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May 20, 2022

California Fish and Game Commission  
P.O. Box 944209  
Sacramento, CA 94244-2090

Madam President, Members of the Commission,

Thank you for this opportunity to express Antelope Valley Conservancy's **strong support** for listing the western Joshua tree for protection under the California Endangered Species Act.

**The Joshua tree is a keystone specie of Mojave Desert habitats.** The loss of Joshua trees results in the loss of hundreds of associated species, who rely on Joshua tree woodlands' duning habitat and food web for food sources, surviving heat/cold, breeding, and dispersal.

**The loss of a Joshua tree woodland is irreplaceable in our lifetimes.** Existing in the western Mojave Desert for 2.5 million years, each Joshua tree takes 50 years to mature and lives for hundreds of years. Joshua trees rely on a single insect, the Pronuba Moth, for pollination, and short-distance seed dispersal by rodents. There is a slow rate of propagation of Joshua trees in natural settings.

**The California Department of Fish & Wildlife claim that Joshua trees are "abundant and widespread" is in error.** Joshua tree numbers have diminished 85 percent in the past century and their destruction is accelerating. CDFW claims that listing is premature, yet most of the prime desert Joshua tree woodlands in the west Mojave Desert have already been destroyed.

**Without CESA protection, Joshua trees will disappear from the west Mojave in a couple of decades.** Without CESA protection, there is no penalty for their destruction and no compensatory mitigation to require and to fund realistic conservation. Local governments allow Joshua trees to be transplanted to parking lots as mitigation, offering no habitat value.

Antelope Valley Conservancy strongly hopes you agree to listing the Western Joshua Tree as a threatened, endangered specie in Section 670.2 (plants).

Respectfully submitted  
**by Resolution of the Board of Directors**  
**ANTELOPE VALLEY CONSERVANCY**

By Christina Andrews  
Corporate Secretary