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**DOCKET**

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May 22, 2012

To Whom It May Concern:

My family and I are long time ranchers and landowners in the Tehachapi Mountain portion of the DRECP planning area. We are supportive of the DRECP and hope that this planning process will prevent utility scale energy development from sprawling into eastern California's most sensitive habitats. My comments are in response to the *Overview of Preliminary Plan-Wide Biological Reserve Design and Renewable Energy Development Scenarios* that was presented at the April 25-26, 2012 meeting of the DRECP stakeholders.

Scenarios 5 & 6 would open up sensitive lands within the Tehachapi Mountains to destructive utility scale development, fragmenting previously intact habitats and threatening the survival of sensitive species. We urge you to keep in mind the unique resource values of the Tehachapi Mountains and proceed with one of the more restrictive development scenarios.

The Tehachapi Mountains are home to one of North America's most vital wildlife corridors and one of its highest concentrations of biodiversity. For this reason, millions of dollars have been invested in conservation here, beginning with the cornerstone Tejon Ranch Conservation and Land Use Agreement in 2008 that protected 240,000 acres. The Nature Conservancy has purchased two ranches and placed an easement on a third, totaling over 31,000 acres, in order to build a minimum viable linkage between Tejon Ranch and the Sequoia National Forest. Given its strategic location, this linkage now provides connectivity between the Sierra Nevada Mountains and the Coastal and Transverse Ranges and is of continental importance. Yet, its ecological functions also depend on the continued integrity of the surrounding rangelands, including lands within the DRECP planning area, in order to support the many natural processes that are critical to species survival, including wildlife migration, genetic exchange, adaptation in the face of climate change, and foraging range for large mammals. Without a robust, intact corridor, species are at risk of extinction as population pressure and development fragment their habitat and climate change alters the natural environment.

The biodiversity of the Tehachapi Mountains stems from its strategic location, as well as its geology, steep elevation gradients and the fact that it remains largely un-fragmented. The Tehachapi region has over a thousand species of native plants, including 40 CNPS listed species, from five converging floristic provinces that meet their limits here: the Sierra Nevada, Mojave Desert, Southwestern California, Inner South Coast Ranges, and San Joaquin Valley. Hundreds of plant species have range limits in the Tehachapis and the area hosts a high number of endemics; the Tehachapan Endemism Area was considered by Jepson to be one of the most significant in the state.

Diversity of flora and habitats leads to diversity of mammals, bats, birds, and herps. Those most at risk from turbine-caused mortality are the species of flight, including the California Condor, Golden Eagle, fifteen other raptor species, 10 species of owls, dozens of species of songbirds, both resident and migratory, and sixteen species of bats, ten of them species of special concern. While not facing direct risk of collision with turbine blades, the indirect impacts to land mammals and herps that result from habitat fragmentation are also significant. Mammal species of conservation concern in the Tehachapi Mountains, include: American Badger, Ringtail,

Lodgepole Chipmunk, Tehachapi Pocketmouse, Little Pocketmouse, Yellow-eared Pocketmouse, and Tulare Grasshopper Mouse. The reptile and amphibian species of the Tehachapis include many that require specialized habitats and/or are endemics with limited ranges. Species of conservation concern include: Foothill Yellow-legged Frog, Western Spadefoot Toad, Tehachapi Slender Salamander, Yellow-blotched Salamander, Western Pond Turtle, and Coast Horned Lizard.

Until the recent surge in wind energy development, the mostly-private, rugged rangelands of the Tehachapis have been off-limits to researchers, their species and habitats little studied. The current pace of energy development risks destroying resources and ecological functions that are poorly understood or not yet known. More analysis, including multi-year studies that incorporate the inter-annual diversity of the climate, must be undertaken. The cumulative impacts of existing wind energy development in the Tehachapis must also be better understood. The Pine Tree wind energy project is a case in point. Whereas its developers projected zero take of Golden Eagles would result from the project, eight deaths have been recorded in its first year and a half of operations, making it the second most deadly wind energy project in the United States.

The land footprint requirements and habitat fragmentation impacts of utility scale wind energy make the Tehachapi Mountains an inappropriate site for additional development. Utility scale wind projects require the construction of dozens of miles of freeway width roads, the clearance of acres of vegetation for high voltage transmission lines and the leveling of mountain tops for turbine pads. This infrastructure, along with the 200-300 foot tall turbines themselves, would fragment this currently intact landscape, interrupting the ecological processes that sustain biodiversity here and threatening sensitive species. Reduced connectivity of habitats and species populations leads to genetic isolation, disrupts food chains, and modifies interactions among species. This in turn reduces species viability and increases local extinction rates, with cascading impacts on ecological communities. Fragmentation is further multiplied by the 'edge effects' that occur in the transition zones between developed areas and natural habitat as disturbance and invasive species diminish the biological value of these areas. Fragments of habitat are more vulnerable to invasion by non-native species, including noxious weeds that can then spread into surrounding areas.

The infrastructure requirements of a utility scale wind energy project would also be highly erosive in the steep terrain and erodible soils of the Tehachapi Mountains. Freeway width roads must be built with switchbacks to avoid the steep inclines that heavy equipment cannot traverse. As such, it takes approximately 40 miles of road to cover five miles of distance in this landscape. Developers of LADWP's Pine Tree project moved 1.3 million cubic yards of earth just to construct roads, not including the earth work to prepare for the project's 80 turbines, which require the leveling of 40ft x 40ft flat pads.

In closing, we urge you to consider the critical wildlife corridor, sensitive species and unique biodiversity of the Tehachapi Mountains as you proceed with the DRECP. The potential for destruction of these valuable resources as contemplated in Scenarios 5 & 6 calls into question the use of the term "renewable" for the resulting energy.

Sincerely,



Mary Elisabeth (Emmy) Cattani  
Ranchers for Responsible Conservation