



DESERT TORTOISE COUNCIL

4654 East Avenue S #257B

Palmdale, California 93552

www.deserttortoise.org

eac@deserttortoise.org

Via email only

31 May 2021

Chris Otahal, Wildlife Biologist
Bureau of Land Management, Barstow Field Office
2601 Barstow Road
Barstow, California 92311
BLM_CA_AmargosaWSR_Plan@blm.gov

RE: Amargosa Wild and Scenic River Comprehensive River Management Plan

Dear Mr. Otahal,

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 desert tortoise species. Established in 1975 to promote conservation of tortoises in the deserts of the southwestern United States and Mexico, the Council routinely provides information and other forms of assistance to individuals, organizations, and regulatory agencies on matters potentially affecting desert tortoises within their geographic ranges.

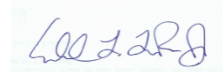
We appreciate this opportunity to provide comments on the above-referenced project. Given the location of the proposed project in habitats likely occupied by Mojave desert tortoise (*Gopherus agassizii*) (synonymous with Agassiz's desert tortoise), our comments pertain to enhancing protection of this species during activities authorized by the Bureau of Land Management (BLM). Please accept, carefully review, and include in the relevant project file the Council's following comments and attachments for the proposed project.

Although the Council has repeatedly asked BLM to contact us for projects on public lands (<https://www.dropbox.com/s/xaqfqb20ul94ak8/BLM%20CDCA%20District%20Manager%20DTC%20as%20an%20Affected%20Interest.11-7-2019.pdf?dl=0>), we were contacted by a third party regarding this project, not by the BLM.

Given the location of Amargosa River in habitats likely occupied by Mojave desert tortoise, we ask that the BLM identify management actions in the comprehensive river management plan (CRMP) that would benefit conservation of this imperiled species. We would specifically like to see an educational component in the CRMP that would inform the recreating public and future project proponents of tortoise conservation in the project area. Further, we expect the BLM to access the most recent information about the status of desert tortoises (Allison and McLuckie, U.S. Fish and Wildlife Service 2017, etc.) and document that information in the environmental document(s) completed for this project.

We appreciate this opportunity to provide input and look forward to reviewing the draft CRMP when released to the public. Herein, we reiterate that the Desert Tortoise Council be identified as an Affected Interest for this and all other BLM projects that may affect species of desert tortoises, and that any subsequent environmental documentation for this particular project is provided to us at the contact information listed above. We also ask that you acknowledge receipt of this letter as soon as possible so we can be sure our concerns have been received by the appropriate parties.

Regards,



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

Literature Cited

- Allison, L.J. and A.M. McLuckie. 2018. Population trends in Mojave desert tortoises (*Gopherus agassizii*). *Herpetological Conservation and Biology* 13(2):433–452.
- U.S. Fish and Wildlife Service. 2017. Status of the desert tortoise and critical habitat (dated 11 October 2017). Unpublished report prepared by the Desert Tortoise Recovery Office of the USFWS. Reno, NV. 24 pages.