



September 25, 2023

San Bernardino County Board of Supervisors
Dawn Rowe, Chair
Via email: COB@sbcounty.gov

RE: Item 82, Resolution regarding Regional Conservation Investment Strategy (RCIS)

Dear Chair Rowe and Members of the Board,

The Morongo Basin Conservation Association supports the adoption of a RCIS and commitment of the many entities throughout the nearly **12-year** process in developing the Strategy. The need for the adoption of this important voluntary and non-regulatory program is becoming ever more apparent with the on-going climate and extinction crisis.

We strongly encourage that the following item be removed from the resolution as it is biologically unsound and counterproductive:

7. Find the RCIS shall not trigger conservation of vegetation that does not currently require mitigation under CEQA by the lead agency, including, but not limited to, desert scrub, transitional scrub/chaparral/woodland and non-native grasslands that do not support special status, threatened or endangered species. The BOARDS recognizes that 583,527 acres of the 621,818 RCIS conservation acreage recommendation for privately held lands is made up of these three vegetation types according to the January 2022 RCIS draft, Table 3-7.

Current scientific studies and analyses are revealing the important role played by the ecosystem underground in sequestering and holding carbon. It is critical to acknowledge and support this on-going functioning mechanism and inclusion of #7 above would be contrary to this goal.

With the passage of the Western Joshua Tree Conservation Act, inclusion of #7 could undermine efforts to translocate Joshua trees to areas without Joshua Trees present, thereby reducing options to mitigate for impacts to the Western Joshua Tree.

We again appreciate clarifying the important policy aspects of the RCIS but urge #7 be dropped. It is not necessary for realizing all the other components of the resolution. Continued use of the focal species approach will provide the clearest path to streamlined permitting and other benefits.

Thank you for your consideration.

Steve Bardwell, President
Morongo Basin Conservation Association

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