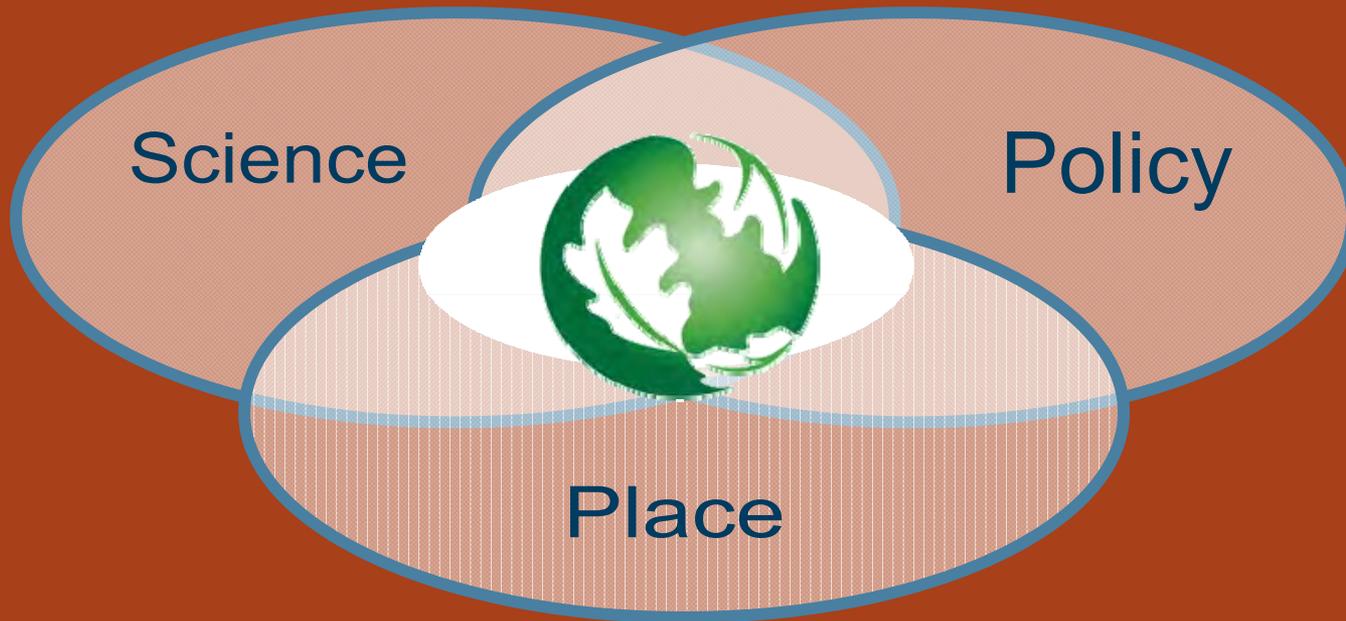




The Nature Conservancy
Protecting nature. Preserving life.



Comments to the DRECP Science Advisors



The mission of The Nature Conservancy is to preserve the plants, animals and natural communities that represent the diversity of life on Earth by protecting the lands and waters they need to survive.

Balancing how to abate the two biggest threats to biodiversity in the Western U.S.

- Climate change
- Habitat destruction

...by strategically siting renewable energy in the right places, quickly to avert catastrophic climate change, but without creating a wave of destructive sprawl.

- Old growth vegetation
- “Fossil water” aquifers
- Ancient wildlife
- Incredible diversity of plants and wildlife, some of which exist nowhere else on Earth.



...via a smart, science-based, comprehensive strategy



Four key planning challenges

1. Thresholds
2. Hydrologic considerations
3. Adaptive learning & management
4. Climate change





The California Desert

“...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...”

Congressional Findings:

Section 601, Federal Land Policy and Management Act



California Desert Conservation Area Plan

- Long-range strategy for multiple use, conservation and maintenance of environmental quality
- No specific zones established for wind, solar and geothermal development
- Authorization required future environmental review and Plan amendment
- Proposed projects considered on a case-by-case basis



Renewable Energy Project Demand

- 11 of 13 large scale fast-track energy projects proposed in the CDCA are located on public land totaling about 50,000 acres.
- BLM has 125 right of way applications for energy projects covering 1 million acres in the CDCA.
- 4 million acres of public land in CDCA open for renewable energy project application
- 12 of 21 fast track projects for all Public Lands are in California



DRECP Land Base

Public lands:

- Cornerstone for conservation and imperiled species recovery
- Large scale, interconnected landscapes
- Natural biological communities

Non-Federal Lands

- May provide habitat essential to sustain and conserve imperiled species
- May be strategically important in maintaining habitat connectivity



DRECP Conservation Strategy

Public Lands:

- Conserve ecosystems and species at risk within the **four million acres** of Public Lands currently open for multiple uses
- Strengthen CDCA Plan conservation
- Identify and allow for multiple uses compatible with conservation goals
- No net loss of habitat for all imperiled species
- Stabilize and enhance habitat for State and Federally listed species

Non-Federal Lands:

- Identify healthy biological communities and essential habitats necessary to conserve imperiled species



DRECP Zoning for Renewable Energy Projects

- Systematically identify and zone lands for renewable energy development that:
 - Lack healthy biological resources
 - Are near developed infrastructure necessary to support renewable energy generation and transmission
- Streamline project permitting and development on degraded lands through incentives, including resolving parcelization issues on private land.



Desert Tortoise

Needs:

- Stronger conservation of critical and non-critical habitats

Regional Areas of Concern and Vulnerability:

- Iron Mountain, Chuckwalla Valley, McCoy Wash, Pisgah Crater, Ivanpah Valley, Western Mojave
- Habitat connectivity, fragmentation and habitat degradation in Western Mojave Recovery Unit.



DRECP Goal:

- Resolve habitat loss and fragmentation issues



Mohave Ground Squirrel

Needs:

- Stronger conservation of remaining habitat

Areas of Concern and Vulnerability:

- Low density, fragmented populations, vulnerable to loss from isolation.

DRECP Goal:

- Stabilize and protect species through stronger habitat protection measures.
- Maintain and enhance habitat and connectivity among populations in Rose, Searles, Indian Wells, Fremont and Harper Valleys.





Desert Bighorn Sheep

Needs:

- Protect all remaining occupied habitat for 60 subpopulations

Areas of Concern and Vulnerability:

- 30% of subpopulations have been lost, Loss of movement corridors between mountain ranges.
- Regions of concern: include Iron, Old Woman, Coxcomb, Palen, Sheephole, Maria and Cady Mountains.
- Climate change over the next 50 years

DRECP Goal:

- Maintain and enhance connectivity habitat
- Build climate change into connectivity models
- Restore habitat connectivity in key areas lost because of interstate highways and especially across Interstate 40





Birds of Prey

Needs:

- Protection of remaining nesting habitat essential, plus adequate amounts of foraging habitat for Burrowing Owl, Golden Eagle, Red-tailed Hawk and Prairie Falcon.

Areas of Concern and Vulnerability:

- Burrowing Owls occur in valleys often sought for solar energy development.
- Approximately 50% of Burrowing Owls occurs within the CDCA.
- Cliff nesting raptors require large foraging territories; and some species are vulnerable to mortality from wind turbine blade strikes.

DRECP Goal:

- Maintain and protect active nesting and foraging habitats for birds of prey in the key raptor areas in the CDCA as identified by BLM.





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 and technology for renewable energy project development:

- Previously disturbed lands where natural vegetation has been largely eliminated;
- Near existing electrical transmission facilities;
- Near existing highways and access roads.
- Designs that do not require the use of naturally occurring ground and surface water for power plant cooling.



Conclusion

The DRECP should:

- Contribute to the recovery of threatened and endangered species;
- Direct renewable energy projects to disturbed and marginal habitats to the maximum degree possible;
- Rely on proven conservation strategies;
- Be easily understood, readily implemented, and easily evaluated.