



DESERT TORTOISE COUNCIL
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Via email to: Shonna_Dooman@blm.gov

RE: Decision Record and Rationale for (DOI-BLM-NV-S010-2014-0032-DNA) – Hidden Valley Tortoise Translocation

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.

The Council recently learned of the Bureau of Land Management's (BLM) decision on March 6, 2014 to authorize the U.S. Geological Survey (USGS) to implement the Hidden Valley Tortoise Translocation (Translocation) Plan as part of a defined research project, DOI-BLM-NV-S010-2014-0032-DNA (Drake et al. 2013), in Clark County, Nevada. Though we understand we missed the official public comment period for the Translocation, and in general we support the research project, we still have concerns about the execution of the proposed research. We sincerely hope that these concerns will be addressed during implementation of the Translocation.

In our comment on the Environmental Assessment (EA), on which the record and rationale of your decision were based (DOI-BLM-NV-S010-2012-0097-EA) (BLM 2012), we outlined several specific concerns about the genetic identity of the tortoises at DTCC (hybrids, tortoises from far localities, tortoises of unknown origin) and stated our concern that, at this time, translocations must avoid genetic mixing. We urged the BLM to genetically test all tortoises that are to be translocated, as well as those in the recipient population, to determine whether the translocatees are released into an appropriate locality. We understand that "several" of the tortoises to be used will be derived from wild tortoises that originated from nearby Coyote Springs Valley, and we agree that these individuals would be appropriate translocatees for the Hidden Valley release. The word "several" does not inform us as to how many of the 30 tortoises are known to be local.

Additionally, the Plan states:

"Hidden Valley is located approximately 58 km north-northeast of the DTCC. Moving tortoises within 175 km of the DTCC ensures that the vast majority of tortoises will remain in a genetic unit equivalent to that of their origin (actual locality of genetic origin, not that of the area immediately surrounding the DTCC) (USFWS 2012f)."

This suggests that the vast majority of the tortoises at the DTCC, or at least those selected for this research project, are known to have an actual genetic origin within the region of the release site. However, Edwards and Berry (2013) have shown that many of the tortoises at the DTCC do NOT come from the Las Vegas Valley area but from farther away, and that some represent offspring of captive parents from different localities. The DTCC also probably harbors some unrecognized species hybrids. The plan should have made it clear exactly what is known about the original locality of all of the 30 tortoises to be released and at least assure that no tortoise hybrids will be involved. It is our position that the genetic integrity of the resident population should not be allowed to be compromised by the introduction of tortoises of unknown origin, and we strongly recommend that all translocated tortoises be genetically tested and compared to the same tests applied to the recipient population to ensure that only appropriately-identified animals are selected for the translocation effort.

The Council is additionally concerned that the plan does not address issues of predation risk or carrying capacity of the release site, nor of the effect that drought may have on these issues. We are especially concerned about the combined and synergistic effects of drought and predator risk, and we urge that these factors be carefully considered as part of the research design.

In conclusion, we believe that great care should be taken to avoid a genetic admixture to the resident population, that predation risk and drought are evaluated as part of the study and throughout the monitoring period, and that a contingency plan be developed to deal with unexpected issues.

Regards,



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

Desert Tortoise Council, Ecosystems Advisory Committee Chairperson

Literature Cited

Drake, K., K. Nussear, T. Esque, R. Averill-Murray, and K. Field. 2013. Translocation Plan for Hidden Valley, Clark County, Nevada. Dated July 13, 2013.

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