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May 8, 2020

Mr. Eric Sklar
President
California Fish and Wildlife Commission
P.O. Box 944209
Sacramento, CA 94244-2090

Re: Petition to List the Western Joshua Tree (*Yucca brevifolia*) as Threatened under the California Endangered Species Act (CESA)

Dear Mr. Chris Warrick

Please accept these comments on behalf of the Homestead Valley Community Council regarding the petition submitted by the Center for Biological Diversity to list the western Joshua tree as a threatened species under the California Endangered Species Act.

The Homestead Valley Community Council (HVCC) was formed in 1996 to address all matters affecting the Morongo Basin unincorporated communities of Yucca Mesa, Flamingo Heights, Landers, and Johnson Valley. It is comprised of delegates appointed through the community associations of each of these member communities.

HVCC fully understands the ecological and financial importance of preserving the unique plant and animal species that make our deserts so attractive to millions of visitors from around the globe each year. Joshua trees are the most iconic symbol of the Mojave Desert and its associated harsh climate conditions of high summer temperatures with low rainfall totals.

In the Notice of Petition submitted October 2019, the petitioner Center for Biological Diversity states in II. RECOMMENDED ACTION: Listing as Threatened:

*“the western Joshua tree meets the definition of a ‘threatened species’ since it is ‘a native species or subspecies of a ... plant that, although not presently threatened with extinction, is likely to become an endangered species in the foreseeable future in the **absence of the special protection and management efforts . . . (emphasis added)**’ Cal. Fish & Game Code § 2067”.*

As you know Joshua trees (*Yucca brevifolia*) already receive special protection and management efforts under the California Desert Native Plants Act, which regulates their removal. Furthermore, many local conservation organizations and nurseries provide Joshua tree rescue programs that facilitate adoption and replanting trees removed for private development. Much of the Joshua tree population currently exists on public lands already preserved and protected from development.

The petition fails to provide any valid scientific evidence that Joshua trees are declining. Instead the predictions of future decline are based on models that historically have proven to be consistently wrong or grossly inaccurate. We can only imagine how many plant and animal species would be unnecessarily placed on the threatened species list because they “may” become endangered; standards Center for Biological Diversity are requesting be applied here.

The Homestead Valley Community Council believes the current protections for Joshua trees under the California Desert Native Plants Act, and the adoption programs in place have helped keep the Joshua tree populations stable across the southwest. We believe aggressive enforcement of current regulations requiring permits to remove Joshua trees, and expanding adoption/rescue programs will do far more for the sustainability of Joshua trees than listing them as threatened and all the consequential impacts that would have on rural desert communities.

We respectfully ask the California Fish and Wildlife Commission to deny the petition.

Sincerely,

A handwritten signature in cursive script that reads "Jim Harvey".

Jim Harvey
President, Homestead Valley Community Council