



**Desert Tortoise Preserve Committee, Inc.**  
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August 7, 2013

James G. Kenna  
State Director  
Bureau of Land Management  
California State Office  
2800 Cottage Way, Suite W-1623  
Sacramento, CA 95825-1886



Dear Mr. Kenna:

As active and engaged stakeholders working in the California desert, we are aware of the Desert Renewable Energy Conservation Plan and the process to identify and designate certain lands in the California Desert Conservation Area (CDCA) to be added to the National Landscape Conservation System (National Conservation Lands).

We recognize the historic significance of this opportunity for the BLM to significantly expand its system of National Conservation Lands and we urge that the agency strongly consider the opinion of stakeholder groups like ourselves in identifying which lands to designate.

For almost 40 years, the Desert Tortoise Preserve Committee, Inc. (DTPC) has been promoting the welfare of the desert tortoise in its native wild state through land acquisition and management, scientific research, and educational outreach. Considering the designation criteria in the Omnibus Public Land Management Act of 2009, which states that the purpose of the National Conservation Lands is to “conserve, protect, and restore nationally significant landscapes that have outstanding cultural, ecological, and scientific values for the benefit of current and future generations,” we offer the following recommendations for specific lands to include in the National Conservation Lands system.

1) Desert Tortoise Research Natural Area (DTRNA) – The DTRNA is a very important site, not only for the conservation of high quality habitat for the desert tortoise and other sensitive desert species, but also for scientific research, educational outreach, and contemplative recreation. Since it was first established in the 1970’s to protect habitat supporting some of the highest densities of desert tortoises observed in their range, the DTRNA has been protected by special designations and important management actions. The protective boundary fencing around the perimeter of the DTRNA has effectively prevented vehicle use and livestock grazing within the area for over 30 years. This level of protection provides conservation and research opportunities that cannot be found elsewhere in the western Mojave Desert. Multiple studies have indicated that the DTRNA contains significantly higher densities of tortoises<sup>1,2</sup> and higher quality habitat than on adjacent BLM-managed lands and private lands.<sup>1,3,4</sup> These and other important studies conducted at the DTRNA help inform adaptive land management and species recovery strategies. Furthermore, the DTRNA is the site of a very active educational outreach program.

2) Other BLM lands in Fremont Valley and the Rand Mountains: For landscape-level conservation and better connectivity among desert tortoise populations in the western portion of their range, the DTPC also recommends inclusion of BLM lands within the Fremont Valley and Rand Mountains that would connect the DTRNA to Red Rock Canyon State Park and the El Paso Mountains. With the anticipated impacts of climate change, conservation of intact habitat corridors has become increasingly important. Ideally,

protection of this important corridor would continue north, including portions of Indian Wells Valley along the edge of the eastern Sierra.

3) The Pilot Knob grazing allotment: Spanning from the eastern shore of Cuddeback Dry Lake to the Black Hills and continuing east through Joshua tree woodland to the boundary of China Lake Naval Air Weapons Station, the Pilot Knob grazing allotment is a unique, remote, and relatively undeveloped area. It comprises several different plant communities along an elevational gradient ranging from 2,559 to 4,547 feet. The allotment, which bridges the Golden Valley and Grass Valley Wilderness Areas, is habitat for the desert tortoise and Mohave ground squirrel, as well as several other federal and state species of concern. The allotment also encompasses sites of cultural and prehistoric significance, including the National Register listed Blackwater Well Archaeological District. Responding to a request from the BLM, the DTPC worked with The Wildlands Conservancy to purchase significant inholdings in the Pilot Knob allotment and acquire the grazing rights in 1995, with the objective of permanently retiring the allotment from grazing. As a result, there has not been any permitted grazing since 1995, and it is our understanding that the allotment will be officially retired soon. For conservation of both natural and cultural resources, this would be an important addition to the National Conservation Lands.

4) BLM lands within the Chuckwalla Desert Wildlife Management Area (DWMA): The Chuckwalla DWMA contains several valleys and mountain ranges, ranging from 400 to 4,500 feet and is noted for its diverse Sonoran Desert vegetation and rare plant species, as well as historically high-density tortoise populations. Inclusion of these lands would provide greater level of protection for important linkages between the Chocolate Mountains Aerial Gunnery Range, Orocopia and Chuckwalla Mountains Wilderness Areas, and Joshua Tree National Park.

5) BLM lands adjacent to Mojave National Preserve, within the Chemehuevi and Piute-Fenner DWMAs: These lands contain high quality desert tortoise habitat and provide linkages between the expansive bajada habitat protected by Piute Mountains and Bigelow Cholla Garden Wilderness Areas, and higher elevation tortoise habitat of Mojave National Preserve's Lanfair Valley. Conservation of intact habitat across an elevational gradient is especially important in light of anticipated climate change effects.

The lands described above are specific areas in which the DTPC has been working with the BLM, California Department of Fish and Wildlife, and other organizations to acquire and conserve important habitat for the desert tortoise and other species. Through cooperative agreements, the DTPC could partner with the BLM for coordinated management of public and private conservation lands in these areas, as it has done with the Ridgecrest Field Office to manage the DTRNA. As the DTPC continues to work towards landscape-level conservation, we encourage the BLM to use the opportunity provided through the 2009 Omnibus Public Land Management Act to add another level of protection to these and other significant conservation lands in the California Desert Conservation Area.

We are grateful for this opportunity to provide our input into which areas in the desert will be designated as National Conservation Lands, and we hope that you will seriously consider these recommendations as you and your team craft a proposed conservation strategy.

Sincerely,



Mary Kotschwar Logan  
Preserve Manager & Conservation Coordinator  
Desert Tortoise Preserve Committee, Inc.

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<sup>1</sup> Berry, K.H., L.L. Lyren, T. Bailey. 2012. A comparison of Agassiz' desert tortoise populations and habitat in the Rand Mountains, Fremont Valley, and the Desert Tortoise Research Natural Area in spring 2011. Report to the U.S. Dept. of the Interior, Bureau of Land Management, and California Department of Parks and Recreation, Sacramento, California.

<sup>2</sup> Berry, K.H., T. Shields, and L. Lyren. 2013. Management Implications of Protective Fencing: A Comparison of Desert Tortoise and Predator Populations at and near the Desert Tortoise Research Natural Area Interpretive Center Plot, Kern County, California in 2012. 35 pp.

<sup>3</sup> Brooks, M.L. 1995. Benefits of protective fencing to plant and rodent communities of the western Mojave Desert, California. *Environmental Management* 19:65-74.

<sup>4</sup> Brooks, M. 1999a. Effects of protective fencing on birds lizards, and black-tailed hares in the western Mojave Desert. *Environmental Management* 23:387-400.