



DESERT TORTOISE COUNCIL

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Via email only

6 January 2014

To: Mr. Carl Roundtree, Assistant Director
National Landscape Conservation System and Community Partnerships
Bureau of Land Management
1849 C. Street NW, Room 5665
Washington, D.C. 20240

RE: Nominations of public lands managed by the Bureau of Land Management for National Conservation Land status

Dear Mr. Roundtree:

The Desert Tortoise Council (Council) is a private, non-profit organization comprised of hundreds of professionals and laypersons who share a common concern for wild desert tortoises and a commitment to advancing the public's understanding of this species. Established in 1976 to promote conservation of tortoises in the deserts of the southwestern United States and Mexico, the Council regularly provides information to individuals, organizations and regulatory agencies on matters potentially affecting the desert tortoise within its historical range.

On 11 October 2013, the Council took the opportunity to recommend specific regions within the California Desert Conservation Area-portion of public lands managed by the Bureau of Land Management (BLM) to California, State Director, James Kenna for additional protections for the federally-listed, threatened desert tortoise. We are not sure if Mr. Kenna has forwarded that letter to your office. Therefore, we are taking this opportunity to present your office with these formal nominations to ensure that they are viewed by appropriate BLM personnel.

The Council understands that designating public lands managed by the BLM within the California Desert Conservation Area (CDCA) as National Conservation Lands (NCL) within the National Landscape Conservation System will provide somewhat more protection to native habitats than management provided for Areas of Critical Environmental Concern (ACEC) and Desert Wildlife Management Areas (DWMAs) but not be as protective as designated Wilderness Areas. We believe that designating the public lands managed by the BLM identified herein for NCL status will predictably assist in the recovery of Agassiz's desert tortoise (*Gopherus agassizii*) by further reducing the threat of solar and wind development on these newly designated NCLs.

1. The Council fully supports the recommendations of the Desert Tortoise Preserve Committee (DTPC) in their 5 August 2013 letter to State Director, James Kenna's office in which they identified public lands managed by the BLM that would benefit their mission to preserve and recover listed populations of the desert tortoise in the far western portion of the West Mojave Desert (1a, 1b, and 1c, below) and elsewhere (1d and 1e). Like the Council, the DTPC strives to protect tortoises in their native habitats, and we believe that including the following public lands managed by the BLM would benefit tortoises in the West Mojave Desert where they may be most imperiled and other locations where the DTPC has existing management commitments:

- a. Desert Tortoise Research Natural Area (DTRNA).
- b. Public lands managed by the BLM within the Fremont Valley and Rand Mountains that would connect the DTRNA to Red Rock Canyon State Park and the El Paso Mountains.
- c. The Pilot Knob grazing allotment, including the eastern shore of Cuddeback Dry Lake to the Black Hills and continuing east to the western boundary of China Lake Naval Air Weapons Station.
- d. Public lands managed by the BLM within the Chuckwalla DWMA.
- e. Public lands managed by the BLM adjacent to Mojave National Preserve, within the Chemuevi and Piute-Fenner DWMA's.

We understand from conversations with Dr. Larry LaPre (personal communication 9/19/2013) that the Final Solar Energy Development Programmatic Environmental Impact Statement (Solar PEIS) currently precludes solar energy development from desert tortoise critical habitat and ACECs (including DWMA's, which are designated as ACECs). However, we also understand that the Desert Renewable Energy Conservation Plan (DRECP) will further modify the PEIS, so there is a current opportunity to designate the following two categories of land for NCL status to preclude both solar and wind energy development from these essential tortoise habitats:

2. The Council nominates all public lands managed by the BLM in DWMA's throughout the CDCA for NCL status. Whereas general regions for tortoise recovery were identified as conceptual DWMA's in 1994 (USFWS 1994b), specific public lands managed by the BLM were formally identified as DWMA's in the BLM's three regional plans, including Northern and Eastern Colorado Desert Coordinated Management Plan (BLM 2002a), Northern and Eastern Mojave Desert Management Plan (BLM 2002b), and West Mojave Plan (BLM 2005) and later formally adopted in respective Records of Decision.

3. Finally, although we believe that most critical habitats are included within formalized DWMA's, we want to be sure and therefore nominate all desert tortoise critical habitats identified by the U.S. Fish and Wildlife Service (USFWS) in its 1994 Federal Register Notice (55(26):5820-5866) (USFWS 1994a) for NCL status.

It is our understanding that these and other nominations will be formalized in plan amendments associated with the DRECP. We sincerely hope the BLM will take this opportunity and proactive step to conserve and recover the federally- and state-listed population of Agassiz's desert tortoise by accepting these NCL nominations.

Thank you for your attention to this nomination.

Regards,



Edward L., LaRue, Jr., M.S.

Desert Tortoise Council, Ecosystems Advisory Committee, Chairperson