

Mary Elisabeth (Emmy) Cattani
5100 California Avenue, Suite 234
Bakersfield, CA 93309
661.716.6220
emmy@cattanifarming.com

California Energy Commission

DOCKETED

09-RENEW EO-1

TN # 69804

MAR 05 2013

Mr. David Harlow
Director, Desert Renewable Energy Conservation Plan
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Dockets Office, MS-4
Docket No. 09-RENEW EO-1
docket@energy.ca.gov

March 4, 2013

RE: Endorsement for ACEC in the Tehachapi Mountains

Dear Mr. Harlow,

My family and I are ranchers in the Tehachapi Mountains within the borders of the DRECP. We support the designation of an Area of Critical Environmental Concern in the Tehachapi Mountains west of Highway 14 and north of Highway 58, as shown on the maps for Alternatives 1-6 of the December 2012 draft of the DRECP Alternatives, as well as the inclusion of these lands in the DRECP's Plan-wide Conservation Area. The public lands in this area, consisting of many scattered BLM parcels surrounded by private rangeland, comprise a key part of the Tehachapi Corridor, an area of high biodiversity and a critical regional wildlife linkage.

BLM's Relevance Criteria for ACEC Designation:

The Tehachapi Corridor meets two of BLM's Relevance criteria for an Area of Critical Environmental Concern: 1) a natural process or system and 2) wildlife resources.

Natural Process or System. As described in the Biological Resources section of the DRECP, wildlife corridors support multiple natural processes that are critical to species survival across a regional landscape. These include wildlife migration, genetic exchange, adaptation in the face of climate change, and providing range for large mammals. When a wildlife corridor becomes fragmented, these critical natural processes are disrupted. 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. Fragments of habitat are more vulnerable to invasion by non-native species, including noxious weeds that can then spread into surrounding areas.

The location and diversity of habitats in the Tehachapi Corridor make it an essential wildlife linkage. The Tehachapi Mountains occur at the intersection of the Sierra Nevada, Coastal and Transverse Ranges, flanked on either side by the now highly developed San Joaquin Valley and the arid Mojave Desert. Many species that utilize the Tehachapi Mountains have no other option to facilitate their movement other than this mountain range. The Tehachapis have major

East-West and North-South migration corridors and stopover foraging grounds which attract many transitory species, and create links for genetic flow between divergent floral and faunal populations. The steep canyons and shady, wet drainages of the Tehachapis allow species to move and adjust in response to the increasing aridity and temperatures brought on by climate change.

Wildlife Resources. Prominent well respected authors Brewer, Grinnell and Twisselmann have extensively documented the high biodiversity of the Tehachapi Mountains. A unique conjunction of geography, geology, and climates, the largely un-fragmented Tehachapi region has over a thousand species of native California plants (Kern County has over 2,000), from five converging floristic provinces that meet their limits there: the Sierra Nevada, Mojave Desert, Southwestern California, Inner South Coast Ranges, and San Joaquin Valley. As a result, hundreds of plant species have range limits in the Tehachapis (over 400 species in Kern County), 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). Indeed, there are over 40 CNPS listed species in the Tehachapis, and more than 100 across Kern County.

Diversity of flora and habitats leads to diversity of land mammals, bats, birds, and herps. The Tehachapis are home to species of conservation concern within all of these families. Among the land mammals that have been recorded are the American Badger, Ringtail, Lodgepole Chipmunk, Tehachapi Pocketmouse, Little Pocketmouse, Yellow-eared Pocketmouse, and Tulare Grasshopper Mouse.

The Tehachapis are full of specialized habitats that are ideal for bat roosting, hibernation, and foraging; which include: caves, mines, cliffs, rim rock, abandoned buildings, hollow oak trees, ponds, and creeks. As a result of these habitats, 16 of the 25 California bat species have been recorded in the Tehachapi Mountains. Ten of the 16 are species of conservation concern, and three are migratory tree-roosting bats: the Hoary Bat, Red Bat and Silver-haired Bats.

Bird species in the Tehachapis include raptors, such as the California Condor and Bald and Golden Eagles, as well as special status migratory species such as Willow Flycatcher, Loggerhead Shrike, Bell's Vireo, and Snowy and Mountain Plovers. The Tehachapis have many canyons with southeast to northwest orientations, which are particularly attractive as migration corridors supporting movement from winter habitat in Mexico and Central America to summer habitat in the north. These canyons provide birds with stream and spring water, brush cover, food sources, and reproductive habitats.

A diversity of reptile and amphibian species are found in the Tehachapis, including 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.

BLM's Importance Criteria for ACEC Designation

The Tehachapi Corridor meets two of BLM's Importance criteria for an Area of Critical Environmental Concern: 1) has more than locally significant qualities, and 2) has qualities or circumstances that make it fragile, sensitive, rare, irreplaceable, exemplary, unique, endangered, threatened or vulnerable to adverse change.

More than locally significant qualities. The Tehachapi Corridor is a linkage of continental importance. With the protected lands of the Sequoia National Forest and high Sierra

to the North and Tejon Ranch and the Coastal and Transverse Ranges to the south and west, the Tehachapi Corridor is the last vital link connecting Northern to Southern California and beyond. On its website, The Nature Conservancy calls it “arguably the most vital wildlife corridor in North America.” Recognizing these values, the Nature Conservancy and others in the environmental community and natural resource agencies have made the Tehachapi Corridor a conservation priority. Over the past five years, their investments in private land acquisitions, conservation easements, and research have gone a long ways toward preserving the important biological functions of the Tehachapi Corridor:

- The preservation of 240,000 acres of the Tejon Ranch through the signing of the Tejon Ranch Conservation and Land Use Agreement and the formation of the Tejon Ranch Conservancy in 2008. As provided for in the agreement, a conservation easement was purchased in February 2011 on 62,000 acres of the conserved lands with \$15.8 million in state funding from the Wildlife Conservation Board.
- The purchase of the former San Emigdio Ranch by the Wildlands Conservancy and the formation of the 95,000 acre Wind Wolves Preserve in the late 1990s. Wind Wolves links the Tehachapis to the Coastal Range on the southwestern edge of the Central Valley.
- With a combination of land acquisitions and easements, The Nature Conservancy completed an initial minimum working landscape wildlife linkage through the critical 50 mile stretch between Tejon Ranch and the Sequoia National Forest in Kern County:
 - An easement on the 9,576 acre Parker Ranch in 2008 in partnership with Audubon and the Wildlife Conservation Board
 - The purchase of the 7,297 acre Caliente Ranch
 - The purchase of the 14,945 acre Tollhouse Ranch in 2011 with support from the Sierra Nevada Conservancy and another \$5 million in funding from the Wildlife Conservation Board
- A study by the Southern Sierra Partnership mapping essential habitat linkages throughout the Sierra. Lands in the Tehachapi Corridor were identified as high priority conservation targets.

ACEC designation on the public lands around these conserved private parcels would support and enhance the values that they were made to protect.

Has qualities or circumstances that make it fragile, sensitive, rare, irreplaceable, exemplary, unique, endangered, threatened or vulnerable to adverse change. Two factors threaten the long term viability of the Tehachapi Corridor: its wind energy resource and its proximity to Los Angeles. Should wind energy development be allowed within the Corridor, its most obvious victims would be the aerial species: Golden Eagles, Condors, and other raptors, as well as resident and migrating song birds and bats. At the same time, the region’s terrestrial species and the integrity of the corridor itself would be threatened by the many miles of support infrastructure required by utility scale wind energy. A single wind project requires 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 and lead to soil erosion in this steep and fragile landscape.

The Tehachapi Mountains are also imperiled by their location only three hours drive from the city of Los Angeles, whose growing population and resource needs threaten the few remaining wild places within reach. Over the long term, these include the extraction of resources and forms of development that have not yet been contemplated.

As a multi-generational ranching family in the Tehachapi Mountains, we hope that this region will retain its ranching heritage and territorial integrity. ACEC designation on the BLM parcels within the Tehachapi Corridor would preserve the important biological functions of this regional wildlife corridor, protect biodiversity and prevent the development that threatens to fragment and destroy this unique area.

Thank you for your consideration.

Sincerely,

Mary Elisabeth Cattani and family