



California Wind Energy Association

April 7, 2011

To: Scott Flint, Project Manager, DRECP
Kim Delfino, Rick Miller – DRECP Covered Species Working Group Co-Chairs
Fr: Nancy Rader, CalWEA
Re: Comments on Initially Recommended Covered Species and Reserve Design and Assembly Principles
cc: Covered Species Working Group and DRECP Consultants

CalWEA has reviewed the DRECP consultants' and Interagency Team's initial lists of recommended Covered Species and the "Reserve Design and Assembly Principles" document and offers the following comments.

Reserve Design and Assembly Principles – As I stated on the 3/28 call, we would like to see the 3/15/11 draft document reference the fact that wind energy projects are potentially compatible in some reserve, corridor and buffer areas, and could support biological resources and wildlife movement in those areas, presuming careful siting, mitigation and monitoring. Such "co-location" could facilitate the ability to identify and secure large, contiguous reserve areas while simultaneously preserving high quality wind resource areas for development.

Initial Covered Species List Recommendations -- At 53 species, the 3/4/11 consultant's list is in the size range we believe is manageable for this process, and it appears that the 3/29/11 Interagency Team's list could also end up in that size range. We continue to believe that a manageable list is an essential ingredient to the successful and timely completion of the DRECP.

Both lists differ substantially from the list that CalWEA recommended. However, most of the species that we consider to be priorities for inclusion for the wind industry (see our "short list," below) are included on both lists. There are only two species -- the Parish's daisy and the Bakersfield cactus -- that were not included (or tentatively not included) on both lists that we propose be added, for the following reasons:

- **Bakersfield cactus:** While CNDDDB records include only a single observation within the Plan Area, a number of individuals were discovered in association with the Alta Oak Creek Wind Energy Project and the species has been discovered outside its previously recorded historic range. The species is known to hybridize with the more common beavertail cactus and is known to be present in limited numbers in portions of the Antelope Valley, although these locations are not yet listed in the most recent CNDDDB.
- **Parish's daisy:** Wind projects in the DRECP area are frequently required to survey for this sensitive plant when conducting baseline surveys (although we are not aware that it has actually been found).

Three other species on CalWEA's "short list" were included on the consultant's list, and are pending review on the Interagency Team's list: the Mojave tarplant, the Bank swallow, and Tracy's eriastrum. Upon review by the Interagency Team, we hope that they will be included.

Below is the complete list of 18 species that CalWEA believes should be included as covered species under the DRECP, as wind projects in the DRECP area could impact these federally and/or state-listed species, and thus coverage under the DRECP would be prudent and desirable for the wind industry.

Taxa	Common Name	Scientific Name
Bird	golden eagle	<i>Aquila chrysaetos</i>
Bird	burrowing owl	<i>Athene cunicularia</i>
Bird	Swainson's hawk	<i>Buteo swainsoni</i>
Bird	American peregrine falcon	<i>Falco peregrinus anatum</i>
Bird	California condor	<i>Gymnogyps californianus</i>
Bird	bald eagle	<i>Haliaeetus leucocephalus</i>
Bird	Bank swallow	<i>Riparia riparia</i>
Mammal	peninsular bighorn sheep	<i>Ovis canadensis nelsoni</i> DPS
Mammal	Mohave ground squirrel	<i>Spermophilus [Xerospermophilus] mohavensis</i>
Plant	desert cymopterus	<i>Cymopterus deserticola</i>
Plant	Mojave tarplant	<i>Deinandra mohavensis</i>
Plant	Tracy's eriastrum	<i>Eriastrum tracyi</i>
Plant	Parish's daisy	<i>Erigeron parishii</i>
Plant	Barstow woolly sunflower	<i>Eriophyllum mohavense</i>
Plant	Mojave monkeyflower	<i>Mimulus mohavensis</i>
Plant	Bakersfield cactus	<i>Opuntia basilaris</i> var. <i>treleasei</i>
Reptile/Amphibian	desert tortoise	<i>Gopherus agassizii</i>
Reptile/Amphibian	flat-tailed horned lizard	<i>Phrynosoma mcallii</i>

Thank you for your consideration of our views. We look forward to the continued discussions.