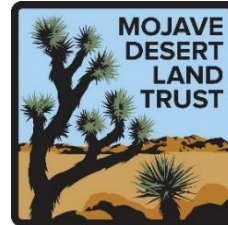




THE WILDLANDS
— CONSERVANCY —



August 4, 2023

California Department of Fish and Wildlife
Habitat Conservation Planning Branch
ATTENTION: San Bernardino County RCIS Comments
P.O. Box 944209
Sacramento, CA 94244-2090
CDFW: rcis@wildlife.ca.gov
San Bernardino County Transportation Authority (SBCTA): jlee@gosbcta.com
Re: San Bernardino Regional Conservation Investment Strategy (RCIS)

Dear RCIS Program and Mr. Lee:

Thank you for the opportunity to provide comments on the draft San Bernardino Regional Conservation Investment Strategy. As our collective desert-based organizations have worked for decades in the region to protect and enhance its fragile biodiversity, and to highlight the region's unique and extraordinary habitats, we appreciate the effort involved and commitment of SBCTA and the Department to the RCIS.

Founded in 1969, The Morongo Basin Conservation Association continues our advocacy for the healthy desert environment that nurtures our rural life, cultural wealth and economic well-being.

Founded in 1995, The Wildlands Conservancy (TWC) is dedicated to preserving the beauty and biodiversity of the earth and providing programs so that children may know the wonder and joy of nature.

Founded in 2006, the Mojave Desert Land Trust uses a multifaceted conservation approach to protect ecologically significant land, restore critical habitat, and preserve native seeds throughout the California desert.

The California Desert Coalition (CDC) elevates the voices of the people of the California desert. We build grassroots coalitions of desert lovers to promote deeper understanding of complex public policy issues. We bring our voices to bear on local, state, and federal decision-making processes that impact our desert.

We strongly support adoption of an RCIS for the region. The science-based San Bernardino County RCIS is a foundational document for the region, covering a vast area representing three ecoregions, and over fifty focal species in the region, including listed and sensitive species such as the western Joshua tree and desert tortoise. The region's habitats, plants and animals deliver multiple conservation values and benefits to communities, such as cleaning our air and water, providing recreational opportunities that fuel our regional economies and support our mental and physical health, and supporting climate resilience.

The approved RCIS can guide voluntary, non-binding conservation actions, and development planning for transportation, energy, water infrastructure, and housing. In addition to facilitating the essential protection of our ecosystems, the approved RCIS will also enable Mitigation Credit Agreements, for credits used by project proponents to streamline and accelerate appropriate infrastructure and development projects. Other benefits of an approved San Bernardino RCIS include:

- Expediting implementation of the Western Joshua Tree Conservation Act,
- Incentivizing early and robust conservation actions aligned with the needs of sensitive species and habitats that may help avoid future listings,
- Providing a competitive advantage to entities applying for conservation grant funding, and
- Enabling advance mitigation credits for wildlife connectivity projects consistent with [SB 790](#).

There are many things to like about this draft. Despite this, however, we did find deficiencies related to the conservation analysis. These issues need to be corrected for the San Bernardino RCIS to be consistent with the statute and the Regional Conservation Investment Strategies Program Guidelines. We believe to ensure collaboration and ultimately conservation success that implementation of the RCIS must have goals that are tracked and measured over time. A primary need is to include objectives for the conservation strategy, targeting habitats and focal/non-focal species. This is required in the RCIS statute¹ and Guidelines², for good reason. Quantifiable goals and targets and measurable objectives are essential to define actions necessary to achieve the goals, develop gap analyses, determine highest-leveraged conservation actions, including advance mitigation actions, and to track progress and document success. This information was included in an earlier draft (2022), and we request that it be fully included in the approved RCIS.

Specifically, we recommend adding:

- **Columns of percentages in Table 3-6 representing the percent of each habitat (public or private) considered conserved as a baseline gap analysis.** The percentages which were included in the texts for each Habitat Group but not in the table, limit usefulness of the table.
- **Habitat Group General Conservation Targets (2022, Table 3-6) as a measure of evaluating conservation gaps.** Habitat group conservation targets are essential to understanding the conservation needs of habitats and species and to guide conservation strategy. The 2022 draft stated, "Conservation targets were developed based on rarity/status, abundance, distribution of habitat in the RCIS area, and life history for the Focal Species in each habitat group."
- **The Gap analysis.** The conservation targets lead to a basic, yet essential, gap analysis that shows the amount of additional land in acres needed to achieve the targets. The acreage figures represent measurable objectives, as required by the RCIS statute and Guidelines.

Without the quantified and measurable conservation targets for each Habitat Group, the RCIS does not contain measurable objectives and related metrics. This information is crucial to understand the region's conservation

¹ See [Fish and Game Code, Division 2. Department of Fish and Wildlife, Ch.9](#) Sections 1851, 1852

² See REGIONAL CONSERVATION INVESTMENT STRATEGIES PROGRAM GUIDELINES: Definitions, Objectives

context, assist users in prioritizing conservation actions for their specific needs, help guide highly leveraged advance mitigation actions for streamlined permitting, or accelerate implementation of the Western Joshua Tree Conservation Act. Please improve and align the current draft to be consistent with the statute and the related *Guidelines* by stating measurable objectives with metrics, and a gap analysis showing acres needed to reach conservation targets.

Additionally, we suggest making the following changes:

- **To adequately consider the value of high-quality conservation lands in the Morongo Basin as established in the [Morongo Basin Conservation Priorities Report](#).** The 2012 report was a joint planning product between the Twentynine Palms Marine Corps Air Ground Combat Center, Joshua Tree National Park, as well as representatives from local governments, from community, business, and conservation organizations, the Mojave Desert Land Trust, Morongo Basin Conservation Association, The Wildlands Conservancy, and California Desert Coalition. We request that the parcels which have a "Composite Score" of High and Moderate-High be included in the "Moderate to High Habitat Value Lands Outside Land Designations" of the RCIS analysis. These lands are recognized by the California Department of Fish and Wildlife and the Wildlife Conservation Board for their habitat value in a Conceptual Area Protection Plan which has been the blueprint for land acquisition in the Morongo Basin for over ten years.
- **Regarding the consistency and complementary aspects of the RCIS with overlapping plans**, it is important to recognize two significant conservation plans currently in the pipeline: (1) The Western Joshua Tree Conservation Act; and (2) The USFWS Desert Tortoise General Conservation Plan. It is therefore imperative that the RCIS have a mechanism in place to allow for smooth, time efficient coordination amongst both plans, including mitigation strategies, to complement the goals of the RCIS. Specifically, the Western Joshua Tree Conservation Act calls for a yet to be drafted conservation plan that will have a profound impact on many of the ecoregions presented by the RCIS. Similarly, the Desert Tortoise General Conservation Plan is currently in the introductory scoping period. The impacts of both plans within the RCIS boundaries are expected to be significant.

The need for detailed metric information is becoming ever more apparent as the York Fire in eastern San Bernardino County is sadly now destroying exquisite keystone habitat for endangered species within San Bernardino County. At the time of this writing, the York fire has scorched approximately 100,000 acres of Mojave National Preserve and beyond, including over 560 acres of highly biodiverse Joshua tree habitat managed by the Mojave Desert Land Trust.

We strongly support having an approved San Bernardino RCIS in our region to help guide, incentivize and streamline conservation and development planning, investments, and implementations. Thank you again for the opportunity to comment and for your commitment to this effort.

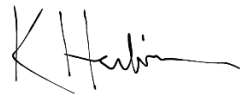
Sincerely,



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