DEFENDERS OF WILDLIFE
CALIFORNIA PROGRAM OFFICE

EXPECTATIONS AND RECOMMENDATIONS FOR A TIMELY, EFFECTIVE AND LASTING DESERT RENEWABLE ENERGY CONSERVATION PLAN (DRECP)

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Introduction

When Congress established the California Desert Conservation Area in 1976, it found that:

"…the California desert environment is a total ecosystem that is extremely fragile, easily scarred, and slowly healed;" and

"…the California desert environment and its resources, including certain rare and endangered species of wildlife, plants, and fishes, and numerous archeological and historic sites, are seriously threatened…"

The Bureau of Land Management's (BLM) conservation plan for the California Desert was finalized in 1980, and has been amended numerous times, most recently from 2002 through 2006. Renewable energy projects, and especially large-scale solar energy facilities, weren't contemplated and weren't addressed.

The need for a DRECP stems from the massive and recent demand for use of lands within the California Desert for construction and operation of electrical generating facilities utilizing solar, wind and geothermal energy sources. Nearly all of the priority or fast track projects are proposed to be located on public lands; 11 of 13 large scale projects are located entirely on public land. The fast track projects involve approximately 50,000 acres of public lands. However, the BLM has received approximately 125 right of way applications for energy projects covering 1 million acres.

In its current form, BLM's conservation plan currently allows for consideration of renewable energy projects on about four million acres of public lands within the Conservation Area. Public lands are obviously the cornerstone for landscape scale conservation of naturally occurring biological communities in the California Desert. Private lands may also be identified as having essential habitat necessary to support imperiled species of limited distribution or contribute to providing habitat connectivity for multiple species on a landscape scale.

Defenders recommends that the DRECP focus on conservation of multiple species at risk within the approximately four million acres of public lands currently open for

consideration of multiple uses including renewable energy development as well as on private lands. We consider the following species and their remaining habitats especially important in the conservation planning effort:

Desert Tortoise

Although listed as threatened in 1990, the Desert Tortoise has declined dramatically throughout its range, and its habitat continues to be fragmented by a variety of existing and new land uses. Stronger conservation of critical and non-critical habitats is needed, and especially those habitats that provide biological connectivity within and between populations within designated critical habitat units. We are particularly concerned over the vulnerability of occupied Desert Tortoise habitats that provide biological connectivity in several regions including Iron Mountain, Chuckwalla Valley, McCoy Wash, Pisgah Crater and Ivanpah Valley. These areas are particularly vulnerable due to proposed renewable energy development. In the Western Mojave Recovery Unit we are very concerned about habitat connectivity within the Fremont-Kramer and Superior-Cronese Critical Habitat Units.

The DRECP should address these habitat connectivity issues and include measures to restore connectivity where it has been lost or reduced because of multiple land use activities.

Mohave Ground Squirrel

Within its limited range in the Western Mojave, the Mohave Ground Squirrel has been eliminated from much of its habitat by urbanization and agriculture, especially within the Antelope and Victor Valleys. While significant populations and remaining habitat benefit from Desert Tortoise conservation measures, habitat occurring outside of Desert Tortoise Critical Habitat is at risk from existing and future land uses, including renewable energy development.

The DRECP should strengthen existing conservation measures for this species and especially connectivity habitat linking populations occurring in Rose, Searles, Indian Wells, Fremont and Harper Valleys. The habitat connectivity between the Indian Wells, Rose and Searles Valleys is particularly important in light of potential renewable energy development.

Desert Bighorn Sheep

Desert Bighorn occur throughout the California Desert in isolated, suitable mountainous habitats. Approximately 70 subpopulations occur within the Northern and Southern Mojave, and Sonoran Desert metapopulations. The health and persistence of these subpopulations depend on connectivity, which has been lost in many areas, and especially by fenced linear features such as Interstate Highways 10 and 40. With regard to renewable energy development, increased threats to habitat connectivity are of concern in

the Iron, Old Woman, Coxcomb, Palen, Sheephole and Maria Mountains, and the McCoy Wash and Pisgah Crater regions.

We recommend the DRECP also explore opportunities for restoring connectivity in certain key regions that has been lost because of interstate highways and especially across Interstate 40 in the vicinity of the Cady, Newberry, Granite, Old Woman and Sheephole Mountains.

Birds of Prey

We are pleased the Fish and Wildlife Service is addressing the impact of renewable energy project on Golden Eagles through application of new regulations implementing the Bald and Golden Eagle Protection Act. We strongly recommend the DRECP address not only protection of nesting habitat, but also the extensive foraging habitat associated with suitable nesting areas. Loss of foraging habitat will ultimately affect nesting of desert-dwelling birds of prey including Golden Eagles, Red-tailed Hawks and Prairie Falcons. Key raptor areas in the California Desert have been inventoried and mapped by BLM as part of the Conservation Plan. Protection and enhancement of habitat conditions in these areas should be a part of the DRECP. They include the El Paso-Red Mountain; Newberry-Rodman-Ord-Granite Mountains; and the Cady-Bristol-Cadiz-Ward Valley regions.

Potentially Suitable Areas for Renewable Energy Development

Defenders and other prominent environmental organizations in California have prepared recommended criteria for the use in identifying potentially suitable areas for renewable energy project development. The criteria generally call for projects to be located on previously disturbed lands where natural vegetation has been largely eliminated; near existing electrical transmission facilities; and near existing highways and access roads. In the California Desert we also favor facilities that do not require the use of naturally occurring ground and surface water for power plant cooling.

Although the DRECP is intended to streamline the permitting process for projects that would result in the take of species listed under the State and Federal endangered species acts, we expect that the DRECP will establish species conservation commitments to the maximum extent possible throughout the California Desert for all declining and imperiled species. The outcome must stabilize and protect sufficient natural habitat to ensure that species at risk and their ecosystems remain ecologically sound and viable over the long-term and in the face of climate change.

We expect that there will be minimal losses of biologically significant habitat on federal lands; enhancement of these remaining habitats on federal land where existing multiple uses are contributing to decline in ecological health; and effective incentives for locating renewable energy facilities on previously disturbed lands, and especially abandoned or fallow farm lands no longer viable for agriculture.

The DRECP final conservation strategy for the California Desert should eliminate long-term threats to and enhance naturally occurring biological communities; contribute to the recovery of threatened and endangered species; and direct renewable energy projects to disturbed and marginally important habitats to the maximum degree possible. Such a plan needs to be easily understood; utilize conservation techniques known to be effective and readily implemented; and readily evaluated for effectiveness.