



DESERT TORTOISE COUNCIL

3807 Sierra Highway #6-4514

Acton, CA 93510

www.deserttortoise.org

eac@deserttortoise.org

12 February 2024

Attn: The Honorable Pete Buttigieg
United States Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

RE: Formal support for the Coyote Springs Wildlife Crossings Pilot Program

Dear Mr. Buttigieg,

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.

The Mojave desert tortoise is among the top 50 species on the list of the world's most endangered tortoises and freshwater turtles. The International Union for Conservation of Nature's (IUCN) Species Survival Commission, Tortoise and Freshwater Turtle Specialist Group, now considers the Mojave desert tortoise to be Critically Endangered (Berry et al. 2021), "... based on population reduction (decreasing density), habit loss of over 80% over three generations (90 years), including past reductions and predicted future declines, as well as the effects of disease (upper respiratory tract disease/mycoplasmosis). *Gopherus agassizii* (*sensu stricto*) comprises tortoises in the most well-studied 30% of the larger range; this portion of the original range has seen the most human impacts and is where the largest past population losses had been documented. A recent rigorous rangewide population reassessment of *G. agassizii* (*sensu stricto*) has demonstrated continued adult population and density declines of about 90% over three generations (two in the past and one ongoing) in four of the five *G. agassizii* recovery units and inadequate recruitment with decreasing percentages of juveniles in all five recovery units."

This status, in part, prompted the Council to join Defenders of Wildlife and Desert Tortoise Preserve Committee (Defenders of Wildlife et al. 2020) to petition the California Fish and Game Commission in March 2020 to elevate the listing of the Mojave desert tortoise from threatened to endangered in California. In its status review, California Department of Fish and Wildlife (CDFW) (2024) stated: “At its public meeting on October 14, 2020, the Commission considered the petition, and based in part on the Department’s [CDFW] petition evaluation and recommendation, found sufficient information exists to indicate the petitioned action may be warranted and accepted the petition for consideration. The Commission’s decision initiated this status review to inform the Commission’s decision on whether the change in status is warranted.”

Importantly, in their February 2024 status review, CDFW concluded: **“The Department’s recommendation is that uplisting the Mojave Desert Tortoise is warranted.”** Receipt of this [status review] report is to be placed on the agenda for the next available meeting [expected in April 2024] of the Commission after delivery [at the February meeting]. At that time, the report will be made available to the public for a 30-day public comment period prior to the Commission taking any action on the petition.”

We are writing in support of an application made by the Nevada Department of Transportation (NDOT) for the U.S. Department of Transportation (DOT) – Rebuilding American Infrastructure with Sustainability and Equity (RAISE) Grant Program for the Coyote Springs Wildlife Crossings Project.

The Coyote Springs Project would construct tortoise fencing along 33 miles of US 93 adjacent to critical desert tortoise habitat. This stretch of highway is the last segment of critical habitat to remain un-fenced in southern Nevada. The tortoise population within the project area is healthy and not suffering from raven predation or disease. Wildlife-vehicle collisions are the primary mortality facing this tortoise population.

This project is supported by many agencies and organizations to aid in the continued recovery of the desert tortoise population in southern Nevada. Additionally, the State of Nevada recently established provisions for wildlife crossings with Assembly Bill 112 and the creation of the Wildlife Crossings Account in the State General Fund.

The completion of the Coyote Springs Project would provide many tangible benefits to the desert tortoise population within southern Nevada. We respectfully ask for you to give full and fair consideration to NDOT’s application and enthusiastically support implementing the pilot program.

Respectfully,



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

Literature Cited

- Berry, K.H., L.J. Allison, A.M. McLuckie, M. Vaughn, and R.W. Murphy. 2021. *Gopherus agassizii*. The IUCN Red List of Threatened Species 2021: e.T97246272A3150871. <https://dx.doi.org/10.2305/IUCN.UK.2021-2.RLTS.T97246272A3150871.en>
- [CDFW] California Department of Fish and Wildlife. 2024. Status Review for Mojave Desert Tortoise (*Gopherus agassizii*). Report to the California Fish and Game Commission. California Department of Fish and Wildlife, 715 P Street, Sacramento, CA 95814. 228 pp. with appendices. <https://fgc.ca.gov/CESA#adt>
- Defenders of Wildlife, Desert Tortoise Preserve Committee, and Desert Tortoise Council. 2020. A Petition to the State of California Fish And Game Commission to move the Mojave desert tortoise from listed as threatened to endangered. Formal petition submitted 11 March 2020. https://defenders.org/sites/default/files/2020-03/Desert%20Tortoise%20Petition%203_20_2020%20Final_0.pdf