

DESERT TORTOISE COUNCIL

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27 April 2023

Attn: The Honorable Raul Ruiz, M.D.
U.S. House of Representatives
2342 Rayburn House Office Building
Washington, DC 20515

RE: Support for Designation of Chuckwalla National Monument and Joshua Tree National Park Expansion

Dear Dr. Ruiz,

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), habitat 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). 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." It is one of three turtle and tortoise species in the United States to be critically endangered.

This status, in part, prompted the Council to join Defenders of Wildlife and Desert Tortoise Preserve Committee (Defenders 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.

We appreciate the grassroots effort to establish the Chuckwalla National Monument and expand Joshua Tree National Park, and fully support the designation of this national monument and expansion of the park. When established, the Chuckwalla National Monument would provide many cultural, scientific, historic, social, educational, and economic benefits. While some of these are not reasons for designating a national monument under the Antiquities Act, all these reasons demonstrate the breath of benefits the American people would gain from the designation and management of these lands as a national monument.

To touch on some of these reasons, the monument designation would help protect:

- the ancestral homelands, sacred sites, and traditions including native plants and animals of the Cahuilla, Quechan, Serrano, Chemehuevi, and Mojave tribes;
- World War II historical sites and Bradshaw Trail, a 19th century trade route;
- more than 100 parcels that have been purchased by the Mojave Desert Land Trust that are being proactively managed for desert tortoise and other resource conservation; and
- many places that the public enjoys for outdoor recreation activities, and ensure they will be available for current and future generations to experience and enjoy.

Monument designation would also:

- enhance outdoor recreation opportunities for the local population as well as attracting visitors to the area; and
- increase the education of the public about the natural and cultural resources of the area and instill a greater appreciation of these resources from their experiences at the Monument.

The expansion of Joshua Tree National Park by way of a National Park Service (NPS)-managed monument would place that land in as solid a state of protection as possible for wildlife including but not limited to the desert tortoise and desert bighorn sheep, and provide a stunningly beautiful buffer of protected land to the park's existing eastern boundary. This expansion would protect thousands of acres of land designated as Desert Tortoise Critical Habitat by U.S. Fish and Wildlife Service (USFWS 1994a) that currently lack sufficient, reserve-level protection.

As stated above, the Council works to conserve tortoises in the southwestern United States and Mexico. California has only one species of tortoise, the Mojave desert tortoise, which is the state reptile of California.

The proposed boundary of the Chuckwalla National Monument encompasses much of the Chuckwalla population of the Mojave desert tortoise and the Chuckwalla critical habitat unit, referred to as the Chuckwalla Tortoise Conservation Area (TCA) (BLM 2016). The Chuckwalla TCA is the largest TCA, comprising 11 percent of the total area of TCAs.

The status and trend of the Chuckwalla tortoise population is not optimistic. Between 2004 and 2014, this population of adult tortoises declined more than 37 percent (Allison and McLuckie 2018). The density of adults was 3.3 tortoises per km² which is below the 3.9 tortoises per km² needed for a population to be viable (USFWS 1994b). By 2021, the density declined to 2.6 tortoises per km² (USFWS 2022).

Unfortunately, the demographic status and trends for the tortoise at most of the nine other TCAs in California has followed a similar trend. All eight populations of Mojave desert tortoise occurring on lands managed by the Bureau of Land Management (BLM) in California declined from 2004 to 2014 (Allison and McLuckie 2018). Seven of these populations have densities below population viability (USFWS 1994b, Allison and McLuckie 2018). Such steep declines in the density of adults are only sustainable if there are suitably large improvements in reproduction and juvenile growth and survival. However, the proportion of juveniles has not increased anywhere in the range of the Mojave desert tortoise since 2007 (Allison and McLuckie 2018).

Currently, most of the land within the proposed Chuckwalla National Monument is managed by the BLM as part of the California Desert Conservation Area (CDCA). Congress established the CDCA in 1976 under the Federal Land Policy and Management Act (FLPMA) (Public Law 94-579) “to provide for the immediate and future protection and administration of the public lands in the California desert within the framework of a program of multiple use and sustained yield, and the maintenance of environmental quality.” Since the first CDCA Resource Management Plan (CDCA Plan) was adopted by the BLM in 1980, it has been amended several times to provide for increased human development in this conservation area. The most recent amendment was the Desert Renewable Energy Conservation Plan (BLM 2016) that authorized development of large, mostly undisturbed areas in the CDCA for development of renewable energy. Thus, BLM can change the management of the lands in the CDCA, including the lands within the proposed Chuckwalla National Monument, at any time, as it has done in the past to allow for new or increased development.

The Council is excited about and supports the national monument designation for the reasons listed above and especially because of the potential benefits that would result for the tortoises in the Chuckwalla TCA. In the rangewide population monitoring of the tortoise that occurs in California’s ten TCAs, the only one that increased in density and numbers since 2004 is the population in Joshua Tree National Park — increasing 178 percent in 10 years. These data indicate that the management prescriptions implemented on national park lands (and potentially national monument lands) would benefit the tortoise. Thus, we believe that monument designation and its associated management would likely substantially slow down and eventually reverse the downward multi-decade decline of tortoise densities and numbers in the Chuckwalla tortoise population.

As to who should manage the Chuckwalla National Monument when it is designated, the Council believes this honor should be given to the NPS. Our reasons for this recommendation are:

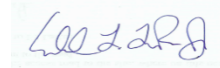
- for convenience and economy, the proposed monument abuts the southern boundary of Joshua Tree National Monument. The NPS has offices and management resources closer to the proposed national monument than the nearest BLM field office, which is in El Centro;

- The NPS has a history and tradition of managing national parks and monuments to conserve their cultural and natural resources while providing excellent opportunities for outdoor recreation; and
- The NPS has a history and tradition of implementing effective education and interpretation programs to the public on the values of natural and cultural resources.

For these reasons, the Council supports the NPS as the agency that would manage the Chuckwalla National Monument.

Should you have any questions regarding our reasons for supporting the designation of the Chuckwalla National Monument and NPS management, please contact us at the email address in our letterhead.

Respectfully,



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

Literature Cited

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