cc - John Hamill

QUADSTATE
County Government Coalition

State of Arizona
County of Mohave

State of California
County of Imperial
County of Kern
County of San Bernardino

State of Nevada
County of Lincoln

State of Utah
County of Washington

Associate Members
City of Ridgecrest, CA.

September 27, 2005

Mr. Roy Averill-Murray
Desert Tortoise Recovery Office
U.S. Fish and Wildlife Service
1340 Financial Blvd.
Reno, NV 89502

Ms. Rebecca Jones
Environmental Scientist
California Dept. of Fish and Game
407 West Line Street
Bishop, CA 93514

Dear Mr. Averill-Murray and Ms. Jones:

Thank you for your letter of August 18 inviting the direct participation by the QuadState County Government Coalition in the desert tortoise work groups addressing threats and recovery in California. I apologize for the tardiness of this response. Our office did not receive it until late in August, and we wished to discuss it at our regular meeting that was not held until September 16.

While we appreciate the opportunity to participate, and certainly will, we continue to be disturbed at both the approach and organization of this important task. As organized under the leadership of the Desert Managers Group (DMG), we find that the work groups will be dominated by Federal interests who have little at stake, and may, in fact, have much to gain by simply defending the *status quo* and may wish to proceed to simply defend the existing 1994 Recovery Plan. Such an organizational structure will, in our opinion, discourage the consideration of innovative and perhaps experimental approaches to habitat management.

We also take specific exception to your seeming treatment of the Coalition in your August 18 letter as somehow representing the "use" or "land user" side of land and natural resource management. The Coalition is a public agency, and represents three county governments and one city government in California. By implication you seem to have placed the organization with off road vehicle interests to balance the two environmental interest groups to whom you also offer participation. We also find this narrowing of stakeholder interests to only four disturbing since it excludes several interests who have important resources and investment within the Mojave Desert region on no other grounds than they may not have appeared at previous Management Oversight Group (MOG) meetings. Your August 18 letter also establishes a requirement of supporting the mission of the Work Group as established by the DMG, as well as working "cooperatively and constructively" on planning. While we certainly do not wish to suggest that we, or any other group, would not work professionally, collaboratively and civilly within any public forum, we believe that such language raises a specter that honest dissent, or raising of issues or proposals that could run counter to conventional thinking, could be questioned as being non-cooperative. We suggest adoption of criteria, if you feel such is appropriate, of working "professionally and respectfully" within the group.

Our organization, at its regular meeting on September 16, reviewed participation and would like to offer a revised work group organization to you for consideration. The makeup, detailed below, is not unlike the structure which we have suggested before – s structure that would provide for agency inclusion, but limited to one representative for each, so as to provide for better balanced Federal participation. We also strongly suggest that the California Work Group clearly be under

Wally Leimgruber, Chairman
c/o Imperial County Board of Supervisors
940 W. Main Street, Room 212
El Centro, CA 92243-2871
(760) 339-4305
(760) 352-7876 FAX
wallyleimgruber@earthlink.net

Gerald Hillier
Executive Director
P.O. Box 55820
Riverside, CA 92517
(951) 683-5725
(951) 683-8544 FAX
gerryhillier@quadstate.org

the purview and guidance of the Fish and Wildlife Service, not the Desert Managers Group, so that a coordinating body without statute or regulatory foundation, and with uncertain accountability, not be interposed through which recommendations might have to be channeled.

We suggest the following structure for the California work group:

- 4 Federal representatives – one each from Bureau of Land Management, National Park Service, Fish and Wildlife Service, and Department of Defense

- 3 State of California representatives – one each from California Department of Fish and Game, CalTrans (highway department), and University of California Cooperative Extension

- 7 from stakeholder interests – one each from QuadState, Defenders of Wildlife, Center for Biological Diversity, Mojave Desert Mining Advisory Council, a utility company (electrical transmission, pipeline or telecommunications), livestock grazing, and off highway vehicle recreation.

- 5 County representatives – one each from Kern, San Bernardino, Los Angeles, Riverside and Imperial Counties. (DMG membership should not be a requirement to participate if Los Angeles and Riverside Counties should wish to become part of work group.)

We believe that while the above structure may be slightly larger than optimum, it will provide for a thorough and knowledgeable discussion of current threats to desert tortoise within the Mojave Desert Region; and certainly will be able to bring a breadth of thoughts and ideas on possible approaches to recovery.

We look forward to hearing from you regarding proceeding with the work group process. We understand the scheduled October 11 meeting has been cancelled, but will be delighted in participating in the rescheduled session. We prefer, however, that the meeting focus on moving the process forward, and have reservations about further meetings on California sub-regions as we have heard expressed by your office. We remain concerned that as we have spent the better part of 2005 focusing on organization, and little can be shown in progress toward accomplishing what we desire: a full and thorough review of the existing recovery plan and the development of a new one that relies on the current science and an evaluation of the effectiveness of actions that have been implemented over the past twenty years.

Yours truly,

Gerald E. Hillier
Executive Director

Cc: Wally Leimgruber
Steven Quarles
G. William Lamb
Robin Cochran
Jon McQuiston
Don Maben
Bill Postmus
Steve Morgon
Ted James
Steve Thompson
John Hamill
Karl McArthur