

Roy C. Averill-Murray  
Desert Tortoise Recovery Coordinator  
U.S. Fish and Wildlife Service

Rebecca Jones  
Environmental Scientist  
California Department of Fish and Game

September 23, 2005

**RE: Response to Invitation to Participate in the Desert Managers Group  
– Desert Tortoise Recovery Planning and Implementation Work Group**

Dear Mr. Averill-Murray and Ms. Jones:

Defenders of Wildlife thanks you for your August 18<sup>th</sup> invitation to join the Desert Tortoise Recovery Planning and Implementation Work Group (DTRPIWG). Defenders is willing and interested in participating in this group.

As part of your invitation letter, you requested a letter describing our interest and involvement in desert tortoise recovery and a statement that Defenders supports the mission of the Work Group as outlined in the charter. This letter serves that purpose.

Defenders of Wildlife has been involved in desert tortoise conservation efforts in California since the late 1980s. We successfully petitioned to list the desert tortoise as threatened under the federal and California Endangered Species Acts. We also worked to secure key acquisitions for the desert tortoise in the Desert Tortoise Natural Area and Chuckwalla Bench Area of Critical Environmental Concern (ACEC). Additionally, Defenders contributed to the California Desert Conservation Area Plan amendments, which determine the management of the desert lands covered under the California Desert Protection Act. Defenders has recently launched a comprehensive California Desert Program which focuses on desert tortoise recovery and a locally-based effort to increase public and political support for conservation focused regionally on the West Mojave Desert. As part of this work, we are participating in the DMG Desert Tortoise Education Outreach Working Group. Earlier this year, in response to a request from the FWS Desert Tortoise Recovery Office, we submitted a letter regarding our priority recovery actions for the desert tortoise.

The stated mission of the DTRPIWG is to “Identify, plan, and coordinate implementation of desert tortoise recovery, monitoring, and research actions in the California deserts among managers, scientists, and partners across

jurisdictional boundaries.” Defenders of Wildlife supports this mission and is pleased that we will be able to participate in making it a reality.

Additionally, we have a few comments on the entire charter itself that we wish to be noted at this time. As stated in previous communications, Defenders believes that the 1994 Recovery Plan for the desert tortoise is scientifically sound and all analyses we have seen support this assertion. Along these line, the Charter itself does not elucidate the need for the current rewrite process. The charter states that the DTRPIWG efforts will “accomplish recovery goals that would be unattainable on a local scale.” I think the intent is that “would be *otherwise* unattainable on a local scale.”

Overall, it must be very clear that Defenders of Wildlife understands that it is the role of the Science Advisory Committee (SAC) to develop the recovery plan goals, objectives, and criteria. We do not believe this role would be appropriate in the DTRPIWG. We would like this to be explicitly stated in the Work Group Charter. Defenders does not have a problem with the Recovery Action Plans being included as part of the revised Desert Tortoise Recovery Plan as long as it is clear that they are in addition to the scientifically-based goals, objectives, and criteria. This portion of the document developed by the SAC that is used to inform the work reflected in the Recovery Action Plans.

I will be the appropriate representative for Defenders of Wildlife on the DTRPIWG. I have been recently informed that the October 11<sup>th</sup> meeting of the DTRPIWG has been postponed and I look forward to attending the rescheduled meeting and working with you into the future to recover the desert tortoise in California.

Sincerely,

Cynthia Wilkerson  
California Representative

Cc: Ryan Broddrick, Director, California Department of Fish and Game  
Steve Thompson, Regional Director, U.S. Fish and Wildlife Service  
Ray Bransfield, U.S Fish and Wildlife Service  
Glenn Black, California Department of Fish and Game  
U.S. Senator Diane Feinstein