



# THE DESERT TORTOISE COUNCIL

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UNITED STATES DEPARTMENT OF THE INTERIOR  
Interior Board of Land Appeals  
801 N. Quincy Street, Suite 300  
Arlington, Virginia 22203

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 14 September 2013, the Council submitted comments on Desert Tortoise (*Gopherus agassizii*) Translocation throughout the Species Range within Southern Nevada District and Caliente Field Office, Nevada, DOI-BLM-NV-S010-2012-0080-EA, Population Augmentation. We submitted additional comments protesting the intended release of tortoises into critical habitat on March 14, 2014. We received your response dated by stamp as April 7, 2014.

We remain deeply concerned about the issues of tortoise genetics especially in the long term, population impacts, and overall habitat quality at the site under current conditions. We believe that the translocation of approximately 600 tortoises from the Desert Tortoise Conservation Center under the revised guidelines issued March 19, 2014 has not been sufficiently reviewed and that the NEPA analysis, as well as a focused scientific analysis of the genetic and population effects, must be required.

At this time we voice our support of the appeal sent to you by facsimile 22 April 2014 by Western Watershed Projects, namely: "Appeal and Request for Stay of the Decision Record and Rationale for The Eldorado Valley Tortoise Translocation (DOI-BLM-NV-S010-2014-0038-DNA)."

We are hopeful that sufficient financial support can be acquired for the Desert Tortoise Conservation Center to hold the tortoises safely until a more appropriate solution can be found.

Sincerely,

Edward L., LaRue, Jr., M.S.  
Desert Tortoise Council, Ecosystems Advisory Committee, Chairperson