



DESERT TORTOISE COUNCIL

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Via email only

15 March 2017

Aaron Rutledge
Bureau of Land Management, Las Vegas Nevada Field Office
Email: arutledge@blm.gov

RE: Desert Tortoise (*Gopherus agassizii*) Translocation Throughout the Species Range within the Southern Nevada District and Caliente Field Office, Nevada, DOI-BLM-NV-S000-2017-0002-EA, Population Augmentation (BLM 2017)

Dear Mr. Rutledge,

The Desert Tortoise Council (Council) is a 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 1975 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 geographic range.

We appreciate this opportunity to provide the following comments on the above-referenced Draft Environmental Assessment (DEA).

1). We note on page 6 of the DEA that 369 adult and 378 juvenile (<180 mm carapace length) tortoises were translocated to the Trout Canyon translocation site, and that subsequent surveys found 204 tortoises in 2014 and 111 tortoises in 2015. Since this is a sampling effort, did U.S. Fish and Wildlife Service (USFWS) apply its 2010 formula to estimate the density of tortoises based on these sample sizes? Absent this information, we cannot tell how many of the 747 translocated tortoises are still alive. Nor does the DEA indicate how many of the 315 tortoises found in 2014 and 2015 were translocated, assuming the translocated tortoises were marked and could be later identified?

2). Page 9 of the DEA states, “The translocation of tortoises will not result in additional restrictions or deviations from current multiple use management for the area, and BLM [Bureau of Land Management] will continue to manage the resources in the area as required in BLM manuals, policies, and regulations.” Does this mean that the translocation areas may be subsequently used for incompatible uses, such as solar development, cattle grazing, or other intensive uses? It is not clear from the DEA that these types of land uses are prohibited in the chosen recipient sites. The Council feels that if these translocations are truly being implemented to augment tortoise populations and promote recovery, then translocated tortoises must occur in regions where multiple use management by the BLM is consistent with recovery actions.

3). We note on page 13 of the DEA that 9 live tortoises and 111 dead tortoises were found at Stump Springs during the distance sampling surveys conducted in the Fall of 2014. Whereas this is cited as a supporting reason for releasing translocated tortoises into the area, we are concerned that the DEA fails to indicate how resident tortoises died. We note on page 14, that two of the five tortoises screened (40%) had less than ideal body condition and that mild clinical signs were observed in “this small group of tortoises,” although the percent of the five tortoises is not indicated. This seems to indicate that even the small sample size of five living tortoises were not particularly healthy. Will translocated tortoises be introduced into inferior habitats or diseased populations? Why have so many tortoises died and won’t the translocated tortoises be subjected to the same factors that resulted in heightened tortoise mortality? Until these factors are better understood, the Council believes that additional surveys and studies are needed before translocating 378 tortoises into the Stump Springs area.

4). On page 15 of the DEA, we note that at the 31,405-acre Hidden Valley II translocation site “... some of the research animals move into and out of the eastern edge of the U.S. Fish and Wildlife Service’s Desert National Wildlife Refuge [DNWR].” Given that there is an ongoing Legislative Environmental Impact Statement (LEIS) to transfer management of the DNWR from the USFWS to the Air Force, will new management adversely affect any tortoises translocated into this area? The DEA does not acknowledge that the DNWR is proposed for removal from USFWS management or how new management may affect translocated tortoises.

5). Table 3 on page 15 includes two statements with regards to pathogens in the recipient population, including the following: “This indicates that *M. agassizii* is fairly common to populations in southern Nevada and that inadvertent release of an infected tortoise from other areas around Clark County to Hidden Valley would not introduce a novel pathogen to the population.” Is it possible that the 13% incidence of *M. agassizii* in the resident tortoise population may be the reason for heightened declines, and exposing supposedly healthy translocated tortoises (see first full paragraph on page 25 of the DEA) to diseased animals is an unacceptable risk? As written, the DEA finds it acceptable that no new pathogens will be introduced by the translocated tortoises but does not seem to consider the exposure of healthy translocated tortoises to pathogens in the resident population as being problematic.

6). With regards to the Stump Springs and Hidden Valley II monitoring plans outlined on pages 18 and 19, why aren’t a portion of the 50 tortoises released into the Stump Springs area being monitored by radio telemetry, as they would be in Hidden Valley II? Translocating 50 tortoises into Stump Springs for five years with a subsequent initial visit in 2022 to judge the efficacy of

the translocation effort does not allow for immediate adaptive management (as given in Section 2.1.5 of the DEA) or an assessment of tortoise mortality during active translocation. It would seem that if a substantial number of the first 10 or 20 tortoises translocated into Stump Springs in the first two years died, it would be important information to determine if the remaining 30 tortoises should also be introduced. The Final EA should be more definitive about how long the tortoises would be monitored at Hidden Valley II. In two places in Section 2.1.3.2, it says that monitoring will occur in “subsequent years” and there is an indication that transmitters will be changed at least three years post release, but there is no statement as to how long translocation success will actually be monitored.

The intent to radio-track tortoises, as given in the Hidden Valley II monitoring plan, is appropriate for the Stump Springs effort as well. Why are disparate approaches being considered? Shouldn't the Stump Springs translocatees also be tracked with radio telemetry? Similarly, why aren't the vegetation transects intended for Hidden Valley II not also being conducted in Stump Springs? The Council feels that the best, consistent approach is warranted for both translocation efforts and that the DEA does not explain the differential treatment of the two study areas. We also feel that monitoring should address potential predators, coyotes and common ravens in particular, on translocated tortoises.

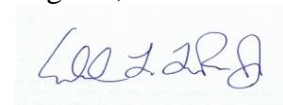
7). The Council considers Section 4.3, Cumulative Effects of the DEA to be deficient and recommend the following analyses be included in the Final EA:

a). The single paragraph on page 27 generally describing translocation as an augmentation tool is generic and must be supplemented by data that indicate the success and/or failure of previous translocation efforts in southern Nevada. For example, during her presentation in 2016 at the Council's Symposium, Linda Allison reported on the monitoring efforts at the Large Scale Translocation Site (LSTS) and indicated that a majority of the 9,000 tortoises translocated there cannot be found, however none of her data are described either in the background information (Section 1.2.1) or in the Cumulative Effects section (4.3). Section 1.2.1 also generally describes translocation efforts at Trout Canyon, El Dorado Valley, and Hidden Valley as background information with a few observations of success and failure on page 7. However the Council believes that previous translocation efforts also constitute cumulative effects and that discussions in Section 1.2.1 and/or 4.3 are insufficient and should be expanded.

b). Given that some translocated tortoises may be affected by future management of the DNWR, this project and its potential effects should be analyzed in the Cumulative Effects section of the Final EA since this land transfer to the Air Force is reasonably foreseeable.

We appreciate this opportunity to comment and hope information presented herein helps the BLM finalize this Draft Environmental Assessment.

Regards,



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

Literature Cited

- U.S. Bureau of Land Management. 2017. Environmental Assessment DOI-BLM-NV-S000-2017-0002-EA. Desert tortoise (*Gopherus agassizii*) translocation throughout the species range within the Southern Nevada District and Caliente Field Office, Nevada. Prepared by the Las Vegas Field Office of the BLM. Las Vegas, NV.
- U.S. Fish and Wildlife Service. 2010. Preparing for any action that may occur within the range of the Mojave desert tortoise (*Gopherus agassizii*). USFWS Desert Tortoise Recovery Office. Reno, NV.