



Basin and Range Watch

January 27th, 2015

To: Fish and Game Commission, 1416 Ninth Street, Room 1320, Sacramento, CA 95814

Email: fgc@fgc.ca.gov

Subject: Support of listing for the Flat-Tailed Horned Lizard

To Whom it May Concern,

Basin and Range Watch would like to submit this letter of support for the petition from Center for Biological Diversity to list the flat-tailed horned lizard (FTHL) (*Phrynosoma mcallii*) as endangered pursuant to the California Endangered Species Act (CESA), Fish and Game Code Section 2050, et seq. Pursuant to Fish and Game Code Section 2073.5 and Section 670.1 of Title 14 of the California Code of Regulations, the Department of Fish and Wildlife (Department) has prepared this evaluation report for the FTHL Petition.

Basin and Range Watch is a group of volunteers who live in the deserts of Nevada and California, working to stop the destruction of our desert homeland. Industrial renewable energy companies are seeking to develop millions of acres of unspoiled habitat in our region. Our goal is to identify the problems of energy sprawl and find solutions that will preserve our natural ecosystems and open spaces.

The California Department of Fish and Wildlife has determined that this listing “may be warranted” and we agree with this for the following reasons:

1. There is evidence that the FTHL populations have declined in portions of their range.
2. The actual range of the FTHL has been reduced.
3. Both distribution and abundance have been reduced in the FTHL range.
4. Some FTHL life history traits render it particularly vulnerable to natural and anthropogenic impacts.
5. The petition has identified threats to valuable micro-habitat for the FTHL.
6. The petition has identified threats to reproductive viability.
7. The petition has identified immediate threats to the FTHL.

8. The petition has pointed out the existing agency management in not sufficient to sustain the species.

The massive land rush of renewable energy projects and permitting in Imperial County, California has removed actual habitat for FTHL. Projects like Ocotillo Sol and the Ocotillo Wind Express Project have been built in important linkage areas for FTHL. These projects have directly killed several lizards and have destroyed the habitat. Agencies often approve these projects before adequate mitigation is worked out. We have been informed that the massive network of roads bulldozed for the Ocotillo Wind Project have favorable hiding places for FTHL and this has resulted in mortality from vehicle kills. We have also learned that lizards have been observed on these roads right after the water trucks wet them down for dust control. This has also resulted in increased mortality for the species. The project was approved with “Adaptive Management” mitigation requirements and it is obvious that many threats and mortality factors were not considered.

The Flat – tailed horned lizard is a species that has seen serious population declines due to agriculture, urban sprawl, recreation, mining activities and now from renewable energy. We feel that past management actions have fallen short to protect the species. This is why we believe that the species should have more protection under the California Endangered Species Act.

Thanks,

Kevin Emmerich

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