution of renewable portfolio standards in California, Nevada, and Arizona and federal goals for renewable energy development (CDFG et al. 2010). Wildlife corridors are increasingly impacted by land development and linear transportation features, such as highways, which can bisect and abate

migration routes resulting in segregation and isolation of wildlife populations. Engineered features, such as under-highway culverts, can provide the means to cross roads safely and allow populations to connect across highways. Habitat connectivity studies are needed to identify and preserve key habitat corridors that support movement of wildlife populations and gene flow. Maintaining key corridors for wildlife dispersal is also important under changing climate conditions where wildlife populations may need to move to new habitat areas as optimal habitat is sought.

2.2 MODELS OF HABITAT SUITABILITY AND CONNECTIVITY

Several recent studies of habitat suitability and wildlife connectivity involving the California deserts have been performed to support protection of rare or threatened species, identify key areas of the desert that include the highest value habitat, and identify areas that are used by species for movement and migration. The studies analyzed in this paper are:

1. *Modeling Habitat of the Desert Tortoise (Gopherus agassizii) in the Mojave and Colorado Deserts, California, Nevada, Utah, and Arizona* (Nussear et al. 2009)
2. "Making Molehills Out of Mountains: Landscape Genetics of the Mojave Desert Tortoise" (Hagerty et al. 2010)
3. *California Essential Habitat Connectivity Project: A Strategy for Conserving a Connected California* (Spencer et al. 2010)
4. *A Linkage Network for the California Deserts* (Penrod et al. 2012)
5. *Draft Desert Renewable Energy Conservation Plan (DRECP) Baseline Biology Report* (CEC 2012)

The regional, state, and multi-state geographic scale of these studies required the use of stochastic models with large data sets to determine the potential for suitable habitat and wildlife connectivity. The purpose, methods, limitations, and results of each study are summarized.

2.2.1 Model Methods and Limitations

1. *Modeling Habitat of the Desert Tortoise (Gopherus agassizii) in the Mojave and Colorado Deserts, California, Nevada, Utah, and Arizona* (Nussear et al. 2009)

Purpose

The US Geological Survey (USGS) modeled desert tortoise habitat to evaluate the effectiveness of management efforts for the desert tortoise outlined in the 1994 USFWS Recovery Plan (Nussear et al. 2009). The USGS model was intended for use in conservation program design and to evaluate changes in species distributions. The USGS model was developed to support preparation of the Revised Recovery Plan published by USFWS in 2011.

Approach and Methods

Desert tortoise habitat suitability was modeled using the Maximum Entropy Model (Maxent) (Phillips et al. 2006). The area modeled included the desert region of California, Nevada, Utah

and Arizona. Maxent allows for modeling of species distribution using presence-only data. The Maxent model is appropriate for species where there is limited absence data, or where absence is difficult to verify due to the habits of the species. The model uses presence data to define an expected probability of suitable habitat on the basis of past observances of presence of the species.

Habitat suitability was modeled using 16 data layers in a geographic information system (GIS). The model used continuous independent variables. The GIS data were obtained from various data sources and included:

1. Mean dry season precipitation for 30-year normal period
2. Dry season precipitation, spatially distributed coefficient of variation (CV)
3. Mean wet season precipitation for 30-year normal period
4. Wet season precipitation, spatially distributed coefficient of variation (CV)
5. Elevation
10. Slope
11. Northness (aspect)
12. Eastness (aspect)
13. Average surface roughness
14. Percent smooth
15. Percent rough
16. Average soil bulk density
17. Depth to bedrock
18. Average percentage of rocks >254 millimeters B-axis diameter
19. Perennial plant cover
20. Annual plant cover

A total of 15,311 presence data points representing desert tortoise presence or occurrence were aggregated from desert tortoise surveys performed from 1970 through 2008. Presence was determined from evidence of live tortoises, carcasses, burrows, scat, or other sign. Absence data were randomly selected from model grid cells where there were no desert tortoise observances during desert tortoise surveys.

The model was developed at a resolution of 1 square kilometer (km^2) (i.e., grid size). The model was tested using area under the curve (AUC)[1] to estimate model sensitivity and specificity. Due

[1] Area under the curve (AUC) is used to test model performance by plotting sensitivity (true positive rate) on the y-axis, and specificity (false positive rate) on the x-axis (Nussear et al. 2009). The AUC characterizes the performance of the model, and is summarized by a single number ranging from 0 to 1, where 1 indicates perfect model performance, 0.5 indicates the equivalent of a random guess, and less than 0.5 indicates performance worse than random (Nussear et al. 2009). In general, AUC scores between 0.7 and 0.8 are considered fair to good, and scores above 0.9 are considered excellent (Swets 1988).

to the lack of absence data, AUC tested the model performance against pseudo-absence data rather than true absence data (Phillips et al. 2006). Pearson's correlation coefficient was calculated as the correlation between the predicted model values and 1) test presence data points where tortoises were observed, and 2) the random background points where no tortoises were observed. Pearson's correlation coefficient was used as a more direct measure of how the model predictions vary from observations. Several variables were not predictive of suitable habitat including eastness, northness, wet season precipitation CV, dry season precipitation CV, percent roughness, and slope. These variables were eliminated from the final model.

The model output of habitat potential was binned into categories ranging from 0 to 1 at increments of 0.1, where 0 represents areas where the habitat potential approaches 0 percent habitable, and 1 represents areas where the habitat potential approaches 100 percent habitable. The categories were mapped for each 1-km^2 grid cell to represent percent potential habitat.

Limitations

Limitations of the method used to predict habitat suitability include:

1. Presence-only-based modeling is commonly subject to sampling bias and spatial autocorrelation (Phillips et al. 2006).
2. Errors may be present in the data used for the model. No data were collected for this study, so it is dependent on the accuracy of the various data sources (Nussear et al. 2009).
3. There may be variables that are important to tortoise habitat suitability that were not accounted for in the model (e.g., soil type, vegetation diversity) (Phillips et al. 2006).
4. The model output was not corrected to remove areas where desert tortoises have historically not been found to inhabit, areas that are not inhabited due to biotic interactions, or areas of anthropogenic effects such as habitat destruction, fragmentation, or natural disturbances (Nussear et al. 2009; Phillips et al. 2006).
5. The approach predicts suitability statistically rather than mechanistically as in Kearney and Porter (2009). Species presence and absence in sampling data are assumed to reveal habitat suitability, but may actually reflect stochastic population dispersion (Tracy 2012).

2. "Making Molehills Out of Mountains: Landscape Genetics of the Mojave Desert Tortoise" (Hagerty et al. 2010)

Purpose

Hagerty et al. (2010) evaluated the impacts of habitat fragmentation on desert tortoise genetic diversity. Genetic testing was used to identify landscape features that could facilitate or impede tortoise movement. This study identifies barriers and limitations to tortoise movement to provide a better understanding of how landscape features can impact desert tortoise genetic diversity. Maintaining genetic diversity is particularly important for rare species whose

continued existence can be threatened by disease. An improved understanding of landscape genetics is needed to identify methods to maintain or tortoise genetic diversity and support species recovery efforts.

Approach and Methods

Habitat connectivity for desert tortoise was modeled and used in combination with genetic data to determine the factors that influence tortoise gene flow. DNA was extracted from blood collected from 744 desert tortoises in 25 different geographic areas within California, Nevada, Utah and Arizona deserts. Genetic distance measures or the genetic divergence within the desert tortoise population were calculated for the 25 sampling locations. Euclidian distances (geographic distances) were also calculated as a straight-line measure between the center points of the 25 areas using GIS tools.

A habitat suitability model was developed using Maxent. The model was similar to the model developed by Nussear et al. (2009) and used the same tortoise presence data and 12 of the 16 data layers in its construction. Three separate models were constructed using the outputs of a habitat suitability model:

1. Least-cost path
2. Isolation by resistance
3. Isolation by barriers

Two models of landscape friction, least-cost path and isolation by resistance, were developed using a resistance surface[2] where cells of lower potential habitat would reduce the ability for desert tortoise to traverse the landscape. The least-cost path was identified between the center point of each of the 25 geographic areas, where the shortest distance with least cost for movement (determined by the resistance surface) was defined. In the isolation by resistance model, a resistance distance was estimated similar to least-cost pathway, except the resistance distance decreases proportionally with the increase in available pathways between locations. The resistance distance also assumes a random walk between locations where the habitat suitability in each adjacent cell is used to determine friction resisting movement. The third model, an isolation by barriers model, was created by identifying barriers to movement across the landscape. Areas with a predicted probability of potential habitat less than 0.125 were coded as "no data" and defined as complete barriers to movement. Within the isolation by barriers model, tortoise were allowed to move across all non-barrier cells without friction.

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[2] A resistance surface is developed in GIS using a habitat suitability model. The probability of suitable habitat is subtracted from 1 for each cell in the model. The resulting values are the resistance surface representing the "cost" of movement from one habitat cell in the model to an adjacent cell.

Limitations
Due to the long generational time (25 years) of desert tortoise, the results of the study based upon genetic information cannot reflect current habitat connectivity or barriers. It normally would take several tortoise generations before the effects of roads or other human made barriers would be reflected in population genetics (Hagerty et al. 2010).

Landscape friction was not significantly correlated with genetic diversity. The variables used in the landscape friction model describe desert tortoise habitat in the present and may not capture the appropriate temporal scale to explain the genetic population structure. The resistance surfaces developed from the habitat suitability model may only reflect habitat use and not the resistance to dispersal (Hagerty et al. 2010).

3. *California Essential Habitat Connectivity Project: A Strategy for Conserving a Connected California* (Spencer et al. 2010)

Purpose
The *California Essential Habitat Connectivity Project* was prepared for the California Department of Transportation (Caltrans) and California Department of Fish and Game (CDFG). The purpose of the study was to increase efficiency and decrease costs of transportation and land use planning, and to reduce wildlife-vehicle collisions. The report was prepared to define a functional and connected network of wildlands. High quality habitat areas and the connections between these areas were defined to maintain wildlife diversity, which is threatened by human development and climate change.

Approach and Methods
The California Essential Habitat Connectivity Project identified habitat connectivity corridors throughout California. The process for defining wildlife connectivity corridors involved:

1. Delineating Natural Landscape Blocks (areas with high habitat value)
2. Identifying which Natural Landscape Blocks to connect
3. Defining Essential Connectivity Areas

Natural Landscape Blocks were delineated based on a rating of the naturalness of the landscape, called an ecological condition index. Within the Mojave Desert, landscape blocks were limited to those areas larger than 4,000 hectares (10,000 acres) with an ecological condition index greater than 95 and with high biological value. High biological value was defined as areas with GAP Conservation Status 1 or 2 and areas with 1) critical habitat for threatened or endangered species, 2) wetlands or vernal pools, 3) CDFG mapped hotspots using a rarity-weighted richness index, or 4) BLM Areas of Critical Environmental Concern. Lines were drawn between the center point of a landscape block and the center point of the closest and second closest landscape blocks.

Least-cost corridor models were used to define essential connectivity areas between Natural Landscape Blocks along each of the lines. The least-cost corridor model used a resistance surface based on the ecological condition index (0 percent to 100 percent) representing the resistance of

the landscape to ecological flow. Using the resistance layer, the cost to move from one landscape block to another was calculated by subtracting the resistance value from 1. The cost of movement from one landscape block to the adjacent block was summed along the entire distance. The area with the 5 percent lowest cost of movement from one landscape block to the next was designated as an Essential Connectivity Area.

Limitations

1. Natural Landscape Blocks excluded Department of Defense lands and multiple-use lands administered by BLM because they did not meet the criteria of being highly conserved and being mapped as having high biological value. Department of Defense lands include areas of high ecological value (Spencer et al. 2010).
2. Spencer et al. modeled connectivity areas on the basis of naturalness of habitat. Species-specific modeling was not used to identify connectivity corridors. The lack of species-specific modeling produces a result that is of limited use to understanding how wildlife would use these corridors as different species have different habitat requirements that affect their movement across the landscape (Tracy 2012). To overcome this limitation, , "Essential Connectivity Areas are placeholder polygons that can inform land-planning efforts, but that should eventually be replaced by more detailed Linkage Designs, developed at finer resolution based on the needs of particular species and ecological processes."(Spencer et al. 2010) Results of finer-scale regional analyses for connectivity should replace the Essential Connectivity Map for those areas in the statewide report.

4. *A Linkage Network for the California Deserts* (Penrod et al. 2012)

Purpose

The California Desert Connectivity Project was designed to identify areas of ecological connectivity that are essential for conserving biological diversity within the Mojave and Sonoran Deserts in California. Key areas of connectivity are identified to maintain genetic diversity. The key areas of connectivity collectively form a linkage design within the California Deserts. The linkage designs were developed to inform land management, land acquisition, restoration, and stewardship decisions in ecological connectivity zones.

Approach and Methods

Habitat connectivity was evaluated for 44 species that were identified as important to the Mojave and Sonoran Desert habitat. Landscape blocks were defined in this study as those areas that are highly protected, including wildlife management areas and Department of Defense lands. The landscape blocks were connected through 22 separate corridors where connectivity analysis was conducted.

Habitat suitability was modeled for the focal species using expert-assigned scores from 0 to 10 for habitat suitability for each factor (see list below). Weights were assigned for the factor to

express relative influence of each factor, such that the weights for all factors summed to 100 percent. Each 30-square-meter (m^2) grid cell was scored across the modeled area. Data used in the expert-based models included scores for:

- Land cover
- Elevation
- Aspect (i.e., facing direction)
- Slope
- Distance to streams
- Road density

Corridor modeling was performed to evaluate habitat connectivity for both desert tortoise and bighorn sheep. A corridor was then defined using a least-cost corridor model and selecting those areas with the 5 percent least cost of movement[3].

Additional wildlife corridors were also defined using least-cost corridor modeling. Land facets[4] were used to define pathways for wildlife to move from high elevation to low elevation under changing climatic conditions. Field surveys were conducted to:

1. Ground-truth data (i.e., field data were collected to verify model data)
2. Document habitat barriers (e.g., roads, railroads, and canals)
3. Document potential crossing structures along those barriers
4. Identify locations where restoration and management would enhance connectivity

The land facet corridors and species-specific corridors were combined and used as a preliminary linkage design. The preliminary linkage design was refined through field investigation and removal of redundant connections between landscape blocks. The resulting linkage design incorporated the analyses of fieldwork, species-based modeling, and land facet corridors.

Limitations

1. The expert-based models used habitat scores and weights selected by experts. This approach is subject to expert bias and differences in expert opinions (Rochet and Rice 2004; Greenland and O'Rourke 2001).
2. An expert-assigned score of 0 for any criterion would reduce the habitat score to 0 regardless of the relative weight of that criterion (Penrod et al. 2012).

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[3] Least-cost corridor modeling involves calculating the "cost" of movement from one cell in a model to the next cell using a resistance surface. The cost of movement is aggregated over the distance between the start and end point.

[4] Land facets are enduring landscape features or units with uniform topographic and soil attributes that are "areas of biological activity" (Penrod et al. 2012).

5. *Draft DRECP Baseline Biology Report* (CEC 2012)

Purpose

The Desert Renewable Energy Conservation Plan (DRECP) is being developed to protect and conserve California's deserts while allowing for renewable energy development in areas that have a low level of environmental conflict. The DRECP Baseline Biology Report provides a summary of environmental and biological conditions within the DRECP Plan Area[5] (Figure 2). The biological baseline data will serve as the basis for conservation planning under the DRECP.

Approach and Methods

Desert Tortoise. The *Draft Desert Renewable Energy Conservation Plan Baseline Biology Report* (CEC 2012) identifies suitable desert tortoise habitat through a GIS model that is built on the results of the model developed by Nussear et al. (2009). The DRECP Plan Area covers areas within southern California deserts. The output of the desert tortoise habitat model developed by Nussear et al. (2009), was used as a base layer in GIS. Potential suitable habitat was first defined in this model as those areas with a predicted probability of desert tortoise habitat suitability of 0.6 or greater. Suitable habitat was then limited to all areas with a probability of suitable habitat between 0.6 and 1.0 that could be reached from any 1.0-rated area, with no intervening unconnected habitat areas.

The model was adjusted for anthropogenic disturbance using the National Landcover Dataset impervious surfaces layer and The Nature Conservancy's (TNC) "highly converted areas" data (TNC 2009; TNC 2010). Areas with high anthropogenic disturbance were converted to zero habitat potential. Additionally, military bases and OHV areas were manually removed from the suitable habitat model layer because they would not be considered for development or reserve areas.

Bighorn Sheep. Suitable habitat for bighorn sheep was modeled at a 1-km^2 resolution using the Maxent model (Phillips et al. 2006). Twenty-four occurrence data points obtained over the DRECP Plan Area were used to calibrate the model and eight occurrence points were used to test the model. Suitable habitat was defined as areas with a modeled probability of 0.236[6] or higher. The threshold for suitable habitat was determined using Jenks Natural Breaks[7] to classify the model output. AUC was used to determine model predictive capability.

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[5] The DRECP Plan Area covers the Mojave and Colorado Desert Ecoregions within California.

[6] The threshold for suitable habitat is much lower for bighorn sheep than for desert tortoise. This could be attributed to the small number of data points used to construct the model for bighorn sheep.

[7] The Jenks method maximizes between class variability and minimizes within class variability to find the strongest natural breakpoint in the histogram of cell probability values. This approach is used to separate

Habitat Connectivity. Habitat connectivity in the DRECP baseline biology study was defined using the GIS outputs of previous habitat connectivity mapping projects, which included:

- *A Linkage Network for the California Deserts* (Penrod et al. 2012)
- *The California Essential Connectivity Project* (Spencer et al. 2010)
- *The South-Coast Missing Linkages Project* (Beier et al. 2006; South Coast Wildlands 2008)
- *A Linkage Design for the Joshua Tree-Twentynine Palms Connectivity* (Penrod et al. 2008)

Limitations

Desert Tortoise. Because the methods used in this study relied on the results of a previous desert tortoise habitat suitability model (Nussear et al. 2009), several limitations of that study would apply:

1. Presence-only-based modeling is commonly subject to sampling bias and spatial autocorrelation (Phillips et al. 2006).
2. Errors may be present in the data used for the model. No data were collected for this study, so it is dependent on the accuracy of other studies (Nussear et al. 2009).
3. There may be variables that are important to tortoise habitat suitability that were not accounted for in the model (e.g., soil type, vegetation diversity, desert pavement) (Phillips et al. 2006).
4. An Off-Highway Vehicle (OHV) area located directly south and east of the Soda Mountain Study Area was included as suitable habitat, which conflicts with the methods described for this study (i.e., OHV areas are not to be included in the model).

Bighorn Sheep. The following aspects are limitations of the model for bighorn sheep:

1. The model may be subject to sample bias and spatial autocorrelation (Phillips et al. 2006).
2. Model accuracy depends on the accuracy of the data used to construct the model (Phillips et al. 2006).
3. The home range of Desert bighorn sheep can be very large, and observations of presence is generally temporally fleeting, and may not adequately represent habitat that can, or will be used by sheep (Tracy 2012).
4. The model was not corrected for human disturbance or other factors that may preclude species presence (Phillips et al. 2006).

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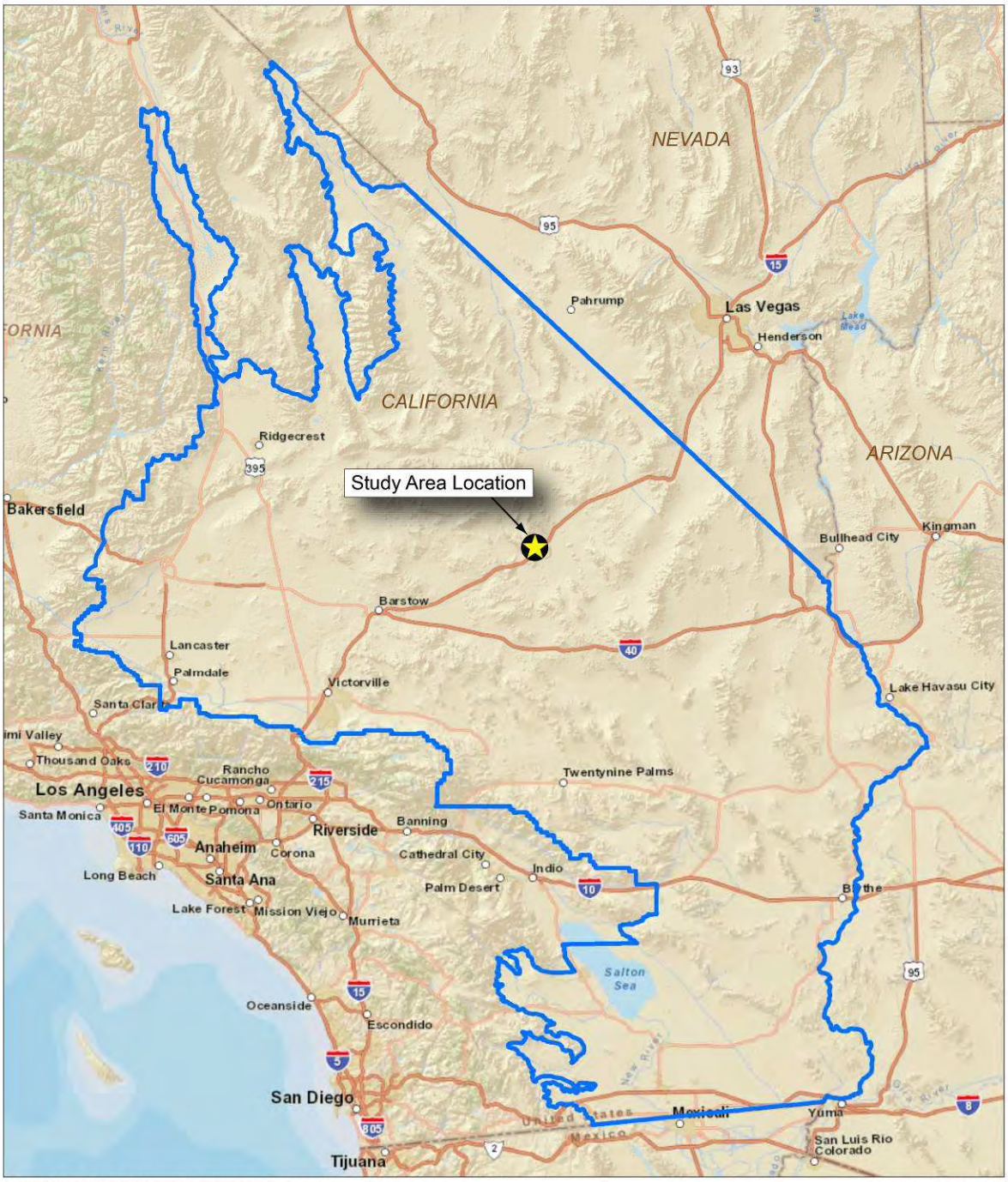
areas of higher probability of occurrence (habitat) from areas of lower probability of occurrence (non-habitat) (CEC 2012).

Figure 2: DRECP Plan Area



SOURCE: ESRI 2012 and Panorama Environmental, Inc. 2012

Scale: 1:3,000,000

LEGEND

Study Area Location

DRECP Boundary

Miles: 0, 25, 50, 75, 100

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Connectivity. The *DRECP Baseline Biology Report* used the base maps from *A Linkage Network for the California Deserts* (Penrod et. al 2012) and *The California Essential Connectivity Project* (Spencer et al. 2010); therefore, the limitations of those efforts, presented previously, apply to the *DRECP Baseline Biology Report* as well. This study did not critically evaluate or prioritize the mapping efforts where there was overlap. The base map for the *California Essential Connectivity Project* includes essential connectivity areas in the Mojave Desert (Figure 3.8, Spencer et al. 2010). Where the linkage map from *A Linkage Network for the California Deserts* (Penrod et al. 2012) overlaps with the base map for the *California Essential Connectivity Project* (Spencer et al. 2010), the finer scale linkage map developed by Penrod et al. (2012) should replace the connectivity base mapping layer developed by Spencer et al. (2010).In the *DRECP Baseline Biology Report*, there was no replacement of mapped connectivity areas with the finer-scale species-specific regional linkage maps where the finer-scale maps overlapped with the generalized connectivity map. The *DRECP Baseline Biology Report* violates and is inconsistent with the method proposed by Spencer et al. 2010, which included replacement of the general connectivity maps with the finer-scale regional maps developed using species specific analysis.

2.2.2 Modelled Results for Soda Mountain Study Area

The general results for habitat suitability and wildlife connectivity modeling are presented in Table 1. Specific results within the Soda Mountain Study Area are also provided in Table 1.

2.3 SODA MOUNTAIN STUDY AREA FIELD STUDIES

Field studies were conducted to evaluate habitat for desert tortoise and bighorn sheep within the Soda Mountain Study Area. These studies include:

- Surveys for desert tortoise
- Aerial and ground surveys for bighorn sheep
- Field surveys of vegetation and wildlife
- Water resources studies
- Geology studies

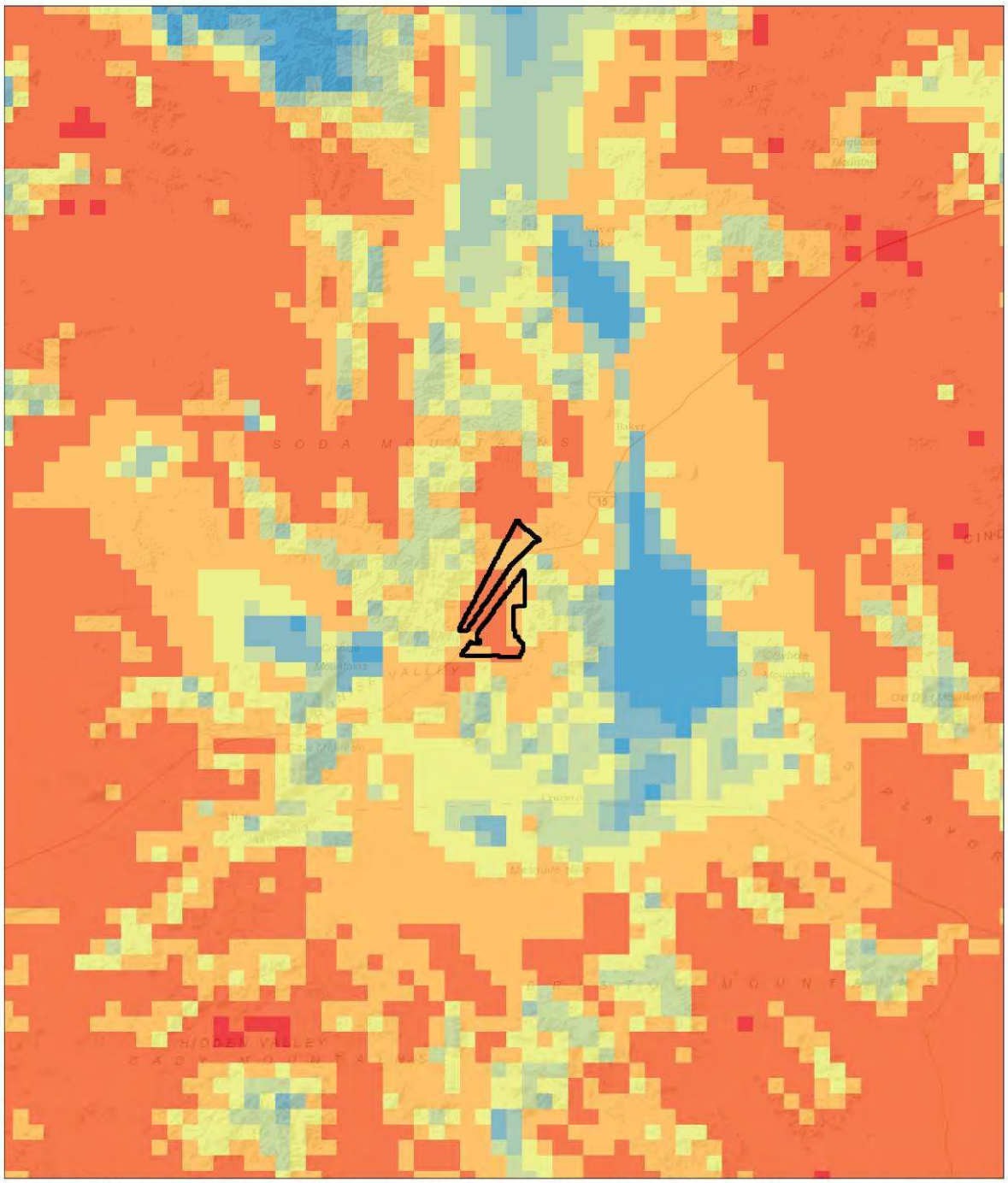
Table 1: Modelled Results for the Study Area

Study	Results/Output	Results for Soda Mountain Study Area
Desert Tortoise		
1 Nussear et al. 2009	The model output was used to produce a map of predicted habitat suitability for the Mojave, Colorado, and Sonoran Deserts. The model result was significant and the AUC test score was	Areas within the Soda Mountain Study Area have a predicted habitat potential between 0.6 and 0.8, indicating the presence of adequate, predicted suitable habitat for desert tortoise, and thus, a

Table 1: Modelled Results for the Study Area		
Study	**Results/Output**	**Results for Soda Mountain Study Area**
	0.93, indicating a good fit between model data and observations. The mean model score for cells where tortoise were observed was 0.84. Ninety-five percent of cells with documented tortoise presence had a model score of 0.70 or higher.	high likelihood of tortoise presence (Figure 3).
5 CEC 2012	The output of this study is a GIS layer depicting suitable habitat for desert tortoise.	The entire Soda Mountain Study Area is identified as suitable habitat for desert tortoise (Figure 4).
Bighorn Sheep		
5 CEC 2012	A map depicting suitable habitat was constructed using the model output. The model had an AUC value of 0.962 for the calibration data and 0.889 for the test data, demonstrating good predictive capability.	The Maxent model identified suitable habitat for bighorn sheep within the southern portion of the Soda Mountain Study Area. Suitable habitat was also identified within the Soda Mountains north and south of the Study Area (Figure 5).
Habitat Connectivity		
2 Hagerty et al. 2010	Geographic distance and dispersal barriers using the isolation by barriers model were identified as dominant factors and were significantly correlated with genetic structure. Landscape friction was not significantly correlated with gene flow. To construct the model and test hypotheses, GIS models of tortoise barriers, resistance, and least-cost corridors were developed. This study supports the conclusion that habitat within the Mojave population of the desert tortoise is well connected.	Barriers to tortoise movement were identified to the south, east and north of the Soda Mountain Study Area. These barriers included the Baker sink to the south and east, and the mountains to the north. No specific barriers to dispersal were identified within the Study Area (Figure 6).
3 Spencer et al. 2010	An Essential Connectivity Map was developed for California. The map includes 850 Natural Landscape Blocks. Areas that connected two or more	The Soda Mountain Study Area is located within an Essential Connectivity Area (Figure 7).

Table 1: Modelled Results for the Study Area		
Study	**Results/Output**	**Results for Soda Mountain Study Area**
	Natural Landscape Blocks were identified as Essential Connectivity Areas. These maps should be replaced with the results of finer scale regional studies (Spencer et al. 2010).	
4 Penrod et al. 2012	This study resulted in maps showing linkage corridors for 44 focal species and for wildlife connectivity in a union of linkages. Linkages were defined for desert tortoise and bighorn sheep.	The Soda Mountain Study Area does not fall within a least-cost corridor delineated for desert tortoise (Figure 8) or bighorn sheep (Figure 9), or a least-cost union.
5 (CEC 2012)	The result of the DRECP effort is a map of habitat connectivity generated using layers from each of the connectivity projects (including Study 3 and 4).	The Soda Mountain Study Area is identified within the Essential Connectivity Area mapped by the California Essential Connectivity Project (Study 3). It is not identified as a connectivity area within any of the other habitat connectivity mapping efforts.

Figure 3: Desert Tortoise Habitat Suitability (Nussear et al. 2009)



SOURCE: ESRI 2012, USGS Western Ecological Research Center 2009, and Panorama Environmental, Inc. 2012

Scale: 1:400,000

LEGEND

Study Area

0 - 0.1
0.1 - 0.2
0.2 - 0.3
0.3 - 0.4
0.4 - 0.5
0.5 - 0.6
0.6 - 0.7
0.7 - 0.8
0.8 - 0.9
0.9 - 1

Miles
0 5 10

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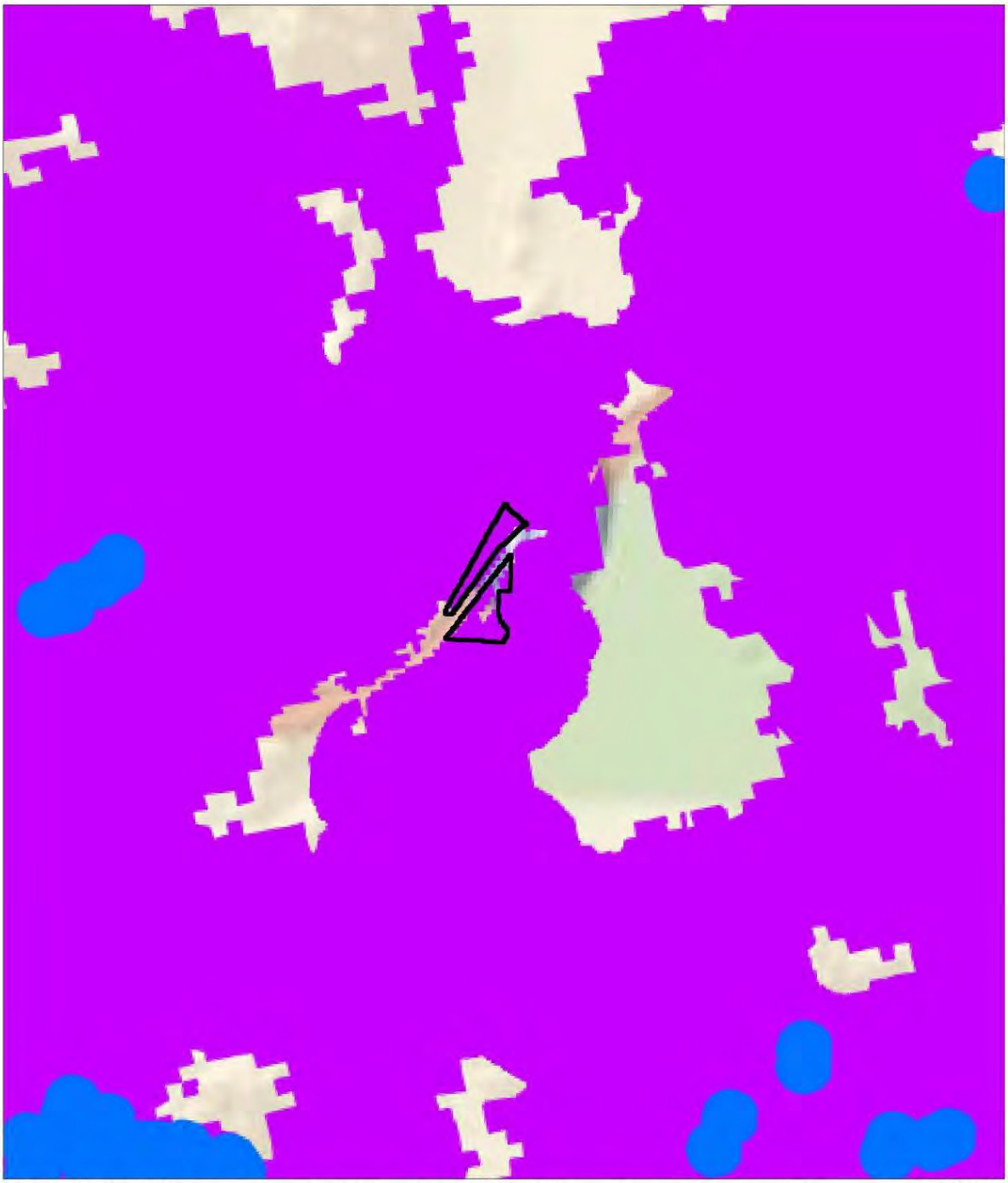
Figure 4: Desert Tortoise Suitable Habitat (CEC 2012)



SOURCE: ESRI 2012, DRECP Species Database 2011, DRECP Land Cover 2011, Dudek ICF 2011, and Panorama Environmental, Inc. 2012

Scale: 1:400,000

LEGEND

- Study Area
- Suitable Habitat
- Species Occurrence

N

0 5 10 Miles

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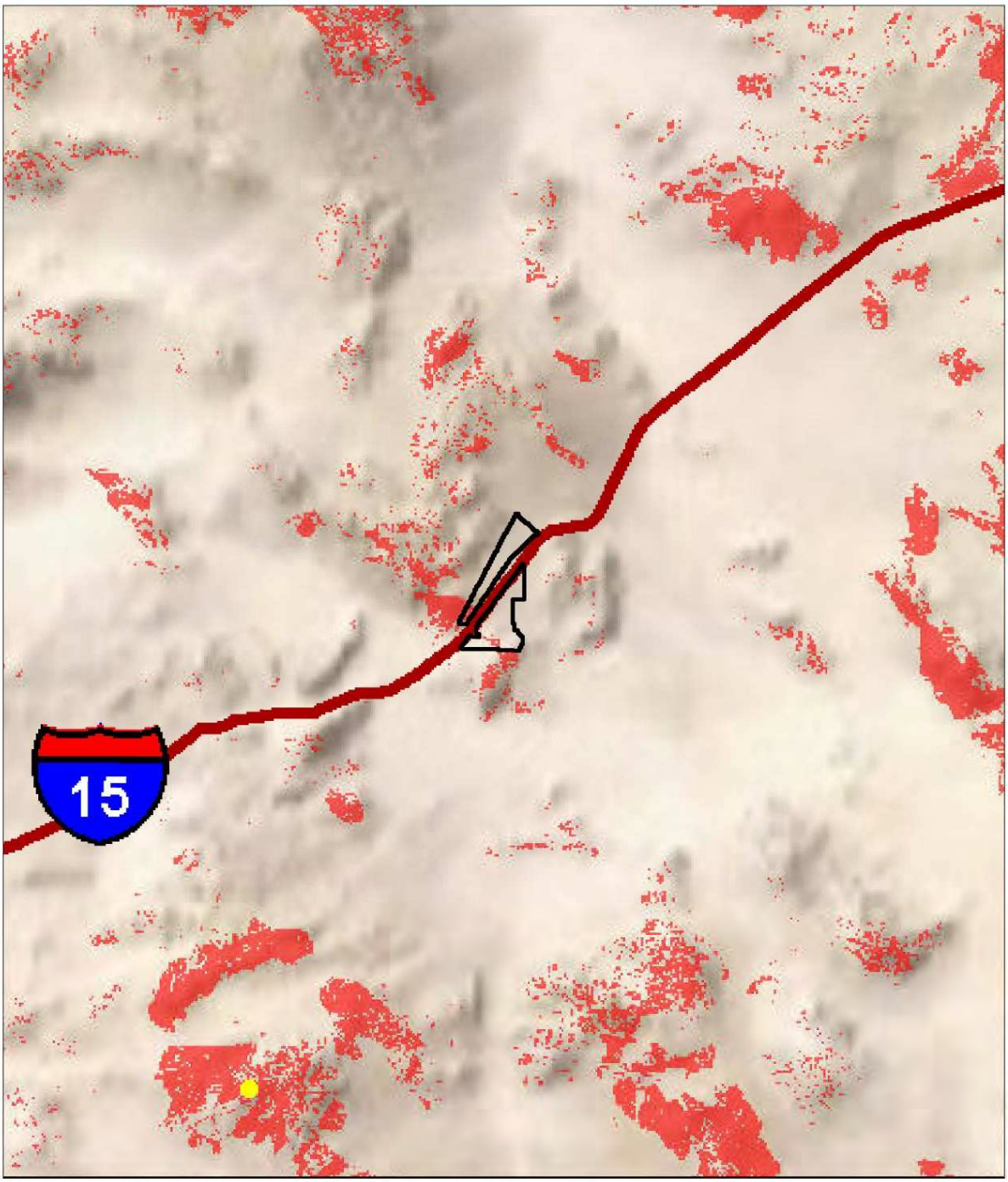
Figure 5: Bighorn Sheep Suitable Habitat (CEC 2012)



SOURCE: ESRI 2012, DRECP 2011, and Panorama Environmental, Inc. 2012

Scale: 1:400,000

LEGEND

Study Area

Bighorn Sheep Suitable Habitat

Bighorn Sheep Occurence

N

0 5 10 Miles

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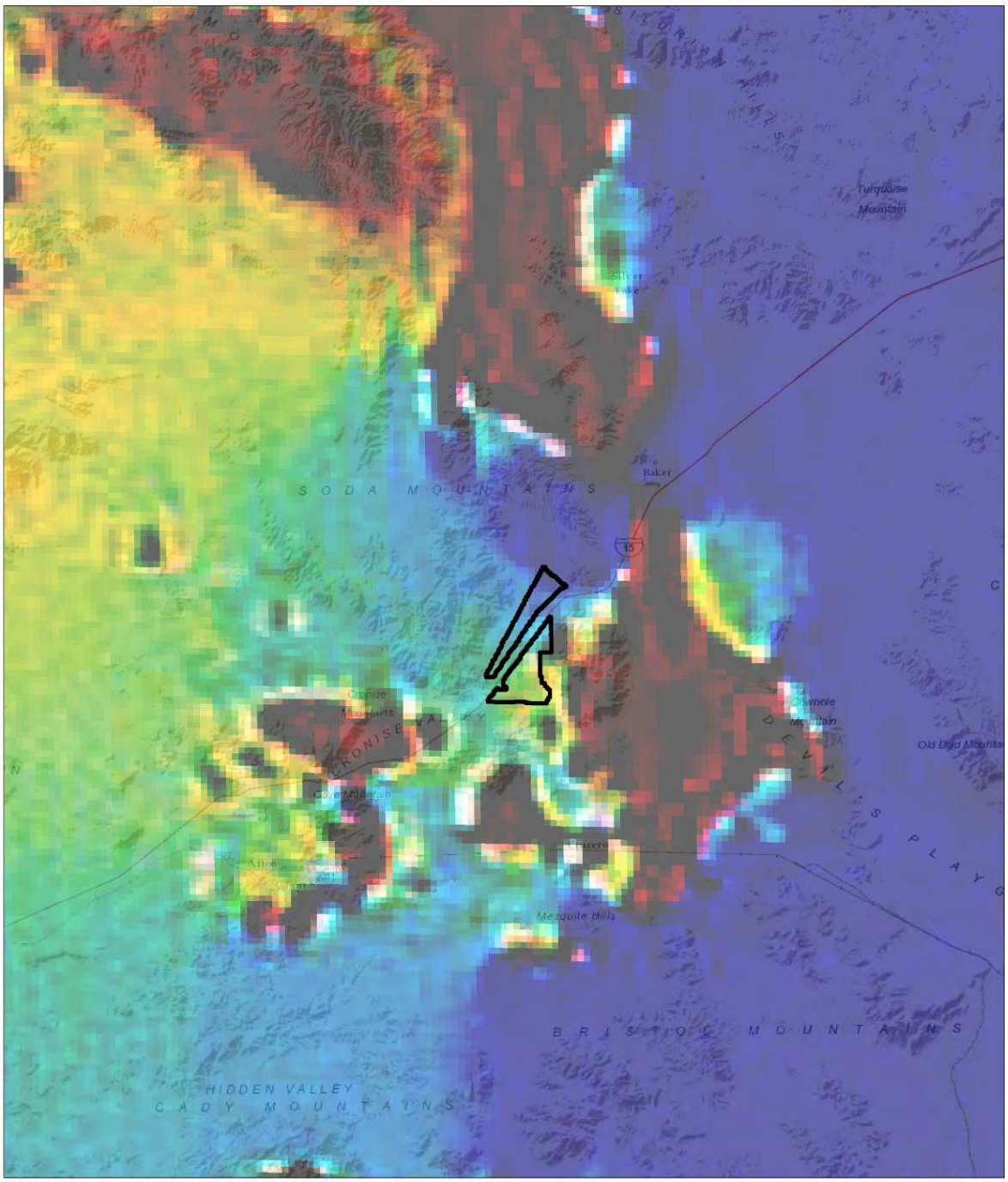
Figure 6: Barriers to Desert Tortoise Movement (Hagerty et al. 2010)



SOURCE: ESRI 2012, Hagerty et al 2010, and Panorama Environmental, Inc. 2012

Scale: 1:400,000

LEGEND

Study Area

Barrier

N

Miles

0 5 10

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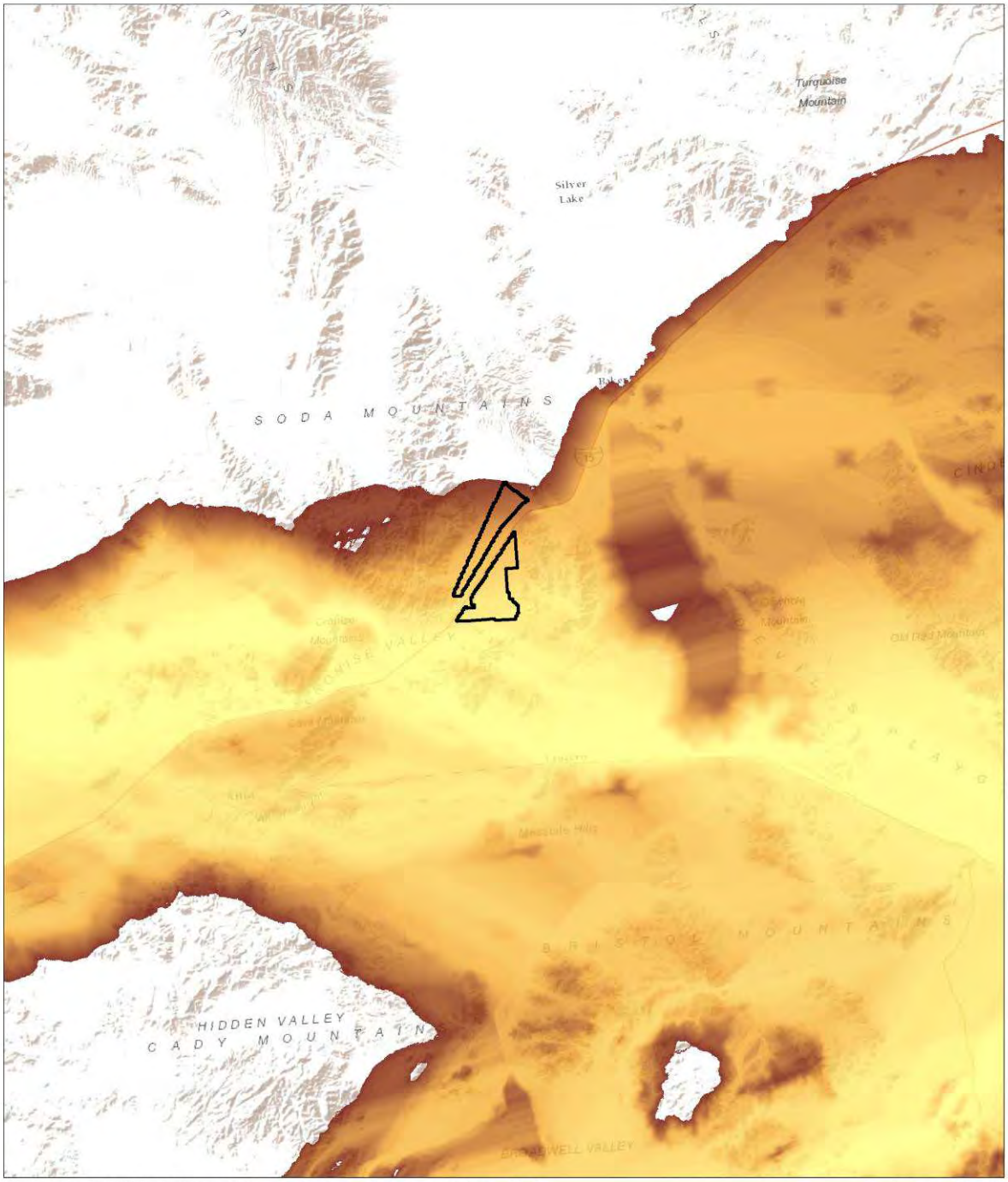
Figure 7: Essential Connectivity Areas (Spencer et al. 2010)



SOURCE: ESRI 2012, CalTrans 2010, and Panorama Environmental, Inc. 2012

Scale: 1:400,000

LEGEND

Study Area

Essential Connectivity Area

More Cost — Less Cost

N

Miles: 0 — 5 — 10

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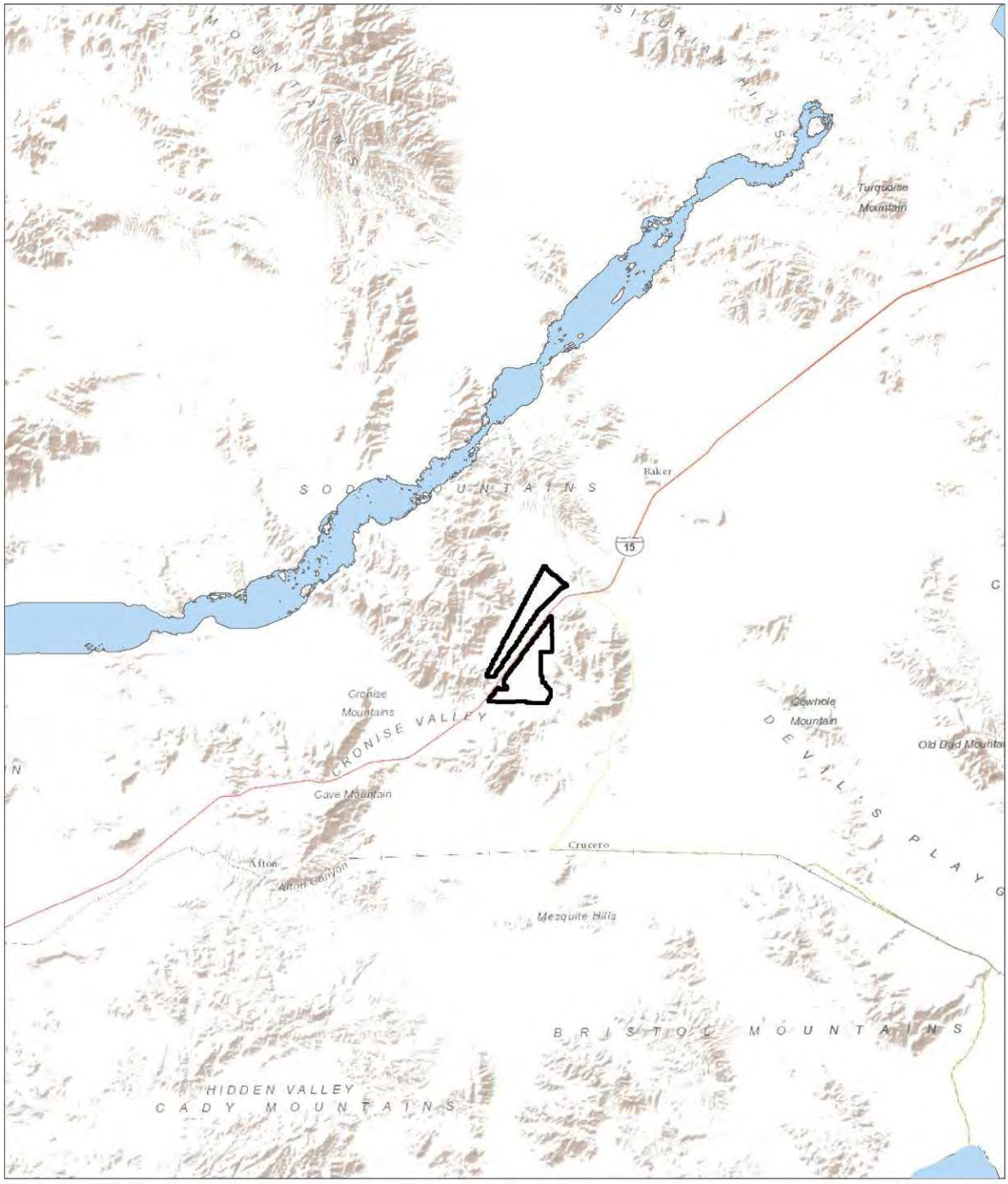
Figure 8: Desert Tortoise Linkages



SOURCE: ESRI 2012, Nussear et al 2009, and Panorama Environmental, Inc. 2012

Scale: 1:400,000

LEGEND

Study Area

Desert Tortoise Linkage

N

0 5 10 Miles

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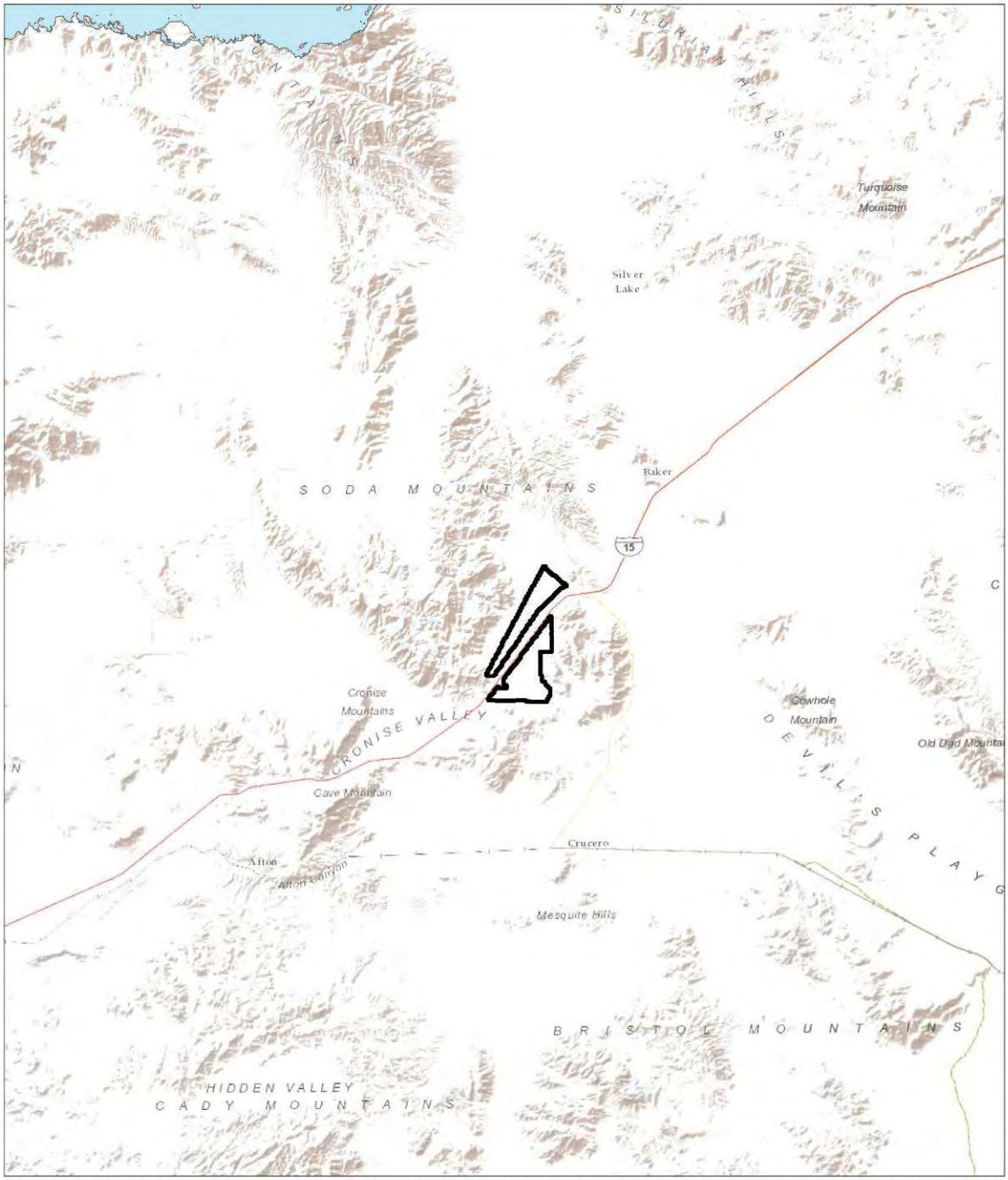
Figure 9: Bighorn Sheep Linkages



SOURCE: ESRI 2012, Mojave Desert Ecosystem Program 2012, and Panorama Environmental, Inc. 2012

Scale: 1:400,000

LEGEND

Study Area

Bighorn Sheep Linkage

N

0 5 10 Miles

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2.3.1 Methods

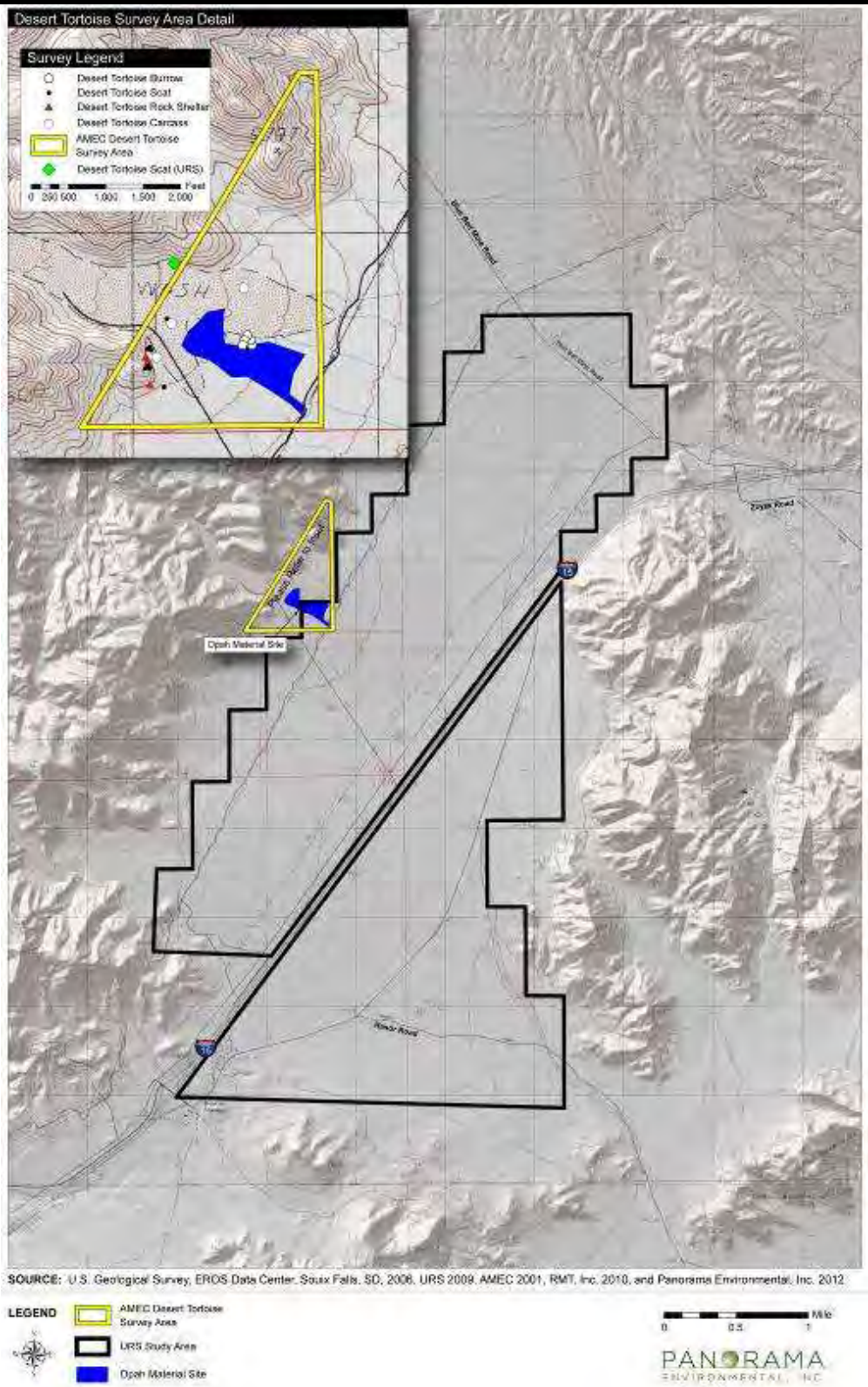
Desert Tortoise

Field surveys for desert tortoise were performed in 2001 and 2009 within the Soda Mountain Study Area and vicinity. The 2001 survey was performed in the Opah Ditch Mine area located in the foothills of the Soda Mountains north of I-15 and west of Los Angeles Department of Water and Power (LADWP) and Southern California Edison (SCE) transmission lines (Figure 10). The survey was performed on March 30 and April 4, 2001, in accordance with USFWS-recommended *Field Survey Protocol for Any Non Federal Action That May Occur Within the Range of the Desert Tortoise* (1992). Belt transects spaced approximately 10 meters (30 feet) apart were walked over approximately 80 percent of the site and the dirt-haul road that provides site access (AMEC 2001). A 30-meter-wide buffer zone survey was performed in accessible areas adjacent to the site. Desert tortoise sign were marked and mapped.

The 2009 survey was conducted for the Soda Mountain Study Area north and south of the I-15 corridor (Figure 10) between May 4 and May 29, 2009. Survey techniques followed both the 1992 USFWS protocol for desert tortoises (USFWS 1992), and the survey protocol described in *Preparing for Any Action that May Occur within the Range of the Mojave Desert Tortoise (Gopherus agassizii)* (USFWS 2009). The field survey consisted of 100 percent coverage belt transects spaced at 10 meters (33 feet) within the entire Study Area. In addition to 100 percent coverage of the study area, Zone of Influence (ZOI) transects[8] were also performed (URS 2009a). ZOI transect locations were located in areas containing potentially suitable tortoise habitat based on aerial image analysis, elevation, and field observations of potentially suitable habitat within the Study Area. ZOI transects were surveyed with transects spaced at 30, 90, 180, 370, and 730 meter intervals, where applicable (URS 2009a). Areas along the mountains where the topography was very steep were not included in the ZOI surveys.

[8] The zone of influence is an area outside of the Study Area that may be affected by a land use action. Zone of influence transects were established outside of the Study Area running parallel to the Study Area boundary.

Figure 10: Desert Tortoise Survey Locations



To validate the accuracy of the protocol surveys, biologists performed an additional intensive quality assurance/quality control (QA/QC) survey on 5 percent of the Study Area (USFWS 1992). This intensive survey effort was a 100 percent coverage using belt transects with spacing width reduced to 3 meters (10 feet) and was conducted in randomly chosen, representative habitats within the Study Area. QA/QC transects were conducted perpendicular to the initial transect survey direction to maximize tortoise detection. A comparison was then made between data recorded from transects during the 100 percent survey effort (10-meter belt transects) and data recorded during the intensive QA/QC survey effort (3-meter belt transects).

Bighorn Sheep

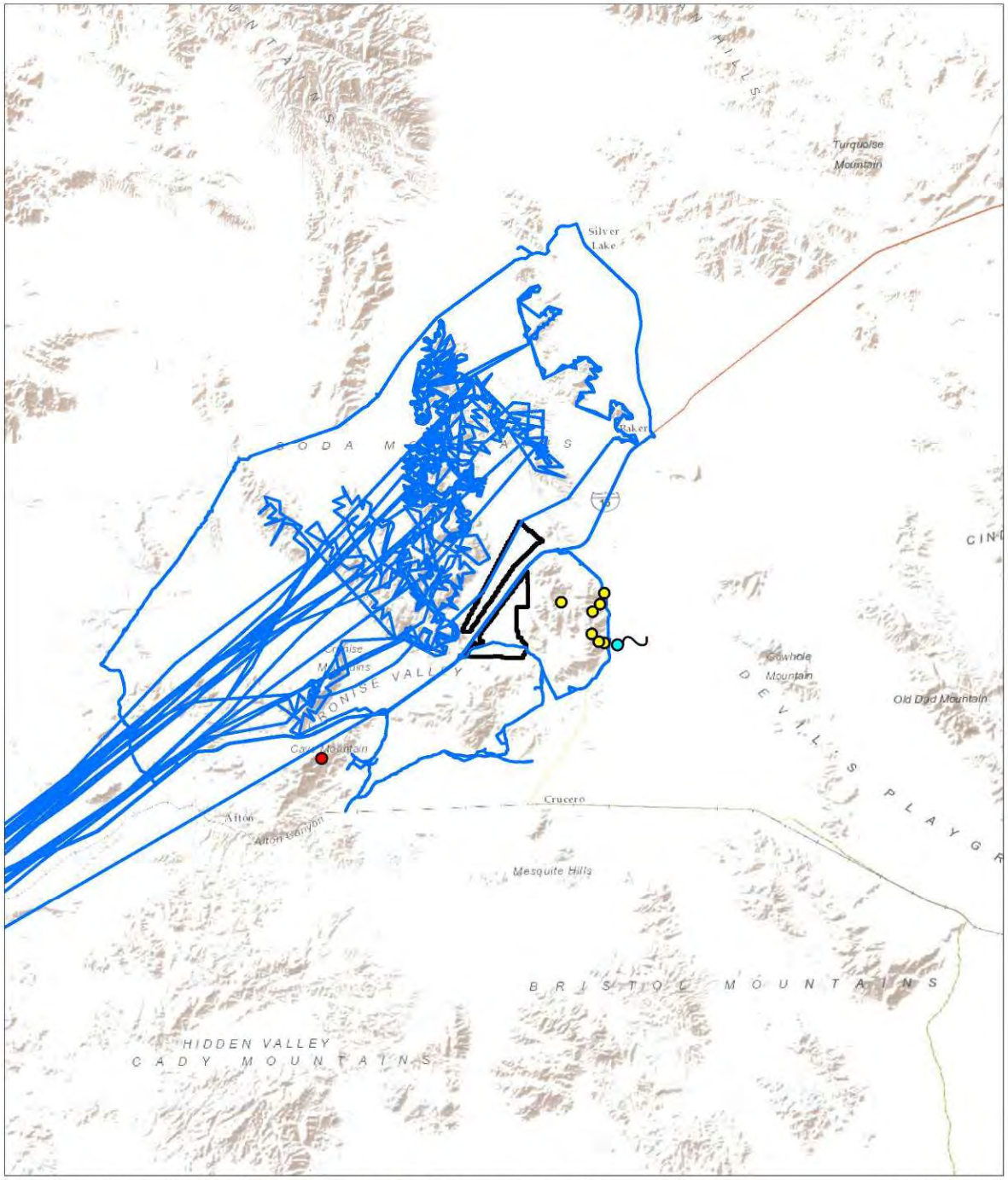
Surveys for bighorn sheep in the Soda Mountains were conducted in 2011 and 2012. Aerial surveys for bighorn sheep were conducted by BioResource Consultants on March 21 and 22, 2011 and May 9, 2011, and ground surveys between March 23 and 25, 2011 (RMT 2011c). The aerial surveys were six two-hour flights. Aerial surveys were conducted north of I-15 within the Soda Mountains. Each canyon was flown up and down. Contouring passes were made at different elevations to cover tall cliffs and long, steep slopes fully. Survey areas for bighorn sheep are identified on Figure 11. Ground surveys were conducted from observation points. During all aerial and ground-based survey work, biologists also scanned for any movement, sign, or habitat settings (e.g., water sources) that might accommodate or predict the presence of desert bighorn sheep. Potential water sources within the search area were identified in advance for surveying and evaluation. Data collected during the surveys included numbers of animals, age of animals and herd composition, general behavior, location, and habitat, where feasible (RMT 2011c).

CDFG conducted a ground survey on April 30 and May 1, 2012 in the south Soda Mountains near Zzyzx Spring. All sheep that could be located on the east side of the range in the vicinity of water were counted. Three groups of biologists explored areas not visible from the road area. One group climbed from the Zzyzx Field Station to the main ridge top above the road and followed the ridge north. Another group ascended a wash to the northwest of the main ridge and climbed into a separate section of the range. The third group searched further south of the field station along the main ridge. The location, number of sheep, class, and gender were logged at each sheep siting (Abella 2012).

Environmental Conditions

Field studies were conducted to document conditions for vegetation, wildlife, soils, water sources, and disturbance within the Soda Mountain Study Area. Biology field studies and a water resource investigation were conducted in 2009 and geology field studies were conducted in 2010 within the Soda Mountain Study Area.

Figure 11: Bighorn Sheep Survey Locations



SOURCE: ESRI 2012, BRC 2011, CDFG 2012, and Panorama Environmental, Inc. 2012

Scale: 1:400,000

LEGEND

- Study Area
- BRC Survey Routes
- BRC Survey Point
- CDFG Survey Point
- Zzyzx Spring

N

0 5 10 Miles

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Biology Studies

Field surveys of the Soda Mountain Study Area were performed in 2009 to assess general and dominant vegetation types, vegetation community sizes, habitat types, and wildlife and plant species present within communities (URS 2009b). Biologists documented wildlife observations for birds, mammals, amphibians, and reptiles within the Study Area during field surveys. The presence of a wildlife species was based on direct observation, wildlife sign (e.g., tracks, burrows, nests, and scat), or vocalization. Field data compiled for wildlife included the scientific name, common name, habitat, and evidence of sign when no direct observations were made. Field surveys conducted in 2009 include:

- Special status plants survey
- Desert tortoise survey (discussed above)
- Avian point count surveys
- Water resource investigation

Special Status Plants. Special status plant surveys were conducted between May 4 and May 30, 2009 in accordance with standardized guidelines issued by the USFWS, CDFG, and the California Native Plant Society (URS 2009c). Surveys were conducted in parallel belt transects spaced at approximately 10 meters throughout the entire Study Area.

Avian Point Count. Avian point count surveys were conducted in the spring and fall of 2009. Field survey methods were derived and adapted from *BLM Solar Facility Point Count Protocol* (2009) and *Managing and Monitoring Birds Using Point Counts* (Ralph et al. 1995). Point count locations were established within the Study Area using the following parameters:

- One (1) point count transect per square mile;
- Eight (8) point count locations per transect; and
- Point counts must be at least 250 meters apart

The point count locations were then further modified in the field based on placing the points in the most suitable areas for birds (e.g., washes, and high vegetation areas) (URS 2010). A total of 10 transects with 8 point count locations per transect (80 points total) were identified within the Study Area (URS 2010).

Spring surveys were conducted between April 23 and May 14, 2009, and fall surveys were conducted between September 30 and October 29, 2009 (URS 2010). Each point was surveyed for a 10-minute observation period and data were recorded on avian species observed within a 100-meter radius. Presence of avian species was determined using direct observation, vocalization, or avian sign (e.g., nests, pellets, whitewash, etc.) (URS 2010).

Water Resources Investigation. A water resources investigation was performed in May and June 2009. Water resources were delineated using U.S. Army Corps of Engineers and CDFG

guidance for delineation of waters of the U.S. and waters of the State (URS 2009d). The ordinary high water mark was used to define the limits of waters within the Study Area.

Geologic Studies

Geologic field studies were conducted in September 2010 throughout the Study Area (Wilson Geosciences 2011). Fifteen geotechnical boreholes were located throughout the Study Area along dirt roads. Boreholes extended from approximately 4 meters to 30 meters (14 feet to 100 feet) feet in depth. Geologic studies defined material types and engineering properties within the construction zone (upper 6+ meters) at all 15 borehole locations; at 12 of these locations data were obtained to depths of 18 to 24 meters using geophysical methods. In addition, electrical resistivity (transient electromagnetic sounding—TEM) surveys at three locations defined general material types, saturated sediments, and estimated depth to buried bedrock.

2.3.2 Results

Desert Tortoise Surveys

The 2001 survey for desert tortoise located west of the Study Area found:

- Five desert tortoise burrows (Class 2-4)
- Nine tortoise scat (Class 2-4)
- Three highly fragmented tortoise carcasses (Class 5)
- Three desert tortoise rock shelters (Class 2)

No live tortoises were observed during the survey. All of the desert tortoise burrows observed were located within the scar of an old borrow (mining) pit, where rocks had been removed and soils were suitable for burrowing.

The 2009 survey for desert tortoise did not find live tortoise, burrows, or sign of tortoise within the Soda Mountain Study Area. One desert tortoise scat was found beyond the western edge of the Study Area during the ZOI surveys along a 370-meter (1,200 foot) interval transect. The scat was identified in the same general location as tortoise sign were previously identified (i.e., during the 2001 Opah Ditch Mine survey performed by AMEC), suggesting that conditions at the Opah Ditch site provide suitable habitat for tortoises. All of the previously identified burrows were located within the borrow pit scar, indicating that the site provides better habitat for tortoises than surrounding areas perhaps because rocks have been removed and the soil is more permeable than the surrounding areas.

Bighorn Sheep Survey

No desert bighorn sheep were observed during the March or May 2011 surveys in the Soda Mountains north and south of I-15. No springs, seeps, or pools of standing water were observed in the mountains above the desert floor. The only water resources observed in this area were the playa lake beds (east of the Soda Mountains and the project area), which still held some water during the March survey. In the plot area south of I-15, two desert bighorn sheep were observed during the March survey fleeing down a ravine approximately 13 kilometers southwest of the Study Area in the Cave Mountains (RMT 2011c). No other individuals or groups of sheep were

seen during the remainder of the March survey, nor during the second survey performed in May 2011 (RMT 2011c).

A total of 47 sheep in seven groups were identified within the south Soda Mountains during the CDFG 2012 survey (Figure 11). The sheep viewed during the survey (Abella 2012) included:

- 26 adult females
- 3 yearling females
- 5 lambs
- 7 yearling males
- 6 older males (three class II, two class III, and one class IV)

The upper elevations above where these sheep were seen had very little sign of recent use by bighorn (Abella 2012). It appears that the eastern portion of the south Soda Mountains, where most of the sheep were seen is occupied primarily by females and associated younger sheep this time of year. Given that few adult males were seen, this population can be projected to fall into the 51-100 size category with the additional males not seen (Abella 2012). Conditions within the south Soda Mountains are highly suitable for bighorn sheep because of the presence of a year-round water source at Zzyzx Spring.

Environmental Conditions

Biologic Resources

Vegetation and wildlife communities within the Study Area were identified during several area surveys, including the desert tortoise survey, avian point count surveys, special status plant surveys, and water resource investigation. The Study Area is sparsely vegetated and includes three vegetation communities/land types identified in Table 2 below. Community/land types are based on dominant vegetation composition and density observed during field surveys of the Study Area (URS 2009a).

Table 2: Vegetation Communities

Vegetation Community	Vegetation Species	Description	Hectares in Study Area
Mojave Creosote Bush Scrub	creosote bush (*Larrea tridentate*) burrobush (*Ambrosia dumosa*) desert senna (*Senna armata*) Mormon tea (*Ephedra sp.*) cheesebush (*Hymenoclea salsola*) big galleta (*Pleuraphis rigida*) chollas (*Cylindropuntia sp.*) beaver tail (*Opuntia basilaris*)	Shrubs are typically widely spaced, with an open canopy and bare ground between individual plants. An annual herb layer is usually present between shrubs and may flower in late March and April with sufficient winter rains. This community is usually found on well-drained secondary soils with very low available water-holding capacity on slopes,	2651 (6,552 acres)

Table 2: Vegetation Communities			
Vegetation Community	**Vegetation Species**	**Description**	**Hectares in Study Area**
		alluvial fans, bajadas, and valleys.	
Mojave Wash Scrub	smoke tree (*Psorothamis spinosus*) blue palo verde (*Cercidium floridum*) cheesebush (*Hymenoclea salsola*) sweetbush (*Bebbia juncea*)	Mojave Wash Scrub is a low, open desert shrub community with a scattered overstory of microphyllous trees. This community is most often observed on sandy bottoms of wide canyons, and sandy, braided, shallow washes of lower bajadas.	21 (52 acres)
Disturbed	N/A	Those areas devoid of vegetation, including unpaved roads, abandoned mining areas, OHV trails, and utility lines (e.g., transmission lines, pipelines, and fiber optic lines). Disturbed areas also include nonnative and/or native communities that have been significantly degraded due to anthropogenic activity.	65 (160 acres)

Source: URS 2009a

Wildlife. The prevailing wildlife species observed within the Study Area include a variety of commonly occurring avian species and, less frequently, commonly occurring mammals, reptiles, amphibians, and invertebrates typical of the Mojave Desert. In general, the Study Area contains relatively low species diversity with the majority of observed wildlife consisting of a few dominant species (URS 2009). This diversity is typical for many parts of the Mojave Desert where vegetation communities are generally sparse and uniform.

Avian Surveys. A total of 629 birds (22 species) were recorded within the Study Area during the spring avian point count surveys. The most abundant bird species observed during the spring surveys were horned lark (*Eremophila alpestris*), black-throated sparrow (*Amphispiza bilineta*), and white-crowned sparrow (*Zonotrichia leucophrys*) (URS 2010). Horned lark accounted for more than 65 percent of total bird observations during the spring surveys. A total of 210 birds (23 species) were recorded within the study area during the fall point count surveys. The most abundant bird species observed were horned lark (*Eremophila alpestris*), Say's phoebe (*Sayornis saya*), and common raven (*Corvus corax*) (URS 2010). Avian abundance was higher during the spring surveys, but species diversity was similar for spring and fall surveys.

Water Sources
There are no perennial water sources within the Soda Mountain Study Area or surrounding valley, all water resources are characterized as ephemeral (URS 2009d). During rain events water draining from the Soda Mountains is conveyed through the site in a series of unnamed desert washes. Water is only available on the site during and shortly after rain events, due to the low levels of precipitation in the area (approximately 4 inches annually) and high temperatures. There is a perennial water source at Zzyzx Spring, on the east side of the Soda Mountains, approximately 8 kilometers southwest of the Study Area.

Surface drainage flows predominantly east and southeast from the Soda Mountains; drainage is interrupted at the I-15 highway where it is directed to several culverts under the freeway. To a lesser extent, drainage flows from the lower mountains on the south, east, and north. Active drainage washes exit the Study Area on the northeast from north of I-15 at Zzyzx Road draining toward Silver Lake and on the southeast at Rasor Road, draining toward Soda Lake (RMT 2011a; RMT 2011b).

Geology/Soils
Soils within the Soda Mountain Study Area are predominantly sand and silty sand. Survey locations were characterized by granitic and volcanic, subangular to subrounded clasts. Particle size ranged from silt and clay to boulders, with most material in the coarse sand to cobble size range (Wilson 2011). Abundant cobbles and boulders were identified throughout the Study Area during field surveys. Alluvial fans and channels with vertical slopes up to 3 meters were observed throughout the Study Area.

Disturbance
The Soda Mountain Study Area lies within a valley that includes a designated BLM utility corridor. Highway I-15 bisects the Soda Mountain Study Area northeast to southwest and is a four-lane, divided highway. Other utilities constructed through the valley include:

- Two transmission lines (and associated access roads),
- Power distribution line
- Two fuel pipelines
- Fiber optic line
- Cell tower

The Xpress West (formerly Desert Xpress) rail right-of-way (ROW) was recently approved by BLM in December 2011 and follows the northwest edge of the I-15 ROW in the Study Area.

The Opah Ditch Mine is located just west of the Study Area. Rasor Road at the south end of the Study Area is a main entrance to the Rasor Road Off-Highway Vehicle (OHV) Recreation area. The OHV area is adjacent to and south and east of the Study Area. Evidence of OHV activity can be seen throughout the Study Area.

3 METHODS

3.1 DESERT TORTOISE HABITAT

Habitat predictions for desert tortoise presented in *Modeling Habitat of the Desert Tortoise* (Nussear et al. 2009) and the *DRECP Baseline Biology Report* (CEC 2012) were compared to desert tortoise field survey results. To evaluate model results for the Study Area, a GIS layer depicting the model results and each of the 16 GIS data source layers were obtained from the USGS (2012). Data layers were overlain with the Study Area to determine the specific results and data being used to characterize the Study Area in the model. Data obtained during field studies were compared with the data used in the model. Study Area field data, including vegetation diversity and density, area physiography and level of human disturbance, were reviewed to identify environmental conditions that could affect or fragment desert tortoise habitat.

3.2 DESERT TORTOISE CONNECTIVITY

Models of desert tortoise connectivity presented in "Making Molehills out of Mountains" (Hagerty et al. 2010) and *A Linkage Network for California Deserts* (Penrod et al. 2012) were evaluated for the Study Area. Because connectivity requires a larger scale analysis, the model results both within the study area and for the surrounding areas were evaluated to determine their accuracy in assessing field conditions and barriers to tortoise movement. Model results were compared with the results of field surveys of desert tortoise and conditions within the Study Area that could be barriers to tortoise movement. This comparison was used to assess the accuracy of connectivity predictions within the Study Area.

3.3 BIGHORN SHEEP HABITAT

Habitat predictions for bighorn sheep presented in the *DRECP Baseline Biology Report* (CEC 2012) were compared with field survey results for bighorn sheep and field-documented conditions within the Study Area.

3.4 BIGHORN SHEEP CONNECTIVITY

The following bighorn sheep experts were contacted to discuss bighorn sheep behavior and potential use of the Soda Mountain Study Area:

- Mr. Andrew Pauli, CDFG, Inland Deserts and Eastern Sierra Region, Apple Valley, California
- Dr. Jack Tuner, Sam Houston State University, Huntsville, Texas
- Mr. George Kerr, Society for the Conservation of Bighorn Sheep, Pasadena, California
- Mr. Chris Otahal, BLM, Barstow, California

The experts were provided information pertaining to the Study Area, including a map showing the study area in relation to the surrounding mountains and human-made features (e.g., I-15), and a description of the Study Area location. The experts were asked to provide information on expected bighorn sheep presence, use of the area, movement, and migration.

3.5 GENERAL WILDLIFE CONNECTIVITY

The methods for assessing wildlife connectivity presented in *California Essential Connectivity Project* (Spencer et al. 2010) and in *A Linkage Network for the California Deserts* (Penrod et al. 2012), were reviewed. Spencer et al. (2010) recommend that the generalized Essential Connectivity Areas developed by the California Essential Connectivity project be replaced by the species specific linkage designs like those prepared by the California Desert Connectivity Project (Penrod et al. 2012):

> "*Essential Connectivity Areas are placeholder polygons that can inform land-planning efforts, but that should eventually be replaced by more detailed Linkage Designs, developed at finer resolution based on the needs of particular species and ecological processes. It is important to recognize that even areas outside of Natural Landscape Blocks and Essential Connectivity Areas support important ecological values that should not be "written off" as lacking conservation value. Furthermore, because the Essential Habitat Connectivity Map was created at the statewide scale, based on available statewide data layers, and ignored Natural Landscape Blocks smaller than 2,000 acres, it has errors of omission that should be addressed at regional and local scales*".

In other words, the method of defining wildlife connectivity in the absence of species specific analysis is inherently flawed because connectivity is dependent on individual species habitat characteristics and how each species moves across the landscape (Tracy 2012). An aspect of the landscape that is a barrier for a reptile would likely not be a barrier to birds or large mammals, for example. General wildlife connectivity is not analyzed further in this case study, and connectivity is analyzed by species. Therefore, further consideration of Essential Connectivity Areas (Spencer et al. 2010) is rejected in favor of the species specific linkages presented in *A Linkage Network for the California Deserts* (Penrod et. al 2012).

4 ANALYSIS

The model results were compared with the field study results for desert tortoise habitat, desert tortoise connectivity, bighorn sheep habitat, and bighorn sheep connectivity. Results are presented in Table 3. The results presented in Table 3 are summarized from the model and field study results presented in Section 2.2.2 and 2.3.2, respectively.

Table 3: Comparison of Model Results to Field Study Results		
Topic	**Model Results**	**Field Study Results**
Desert Tortoise		
Desert Tortoise Habitat	The Study Area has a predicted habitat suitability rating of 0.6 to 0.8 (Nussear et al. 2009) indicating moderately suitable habitat. The Study Area is defined as suitable habitat for desert tortoise (CEC 2012).	No live tortoise, burrows, or other sign were identified within the Study Area during desert tortoise surveys. The Study Area would not be expected to support large populations of desert tortoise because: 1) The Study Area elevation (380 meters to 470 meters amsl) is below the optimum range for desert tortoise. 2) The Study Area is sparsely vegetated. 3) Soils within the Study Area consist of sand and gravel. 4) Numerous rocks, boulders, and cobbles are present in the Study Area. 5) I-15 bisects and fragments potential habitat in the area 6) An OHV area is located south and east of the Study Area and there is evidence of OHV use throughout the Study Area.
Desert Tortoise Connectivity	The Baker Sink is a barrier to desert tortoise movement (Hagerty et al. 2010). Desert tortoise linkage corridors are not identified within the Study Area (Penrod et al.	No live tortoise, burrows, or other sign were identified within the Study Area during desert tortoise or other field surveys. Large numbers of tortoise would not be

Table 3: Comparison of Model Results to Field Study Results		
Topic	**Model Results**	**Field Study Results**
	2012).	expected to move through the area because: 1) I-15 bisects the Study Area and restricts tortoise movement through the area 2) The Study Area is surrounded by mountains 3) Baker sink due east of the study area would inhibit tortoise movement 4) There are steeply sloping channels within the study area
Bighorn Sheep		
Bighorn Sheep Habitat	Suitable habitat for bighorn sheep was predicted in the southern portion of the Study Area and within the Soda Mountains north and south of the Study Area (CEC 2012).	Bighorn sheep were not identified within the Study Area or the north Soda Mountains during field surveys. A population of bighorn sheep exists within the south Soda Mountains and sheep were viewed 13 kilometers south in the Cave Mountains. There are no water sources within the Study Area. The Study Area is flat (<5% slope). There is over 450 meters of flat terrain between the Study Area and the Soda Mountains.
Bighorn Sheep Connectivity	Bighorn sheep linkage corridors were not identified within the Study Area (Penrod et al. 2012)	I-15 bisects the Study Area and is considered an impediment to bighorn sheep movement through the area, although bighorn sheep may

Table 3: Comparison of Model Results to Field Study Results		
Topic	**Model Results**	**Field Study Results**
		use the culverts under the highway.

5 DISCUSSION

5.1 DESERT TORTOISE

5.1.1 Suitable Habitat

The model predictions of desert tortoise suitable habitat (Nussear et al. 2009; CEC 2012) indicate a high probability of desert tortoise presence within the Study Area. Desert tortoise field surveys covering 100 percent of the Study Area along 10-meter transects found no tortoise, burrows or sign within the Study Area. In addition, no desert tortoises were observed during avian point counts, special-status plant surveys, or water resource studies. The divergence between model predictions and field survey results could be attributed to: 1) the model scale, 2) human disturbance throughout the area, which is not accounted for in either model, and 3) there are limitations of stochastic models of habitat suitability.

The models of desert tortoise suitable habitat were constructed using 1-km^2 grid cells. The model construction requires averaging environmental data over a 1-km^2 area. For variables such as slope and rocks, the data used in the model do not accurately characterize field conditions or variability due to the scale of the model. The multi-state geographic scale of the model required the use of large data sets that could be inaccurate. The data used to generate the model identified the Study Area as containing 0% rocks. Site-specific field geology studies indicate that there are numerous rocks, boulders, cobbles, and gravel throughout the Study Area. Soil conditions would not be ideal for tortoise burrowing.

The method used by Nussear et al. (2009) to predict tortoise habitat did not involve removing areas of anthropogenic impact that would no longer be suitable habitat. The Maxent modeling method developed by Phillips et al. (2006) did provide for removal of highly disturbed areas from the model output to increase model accuracy. The adjustments to the suitable habitat model for the *DRECP Baseline Biology Report* removed highly disturbed areas from the model output (CEC 2012). However, within and adjacent to the Study Area, heavily disturbed areas are predicted as suitable habitat in the adjusted model. Both the I-15 corridor and the OHV recreation area south and east of the Study Area are identified as suitable habitat after

adjustments were made to the model. The I-15 highway and OHV land uses have likely resulted in fragmentation and degradation of desert tortoise habitat in the area. While historically the area may have supported higher quality suitable habitat for desert tortoise, the quality of habitat is reduced by current land use and installation of the utilities in the corridor.

There are limitations of stochastic models of habitat suitability. The models do not account for physiological processes that are important to species habitat use. The Study Area lies within a small valley wedged between the north and south Soda Mountains. The presence of Highway I-15 through the center of the valley, and high desert tortoise mortality rates along highways render the area too small to support a population of desert tortoise (Tracy 2012). Studies of tortoise presence along highways reveal that tortoise densities increase further from the highway and high-volume highways can result in decreases in tortoise sign up to 4,000 meters from highways(Hoff and Marlow 2002). Because the Study Area is bounded by mountains, tortoises have very limited usable habitat area that is not near the highway. Analysis of population dynamics, which cannot be provided by modeling alone, is required to evaluate whether desert tortoise would use the area.

The predicted habitat suitability for the Soda Mountain Study Area does not match the documented absence of desert tortoise in the area and the low likelihood of desert tortoise presence due to the site conditions. The presence of surrounding mountains, abundant rocks and cobbles, sparse vegetation, low vegetation diversity, low elevation (below 470 meters), sand and gravel soils, and level of human disturbance indicate that the habitat is fragmented and not highly suitable for desert tortoise. If desert tortoise were to occur in the area, they would be expected in low numbers.

5.1.2 Habitat Connectivity

Habitat connectivity for desert tortoise was evaluated using genetic diversity data (Hagerty et al. 2010). That analysis indicated that genetic distance is closely tied to physiographic barriers to tortoise movement and geographic distance between populations. The Study Area is located adjacent to the Baker sink, which was identified as a physiographic barrier to tortoise movement. The Soda Mountain Study Area therefore is unlikely to lie within a major corridor for tortoise movement; however, some tortoises may move through the area as evidenced by the presence of tortoise burrows and sign west of and adjacent to the Study Area.

Habitat linkages for desert tortoise were modeled in A Linkage Network for California Deserts (Penrod et al. 2012). Desert tortoise linkage areas were not identified within the Soda Mountain Study Area. Linkages for desert tortoise were identified to the south connecting the southern end of Mojave National Preserve to Twentynine Palms and to the north connecting the Kingston Mesquite Mountains to the China Lake South Range approximately 10 miles north of the Study Area. This linkage design would be consistent with documented field conditions including the presence of the I-15 highway, incised channels, and mountainous surroundings that could restrict tortoise movement.

5.2 BIGHORN SHEEP

5.2.1 Suitable Habitat

Predicted suitable habitat for bighorn sheep was identified within the southern portion of the Study Area and the Soda Mountains north and south of the Study Area (CEC 2012). The 2012 survey identified seven groups of bighorn sheep within the south Soda Mountains east of the Study Area (Abella 2012). Areas that bighorn sheep are known to occur within the south Soda Mountains were not identified as suitable habitat by the model. Suitable habitat for bighorn sheep habitat was not identified within the Study Area during field studies (URS 2009a). While suitable habitat may exist within the north Soda Mountains, field surveys did not identify a population within that area. Bighorn sheep are unlikely to occupy the Study Area (Kerr 2010; Pauli 2010; Turner 2010). Sheep likely would have used the margins of the Study Area as a movement corridor between the mountains north and south of the Study Area prior to the I-15 highway. Sheep have, however, been sighted foraging near Zzyzx Road, adjacent to the mountains (Weasma 2012). They may be able to cross through the Study Area using the culverts under the I-15 highway.

The north side of the Study Area is potentially a "transition zone" for bighorn sheep (Kerr 2010). Bighorn would likely cross I-15 at the highway culvert north of the Study Area or the overpass at Zzyzx Road. The bighorn sheep would not stay in the area for long because it does not provide any water. The Study Area is not prime habitat and there is unlikely to be a large population in the area (Kerr 2010). Bighorn sheep rely on the flat lands for food and water, and do not remain in flat areas, except for potential food sources following heavy rains or as potential migration routes (Kerr 2010). Bighorn sheep prefer to stay in the mountainous area, their natural habitat, which provides them with views of the surrounding area and vantage points (Turner 2010). These views allow the bighorn sheep to identify any potential threats in the area.

5.2.2 Habitat Connectivity

The Study Area was not identified within a linkage corridor for bighorn sheep by Penrod et al. (2012). Although there are populations of bighorn sheep in the Soda Mountains to the south, it is unlikely that populations of bighorn sheep would cross through the Study Area due largely to presence of I-15. Individual sheep have previously been seen attempting to cross I-15 or killed along I-15 near the Study Area. Each of the bighorn sheep experts contacted stated that construction of I-15 created a migration barrier for the bighorn sheep. Major interstates are typical barriers to bighorn sheep migration (Turner 2010). Heavy traffic on I-15 discourages bighorn sheep from crossing from one side to the other. If the bighorn sheep were to cross I-15, it would most likely be in the area north of the Study Area where I-15 passes through the mountain range (Turner 2010).

6 CONCLUSION

This report presents an evaluation of five studies used to predict 1) desert tortoise habitat, 2) bighorn sheep habitat, and 3) linkages for desert tortoise and bighorn sheep connectivity. The results of these studies were compared with the results of field surveys performed within an approximately 2,800-hectare (7,000-acre) area located in a valley surrounded by the Soda Mountains.

The model of suitable habitat for desert tortoise (Nussear et al. 2009) identified the Study Area as containing moderately suitable habitat (0.6 to 0.8). Protocol surveys for the Study Area did not identify any sign of desert tortoise within the Study Area. This difference in results can occur for two major reasons: 1) errors in the model input, 2) historic changes in the presence of tortoise habitat (e.g., land use changes), or 3) limitations of the model. Errors in model input could be due to improper data used in the model (i.e., the data did not identify and account for the numerous boulders or cobbles in the Study Area) and the model resolution. Field-documented conditions including low vegetation diversity and density, presence of abundant gravel and cobbles, and the low elevation of the area (below 470 meters are not conducive to supporting a tortoise population; the area would be expected to have low numbers of desert tortoise, if any (Woodman 2012). These conditions were not correctly documented in the model input due to the scale of the model (1-km^2) and the use of data that were not field verified. Historic changes in the presence of tortoises suggest that the habitat may indeed be suitable but that tortoises are not present in the Study Area for other reasons such as population processes centered on excess mortality due to I-15. These processes are not considered in niche habitat modeling. However, population processes play a large role in species presence and can affect tortoise presence, as demonstrated by decreased tortoise sign thousands of meters from high-traffic highways. There are other limitations of stochastic habitat distribution modeling including sample bias (e.g., more samples near highways/roadways) and expected error within models. Models are representations of reality, and cannot account for all conditions that affect habitat and species use of habitat.

Similarly, the model for bighorn sheep predicted suitable habitat in flatland areas of the Study Area that do not possess characteristics of bighorn sheep suitable habitat, although the areas immediately adjacent to the mountains outside the Study Area may be used periodically for foraging. The model also underestimated suitable habitat areas within the south Soda Mountains where bighorn sheep are known to occur. The flatland areas within the southern portion of the Study Area are located adjacent to I-15 and in highly disturbed areas near a gas station. While bighorn sheep could use this area temporarily, they would not be expected to stay in the area for long. The difference in results between the models and the surveys can be attributed to the same factors that impact the accuracy of desert tortoise model results, as well as the use of a lower threshold (0.236) to classify bighorn sheep habitat and the limited number of data points (32) used in the model.

The model for connectivity used by Penrod et al. in *A Linkage Network for the California Deserts*, did not identify the Study Area as part of a linkage area for desert tortoise or bighorn sheep. This model is consistent with the results of field studies and knowledge of area physiography.

7 RECOMMENDATIONS

The Essential Connectivity Area map for the Mojave Desert provided in the *California Essential Connectivity Project* (2010), which identified the Study Area within an Essential Connectivity Area, should be replaced with the maps of habitat linkages in the *Linkage Network for the California Deserts* (2012).

Due to the large geographic area that was modeled in many of the studies reviewed, fine-scale field ground-truthing was not feasible. The *Linkage Network for the California Deserts* used a regional-scale analysis and did use field ground-truthing. Ground-truthing of the data sources used to construct the model could increase the accuracy of the models applied. It would also allow for spot verification of modeled results to increase model reliability.

Field studies are usually conducted at a much finer scale than species habitat models and provide information that are not easily gained through modeling alone. Where available, field information should be used to supplement the information provided in species habitat models to provide a greater understanding of area resources and habitat use. Land use managers should collect field data from private parties so that these data can be used for future land use planning and management. Information provided in models should also be supplemented by more detailed analysis when land use changes are being considered.

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