

DOCKET

09-RENEW EO-1

DATE _____

RECD. NOV 28 2011

DRECP Preliminary Conservation Strategy

Comment Form

Commenter (Your Name)	Comment #	Comment Location:					Comment (e.g., organization, content, grammatical comments)
		Chapter	Section #	Page #	Paragraph	Paragraph (from top)	
Sidney Silliman on behalf of Desert Tortoise Council (P.O. Box 1568, Ridgecrest, CA 93556) re Docket 09-RENEW EO-01	1	2	Table 2.1-1	2-2 to 2-3			While the PSC map is an "interim product," it is not premature to state that the fundamental requirement for the conservation and recovery of listed species is the protection of high-quality habitat. In the judgment of the Desert Tortoise Council, the following lands must be protected to ensure extensive, unfragmented habitats for the desert tortoise: (1) the Desert Tortoise Research Natural Area (DTRNA); (2) Joshua Tree National Park and the southern portion of Death Valley National Park; (3) all lands designated as critical habitat in 1980 and 1994; (4) all lands included in Desert Wildlife Management Areas (DWMAs) as designated by Bureau of Land Management's three coordinated management plans in California. (5) all private lands that are in-holdings in the DTRNA, Joshua Tree National Park (tortoise habitat only), and within critical habitat; (6) lands not included within the 1980 and 1994 critical habitat designations but subsequently found to support significant populations of tortoises; (7) lands adjacent to critical habitat and for which development would have moderate to severe adverse impacts; (8) lands that serve to connect the DTNRA, critical habitat or parts of critical habitat, or the National Parks as "connecting corridors" with similar habitats; and (9) lands at elevations of 3,800-5,000+ feet outside critical

						habitat and currently with low densities of tortoises as these lands are likely to contain suitable habitat in the next 50 to 100 years with climate change. Any plan that would facilitate development of the above habitats would detract seriously from the recovery of the desert tortoise.
Sidney Silliman on behalf of Desert Tortoise Council (P.O. Box 1568, Ridgecrest, CA 93556)	2	2	Figure 2.1	2-4		The boundary for any RESA north of Barstow should be well away from the Superior-Cronese Critical Habitat Unit and DWMA. Likewise, the boundary for any RESA around the eastern portion of Interstate 10 should be as far from the Chuckwalla Critical Habitat Unit and DWMA as possible.
Sidney Silliman on behalf of Desert Tortoise Council (P.O. Box 1568, Ridgecrest, CA 93556)	3	2	Table 2.1-2	2-8		The “Narrow Range Species Elements” portion of Table 2.1-2 should include the Mojave River Vole (<i>Microtus californicus mohavensis</i>), a California Species of Special Concern. Its entire range is within the DRECP planning area.
Sidney Silliman on behalf of Desert Tortoise Council (P.O. Box 1568, Ridgecrest, CA 93556)	4	2	2.2.2.3	2-35		DTC concurs with the stated intent to incorporate goals, objectives and conservation measures from the USFWS Recovery Plan for the desert tortoise (and from the plans for other listed species) into the DRECP conservation strategy. Recovery of the Mojave population of desert tortoise (<i>Gopherus agassizii</i>) should be a primary planning goal of the DRECP. The USFWS recovery strategy for the tortoise should be detailed in the text of the DRECP. Actions that would “protect existing populations and habitat” are discussed in the Revised Recovery Plan (2011, 67 to 78). The 1994 Recovery Plan specifies both recommended regulations and recommended actions for desert tortoise recovery (see pages 56 to 61).
Sidney Silliman on behalf of Desert	5	2	2.2-5	2-39		The DRECP should acknowledge and anticipate changes in the status of the desert tortoise for several reasons.

Tortoise Council (P.O. Box 1568, Ridgecrest, CA 93556)						First, the split of the former <i>Gopherus agassizii</i> into two species – <i>Gopherus agassizii</i> and <i>Gopherus morafkai</i> – by Murphy et al. (2011) supports and should require a reevaluation of the overall status of the desert tortoise, especially as more taxonomic changes are anticipated due to ongoing genetic analyses of the Arizona and Sonoran populations. Second, although only the Mojave population is listed as “threatened” while the Arizona population is currently identified as “warranted but precluded,” a change in the federal listings is possible after DRECP approval. Third, our inability to consider that the Arizona-Sonora species of tortoise provides a buffer for the threatened species <i>Gopherus agassizii</i> brings the Mojave tortoise into a more serious jeopardy situation; for that reason alone, the desert tortoise requires a higher level of protection.
Sidney Silliman on behalf of Desert Tortoise Council (P.O. Box 1568, Ridgecrest, CA 93556)	6	3	Table 3.2-1	3-7 to 3-9		The Mojave Fringe-toed Lizard (<i>Uma scoparia</i>) should be included as a Covered Species under the DRECP in that it is a BLM Sensitive Species and a California Species of Special Concern. Its entire range is within the DRECP planning area. The species is already suffering from the negative impacts of utility-scale renewable energy projects in the desert.

Sidney Silliman on behalf of Desert Tortoise Council
(P.O. Box 1568,
Ridgecrest, CA
93556)

7

6

Section
6.1

3.2-1

6-2

Although it may be that the DRECP has progressed beyond what the independent science advisor (ISA) group reviewed, the REAT agencies should adopt the “no regrets” strategy advocated by the ISA in its Recommendations Report (2010, iii), such as “*siting developments in already disturbed areas*” in the near term until more refined analyses become available to guide more difficult decisions. The DRECP should only develop lands that are not habitat or lands that are degraded, such as fallow agricultural lands and vacant lands surrounded by urban development. The fragmentation of regionally

important habitats should not be facilitated by the DRECP.

