

Ranchers for Responsible Conservation

Antongiovanni Family Ranch
Cattani Family Ranch
Parker Family Ranch
Rancho Indian Creek, LLC
Robinson Family Ranch
Snow Family Ranch

DOCKET

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

August 19, 2010

To Whom It May Concern,

The Ranchers for Responsible Conservation is a coalition of ranching families formed to foster awareness of the unique biodiversity of the Tehachapi Mountains in light of the threat of development on public lands here. We applaud the Desert Renewable Energy Conservation Plan for its efforts to balance the need for renewable energy development with the conservation of California's desert ecosystem. We are, however, concerned that the inclusion of the Tehachapi Mountains in a desert-centered planning process will not give due consideration to the unique natural resources of our mountain landscape. The recently released Draft Recommendations of the Independent Science Advisors contains many examples in which the DRECP's desert-centered approach is inappropriate for the Tehachapi Mountains. We are particularly concerned about the report's recommendation that the rare and endemic Tehachapi Slender Salamander be removed from the list of considered species. We request that you either expand your analysis to give greater consideration to the habitats, species and ecological processes of the Tehachapi Mountains or exclude mountain areas from a more desert-centered planning process so that they may be considered separately.

The Tehachapi Slender Salamander is listed as threatened under the California Endangered Species Act and is under consideration for federal listing by the U.S. Fish & Wildlife Service. It is endemic to the Tehachapi Mountains and much of its limited range overlaps with the DRECP's planning area. In section 2.5.3 of the report, its authors recommend deleting the Tehachapi Slender Salamander from the list of considered species on the grounds that it is "not occurring in the DRECP planning area or unlikely to be affected by plan actions." We dispute both of these claims. In May of 2009, I observed a Tehachapi Slender Salamander on BLM land in the DRECP planning area that is currently under consideration for wind energy development (T31S R33E Sec24). Little scientific study has been done in this area, but we believe that additional populations of this endemic salamander live in the riparian canyon live oak woodlands that exist in the high elevation drainages of this area.


While you correctly focus on birds and bats in your discussion of the direct impacts of wind development, the indirect impacts of road development deserve greater consideration when evaluating potential development in our steep mountains. The scale of road development that would be needed to enable a utility scale wind energy project in such steep, rocky terrain is immense. During the development of the nearby Pine Tree project, heavy equipment operators

found it challenging to utilize sections of road with a mere 15% grade. Road construction alone for that project involved moving 1.3 million cubic yards of earth, not including the earth work to prepare locations for the project's 80 turbines, which must be placed on 40'x40' flat surfaces. This type of development in our steep mountains would lead to erosion and habitat fragmentation, further threatening species such as the Tehachapi Slender Salamander, which is already under pressure from development and invasive species in other parts of its limited range.

The report's discussions of Special Features (2.7) and Ecological Processes (2.8) further demonstrate a desert bias that cannot accurately capture the habitats, species and connectivity issues of the Tehachapi Mountains. Our riparian zones are characterized by oak woodlands, not the mesquite and palo verde discussed in the report. Rather than playas and sand dunes, we have grasslands, oak woodlands, sage scrub and pinyon juniper forests. The report's discussion of geology, hydrology and soils is entirely focused on desert ecosystems. If the DRECP process is to make recommendations about where development and conservation should occur in the Tehachapi Mountains, it must give thorough consideration to the particular habitats, species and ecological processes of these mountain areas, which are distinct from those of the desert areas that have been the primary focus of your efforts to date.

Thank you for your consideration.

Sincerely,



Emory Cattani
Ranchers for Responsible Conservation

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