



June 11, 2020

Mr. Eric Sklar
President
California Fish and Game Commission
P.O. Box 944209
Sacramento, California 94244-2090
Via email: fgc@fgc.ca.gov

Re: Strong Support for Candidacy of Western Joshua Tree as Threatened

Dear President Sklar,

Founded in 1969, over 50 years ago, the Morongo Basin Conservation Association is pleased, honored, and continues to present our voice to support our mission:

to advocate for a healthy desert environment that nurtures the region's rural character, cultural wealth and economic well-being.

We believe that a healthy desert is essential for the well-being of desert residents and for the health of our local economy. These are the three pillars of sustainability: environment, society, and the economy.

As the effects of climate change become ever more apparent, the recognition and listing of the western Joshua tree as threatened will help preserve and protect our Joshua tree woodlands. Unique and beautiful, the stands of Joshua trees provide an irreplaceable link in the desert ecosystem. The Western Joshua tree is suffering and withering under the impact of climate change with reduced precipitation, increased heat, reduced recruitment, and wildfires due to the spread of invasive plants. The loss of these woodlands due to climate change and poorly planned ongoing development undermines the foundations on which our thriving desert communities have been built.

Combatting and adapting to climate change must be the driver in making appropriate land use and planning decisions. The Mojave Desert is the largest intact ecosystem in the contiguous 48 states and includes the habitat of the western Joshua tree. This special habitat is a global biological 'hot-spot,' home to a large number of unique and diverse species. As extinction rates continue to

grow worldwide, it is imperative we embrace biological diversity as an asset to the health of the entire planet.

We recognize that classifying *Yucca brevifolia* as a threatened species under the California Endangered Species Act (CESA) has significant ramifications both for planned development and for developments now underway. However these represent only a small fraction of the anticipated impacts coming to our world due to the effects of climate change.

Vulnerability of the Joshua tree has long been recognized; we see it singled out for protected status in development code plant ordinances in Apple Valley, Yucca Valley, Palmdale and other municipalities; however, existing local and State regulations are often inadequate, and too often un-enforced. To pin survival of the iconic Joshua tree on the existing patchwork of regulations will almost certainly lead to the erosion of these woodlands and the natural communities that have grown up around them.

Given the scale, rate of change, and magnitude of the climate crisis, a landscape-level planning framework is essential to guide development within the range of the Joshua tree. An opportunity is now presented for the creation of a Natural Community Conservation Plan (NCCP) that covers the range of the western Joshua tree which would provide such a framework and allow for continued smart, and appropriate development while incorporating protection and mitigation measures. Creation of an NCCP would streamline processing of development entitlements and spare individual property owners from having to apply for incidental take permits for small projects or improvements.

There are many examples of the successful implementation of a regional planning process. Claims that the listing will halt or forestall development, are hyperbolic. One need only look at other examples where a regional planning process has been implemented to see that this listing will not inevitably halt development. The Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP) provides evidence of how a region can utilize landscape level planning practices without adversely affecting development. These NCCP frameworks provide for a rational science-based framework and certainties for land use proposals for decision makers, developers, and homeowners while protecting our ecosystems.

This listing will create an opportunity from which to build the broad scale landscape planning that is desperately needed if we are to nurture preservation of this slow-growing species and the desert ecosystem to which it is linked. Taking the proactive step of protecting the western Joshua tree offers an opportunity to get out ahead of the massive adaptations climate change will necessitate. We must seize this opportunity to define a purpose and need in the creation of a NCCP that would include not just the Joshua tree, but a range of issues integral to our continued existence in our ever-warming environment.

Decisive action offers the prospect of a future where the desert is appropriately valued not only for its beauty, but also for the role it plays in the sequestration of large amounts of CO² and its ability to ensure healthy air quality across vast stretches of land. Recognition of existing land use patterns within the range of the Joshua tree have the potential to accommodate additional housing, either through in-fill housing or by construction of Accessory Dwelling Units (ADUs) and 'tiny' houses as are now being encouraged by State legislation.

Will sparing the requirements of managed development be worth the gamble if the Western Joshua tree disappears from the desert landscape in the near future? To relinquish the opportunity to keep the Mojave Desert ecosystem intact through prudent, managed care in order to avoid inconvenient but proven best management practices is to risk a loss that may not be possible to recover. It is our hope that the Commission will grant the listing for the Joshua tree under CESA so that we protect the legacy of this desert icon for future generations.

At its very best, protection of the Joshua tree could be the first step in laying a foundation for a future where fossil fuels have been traded for renewables; where policies and practices provide for social and environmental justice for all; where maintaining a diversity of species in the natural desert environment is given priority; and where prudent use of water resources is recognized as being essential. It is for the reasons above that we urge you to give the strongest possible consideration to listing the western Joshua tree.

Thank you for your consideration and attention.



Steve Bardwell, president
Morongo Basin Conservation Association

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