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

<b>DOCKET</b>	
<b>09-RENEW-EO-1</b>	
<b>DATE</b>	<u>AUG 24 2010</u>
<b>RECD.</b>	<u>AUG 24 2010</u>

Dear Colleagues:

I am responding to the Public Review Draft of the Desert Renewable Energy Conservation Plan (DRECP) from August 2010. I am a graduate student in herpetology and have spent the past 3 years studying and collecting salamanders, principally *Batrachoseps* and *Ensatina*, in the Tehachapi, Piute, Inyo, and Sierra Nevada Mountains for my PhD dissertation.

I object to amphibians recommended for deletion in section 2.5.3, page 26 of the DRECP draft document. The Tehachapi slender salamander, *Batrachoseps stebbinsi* and the Ensatina, *Ensatina eschscholtzii* should be included on the list of species which will be affected by DRECP projects. In addition I recommend inclusion of the Kern Plateau slender salamander, *Batrachoseps robustus* to the list of species which could be impacted by renewable energy projects within the DRECP. All of these species have documented populations within the DRECP area and appear on the California Department of Fish Game (CDFG) Special Animals List. All three of these animals are known to occur on steep slopes and would be adversely affected by the hilltop grading and soil displacement associated with wind mill installation sites and access roads. The Tehachapi and Piute Mountain's area included in the DRECP is largely privately owned and has not been surveyed for salamanders. Discounting species from this list without knowing their full distribution will make understanding the impact of this project on these species impossible.

Populations of *Batrachoseps stebbinsi* within the current DRECP boundaries are documented in the Caliente Creek drainage from specimen records at the University of California Berkeley Museum of Vertebrate Zoology (MVZ) and from records at the Los Angeles County Museum of Natural History (LACM). In addition, at least two more populations within DRECP boundaries have been recently discovered in the Tollgate Creek drainage. A specimen record from the Tollgate drainage was submitted to CDFG this year from Scientific Collecting Permit SCP 10-334 and tissue samples were collected from 18 *Batrachoseps stebbinsi* at two localities within the Tollgate Creek drainage. These recent discoveries highlight the point made in Section 1.2, page 4 of the DRECP draft to not rely on CNDDDB data and past occurrences to determine absence of species from an area. *Batrachoseps stebbinsi* is a California State Threatened species and is listed as imperiled (G2 S2) on the CDFG Special Animals List.

Populations of *Ensatina eschscholtzii* are also known from within the boundaries of the DRECP from records at the MVZ and from a Tollgate Creek record submitted under SCP 10-334. The subspecies of *Ensatina* which occurs in the Tehachapi and Piute Mountains is the Yellow-blotched salamander *Ensatina eschscholtzii croceater*. *E. e. croceater* appears in Amphibian and Reptile Species of Special Concern in California (Jennings and Hayes, 1994) and is listed as an imperiled or vulnerable subspecies (T2T3 S2S3) on the CDFG Special Animals List.

The Kern Plateau slender salamander, *Batrachoseps robustus* was first described in 2002. It is known from MVZ specimen records within the DRECP boundary from the Scodie Mountains. This species is listed as imperiled (G2 S2) on the CDFG Special Animals list.

*Batrachoseps stebbinsi*, *Batrachoseps robustus*, and *Ensatina eschscholtzii croceater* should be included in the list of amphibians which can be impacted by the activities of the DRECP. All three of these animals have special conservation status, and appear within the DRECP boundaries. Please contact me if you have any further question either by phone (805) 893-4275 or email [evelyn@lifesci.ucsb.edu](mailto:evelyn@lifesci.ucsb.edu).

Sincerely,

A handwritten signature in black ink that reads "Christopher J. Evelyn". The signature is written in a cursive style with a large initial "C" and "E".

Chris Evelyn, MESM  
Graduate Student  
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University of California, Santa Barbara