

DESERT TORTOISE COUNCIL

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via California State Parks comment portal and email

April 25, 2020

Sixto J. Fernandez, Grants Manager
Grants and Cooperative Agreements Program
California State Parks, Off-Highway Motor Vehicle Recreation Division
1725 23rd Street, Suite 200
Sacramento, CA 95816
Sixto.Fernandez@parks.ca.gov

RE: Letter of Support for the Preliminary Grant Application by the Desert Tortoise Preserve Committee for Monitoring and Restoration of Areas Adjacent to Desert Tortoise Research Natural Area

Dear Mr. Fernandez:

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

This is a Letter of Support to fund the Preliminary Grant Application submitted by the Desert Tortoise Preserve Committee, Inc. (DTPC) for Monitoring and Restoration of Areas Adjacent to the Desert Tortoise Research Natural Area (DTRNA). Funding this request would enable the DTPC to monitor (including photo-monitoring) conservation lands to assess restoration progress, install new/replace damaged educational signs, install directional trail signs to direct off-highway vehicle (OHV) use to appropriate routes, implement trail camouflage in areas of high OHV incursions, repair fences, and remove invasive plant species identified during monitoring. These restoration, monitoring, education, and surveillance measures would occur on approximately 4,600 acres of conservation lands that the DTPC owns and manages directly adjacent to the DTRNA. These measures would help prevent future unauthorized OHV activities that result in long-term damage to desert environments and public resources including the federal and State-threatened Agassiz's desert tortoise (*Gopherus agassizii*) (synonymous with "Mojave desert tortoise") and its habitat.

Below are the reasons we strongly request that you fund this grant application:

1. The Preliminary Grant Application for Monitoring and Restoration of Areas Adjacent to DTRNA describes a project methodology that enables the DTTPC to quantify their actions and accomplishments. It includes the submittal of detailed reports documenting the actions taken (e.g., quantity of fencing, signs installed/replaced, quantity and locations of restoration activities using GIS applications, etc.) and compares those with previously collected/identified information specific to individual project areas, such as known areas of incursion or known areas of invasive species occurrence. This approach will provide the managers of the Grants and Cooperative Agreements Program with documentation of the success of past and current efforts. Thus, the managers will have information on whether the methods implemented by the DTTPC are successful. This will help the managers determine the value of funding similar grant proposals in the future.

2. The DTTPC has a history of accomplishing project goals and objectives with funds from grant sources. In the past, the DTTPC has demonstrated that when awarded funds from the Off-Highway Motor Vehicle Recreation's Grants and Cooperative Agreements Program, they spent those funds effectively and contributed to improving desert tortoise habitat, which benefits the tortoise and other species.

3. This project will accomplish its goals efficiently. It will prevent future damage to desert habitats and assist in the restoration of native flora. With the DTTPC's request of \$126,179.60 for monitoring and restoring 4,600 acres, this is less than \$28 an acre. Because the funds are for monitoring and restoration for two years, this is \$14 per acre per year. We also appreciate that the DTTPC is providing \$20,815.00 of its own funds, which signifies their commitment to the work and their belief in its intrinsic value.

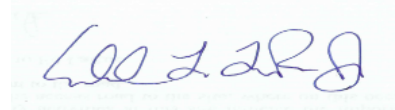
4. The subject properties in areas adjacent to the DTRNA are part of an Area of Critical Environmental Concern/Tortoise Conservation Area and the Fremont-Kramer Critical Habitat Unit for the Mojave desert tortoise. Thus, restoration activities are important for the tortoise and essential habitats as they will occur in areas designated for the long-term conservation of the federally and state-threatened tortoise, designated critical habitat. Other species that will directly benefit include the state-threatened Mohave ground squirrel (*Xerospermophilus mohavensis*) and special status species including western burrowing owl (*Athene cunicularia*) and American badger (*Taxidea taxus*), among others.

5. Implementation of the restoration activities in the DTTPC's Preliminary Grant Application is important to the long-term management and conservation of the DTRNA. This is because the lands to be restored and monitored with monies from this grant application are immediately adjacent to the DTRNA. This area links the DTRNA to other lands with a conservation management designation for federally and state-threatened species and special status species.

6. Management by the DTTPC within and adjacent to the DTRNA has yielded positive results for the Mojave desert tortoise (Berry et al 2014). This small but well managed area within the Fremont-Kramer Critical Habitat Unit is the only stratum in California with stable-to-increasing tortoise populations for the past decade (Allison 2017, Allison and McLuckie 2018). The past funding of DTTPC projects by the Off-Highway Motor Vehicle Recreation's Grants and Cooperative Agreements Program has contributed to this management success.

For these reasons, we believe that the Preliminary Grant Application by the Desert Tortoise Preserve Committee for Monitoring and Restoration of Areas Adjacent to Desert Tortoise Research Natural Area should be fully funded.

Regards,

A handwritten signature in blue ink, appearing to read "Ed L. LaRue, Jr.", is centered on a light blue rectangular background.

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

cc: Desert Tortoise Preserve Committee, Inc. dtpc@pacbell.net

Allison, L. J. and A. M. McCluckie. 2018. Population trends in Mojave desert tortoises (*Gopherus agassizii*). *HerpConBio* 13(2): 433-452.

Allison, L. J. 2017. Range-wide monitoring of the Mojave desert tortoise (*Gopherus agassizii*): 2017 annual reporting. US Fish and Wildlife Service, DTRO, Reno Nevada. 39 pp.

Berry, K.H., L.M. Lyren, J.L. Yee, and T.Y. Bailey. 2014. Protection benefits desert tortoise (*Gopherus agassizii*) abundance: The influence of three management strategies on a threatened species. *Herpetological Monographs*, 28(1):66-92. 2014.