



June 10, 2025

DELIVERED VIA EMAIL:

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Department of Fish and Wildlife
Attn: Charlton Bonham, Director
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Fish and Game Commission
Attn: Erika Zavaleta, President
P.O. Box 944209
Sacramento, CA 94244-2090

Subject: Western Joshua Tree Conservation Plan Comments

Dear Director Bonham and Commission Members:

We respectfully request the Department of Fish and Wildlife (“Department”) and the Fish and Game Commission (“Commission”) to prioritize collaboration with local governments and the public – as called for in the legislation¹ – before adoption of the final Western Joshua Tree Conservation Plan (“Plan”) and allow at least 30 days for public comments on a revised draft. We appreciate that the legislation sets a deadline of June 30, 2025 for the Commission to take final action on the conservation plan. However, the legislative intent to approve a plan developed and implemented with meaningful collaboration requires adequate time for review and input from all interested parties, and at this date, we strongly believe final adoption must be delayed.

¹ Section 1927.7. (a) states: “The department shall develop and implement a western Joshua tree conservation plan in collaboration with the commission, governmental agencies, California Native American tribes, and the public.”

We are a coalition of water and business organizations, local government, residents, and community leaders that care deeply about our ability to coexist with the Joshua trees where we live, work, and operate. Most of the region defined as the Western Joshua Tree (WJT) conservation area is economically disadvantaged, making additional costs of maintaining and developing essential infrastructure and housing especially problematic. Many of our coalition provided written and oral comments to the Commission at your first consideration of the Plan, and we must be given sufficient time to review and carefully consider the proposed revisions.

We are currently reviewing the April 2025 revised Relocation Guidelines and Protocols noted in a bulletin posted to the Department of Fish and Wildlife (CDFW) website on May 28, and may provide specific comments on those guidelines later. Unfortunately, the document is posted without a summary of what has been added or changed. We would request CDFW to provide a detailed summary of the changes, or a red-line version of the document, so the public can get a better understanding of how CDFW intends to implement the Western Joshua Tree Conservation Act.

The Relocation Guidelines and Protocols are just one component of a complex implementation plan, and we have yet to see other components, such as a proposed Habitat Conservation Plan. Similarly, some participants in our coalition have heard suggestions from CDFW staff about changes that could be made to lessen the impacts on needed public projects and residential property owners. However, we need more certainty to enable all our coalition entities to plan and carry out projects and operations vital to the housing, utilities, safety, and affordable coexistence of people with the Western Joshua trees.

Our coalition members remain keenly interested in resolving several additional issues that bear on the ability for people and communities to thrive alongside and among the Joshua trees. For most of our group, these include:

- Clarification of terms including “take,” “harm,” “essential habitat,” and “project site” specific to this Plan, to prevent recurring fees for the same trees.
- Minimization of buffers for necessary public works, housing, and residential projects.
- Exemptions and/or expedited permitting for public works, housing, and residential projects, and exemptions for wildfire mitigation and emergency response activities.
- Streamlined delegation of authority to local jurisdictions (cities and counties).
- Clear and scientifically based goals and milestones defining successful implementation of WJT conservation.
- Timely identification and procurement of areas for WJT relocation, and clear accountability for the best use of funds collected as fees.
- Pre- and post-implementation analysis of potential and actual costs, and associated social and economic impacts of the WJT Conservation Act.
- Guidelines and financial incentives for encouraging WJT care in urban and residential areas.

While the above list is neither exhaustive, nor detailed, we hope that by reiterating our concerns in general terms it will help to focus CDFW efforts on the kind of issues that need to be addressed in forthcoming plans. We are somewhat encouraged by productive conversations with CDFW staff in the field, and remain hopeful that the Department and the Commission will work cooperatively

with our members to find the right balance for maintaining a safe and affordable place to live, and conserving this iconic species that we, as residents, cherish.

Sincerely,

Morongo Basin Residents for Reasonable
Joshua Tree Regulations

Adnan Anabtawi
Mojave Water Agency

Clifford Moriyama
California Building Industry Association

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Richard Filgas
California Farm Bureau Federation

Beau D. Cooper
United Engineering Group

cc: Governor Gavin Newsom
Wade Crowfoot, Secretary for Natural Resources
State Senator Rosilicie Ochoa Bogh
State Senator Suzette Martinez Valladares
Assemblymember Juan Carrillo
Assemblymember Greg Wallis
Assemblymember Tom Lackey
Los Angeles County Supervisor Kathryn Barger
San Bernardino County Supervisor Paul Cook
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