



## DESERT TORTOISE COUNCIL

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To: Steve Kiggins, The Spectrum Editor, [skiggins@thespectrum.com](mailto:skiggins@thespectrum.com)

The Desert Tortoise Council (Council) appreciates this opportunity to provide input on the likely effects the Northern Corridor would have on tortoises within the Red Cliffs Desert Reserve/National Conservation Area (Reserve/NCA). The deleterious effects of roads on tortoise populations are well documented. Vehicle traffic on even unimproved dirt roads, and particularly heavily travelled paved roads and highways, results in direct mortality of tortoises; increased incidence of fire associated with vehicle traffic followed by an influx of non-native plant species in burned areas that provide no nutritional benefit to tortoises and provide conditions favorable for future wildfire; increased mortality of common desert animals resulting in higher incidences of tortoise predators, particularly common ravens and coyotes; increased access for both collecting tortoises and releasing pet tortoises into conservation areas; increased access that damages soil crusts, promotes erosion, fragments contiguous blocks of habitat, restricts animal movement and gene flow, encourages future linear development such as pipelines and transmission lines alongside the road, and promotes off-road vehicle traffic in adjacent areas.

Whereas a recent Spectrum article asserts that “Washington County has the highest density of desert tortoises anywhere in their range,” a 2012 publication by Utah Division of Wildlife Resources (UDWR) found a 41% reduction in tortoise numbers in the Reserve/NCA between 1998 and 2003. They attributed the decline to drought, wildfire, recreational use, disease, and predation. Since 2003, populations have stabilized according to UDWR. As stated above, four out of five of these impacts (all but drought) would be facilitated by development of the Northern Corridor. We note that as of 2012, 14,624 acres within the Reserve/NCA, including 25% of the tortoise critical habitat, was impacted by wildfires, so tortoises and their habitats within the Reserve/NCA have already been threatened and impaired, respectively, without development of the Northern Corridor.

Finally, and perhaps most importantly, 12,264 acres of tortoise habitat could be developed in Washington County in exchange for 18,609 acres of private and State Institutional Trust Lands to be acquired within the Reserve/NCA under the 1995 Washington County Habitat Conservation Plan. To date, 11,309 areas have been acquired with an unknown amount of habitat developed and tortoises displaced. Washington County’s conservation of these 11,300 acres±

acquired within the 62,000-acre Reserve/NCA will be impaired if the Northern Corridor is developed.

Given the known deleterious effect of roads on tortoises and habitats, the Council continues to support conservation management of the Red Cliffs Desert Reserve and National Conservation Area without development of the Northern Corridor. Development of the Northern Corridor would not result in a net benefit to tortoises, would promote a currently nonexistent threat to the federally-threatened desert tortoise, and is an incompatible use that would undermine the conservation and recovery of the desert tortoise within the Reserve/NCA by Washington County and other agencies. By developing the Northern Corridor, the promise of tortoise conservation within the Reserve/NCA envisioned by the Washington County HCP would be undermined without the possibility of regaining the tortoise habitats already lost elsewhere within the county.

Regards,

A handwritten signature in blue ink, appearing to read "E. LaRue, Jr.", is enclosed in a light blue rectangular box.

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