June 5, 2019

To the Clark County Commission:

We, the undersigned, are writing to express our opposition to the proposed Clark County public lands bill as written. By legislatively amending the Clark County MSHCP, the proposed bill would cut scientists and wildlife professionals out of the management of the desert tortoise in southern Nevada, allowing development to proceed without the rigorous scientific analysis necessary to ensure that the desert tortoise is not driven toward localized extinction.

The Desert Tortoise Council was established in 1975 to promote conservation of the desert tortoise in the deserts of the southwestern United States and Mexico. The Council is a non-profit organization comprised of hundreds of professionals and laypersons who share a common concern for desert tortoises in the wild and a commitment to advancing the public’s understanding of the species.

The Endangered Species Coalition is comprised of hundreds of groups with a mission is to stop the human-caused extinction of our nation’s at-risk species, to protect and restore their habitats, and to guide these fragile populations along the road to recovery. We work to safeguard and strengthen the Endangered Species Act, a law that enables every citizen to act on behalf of threatened and endangered wildlife – animals, fish, plants, and insects – and the wild places they call home.

The Center for Biological Diversity is a non-profit environmental organization dedicated to the protection of native species and their habitats in the Western Hemisphere through science, policy, and environmental law.

Friends of Sloan Canyon provides community support and educational resources that enhance the conservation, protection and public enjoyment of Sloan Canyon National Conservation Area.

Friends of Gold Butte’s mission is to promote the responsible enjoyment of the Gold Butte National Monument through education, stewardship, advocacy, and preservation of natural and cultural resources.

Western Watersheds Project is a nonprofit environmental conservation group founded in 1993 working to influence and improve public lands management, and has field offices in Idaho, Montana, Wyoming, Arizona, Utah, Nevada and California.

WildEarth Guardians protects and restores the wildlife, wild places, wild rivers, and the health of the American West. WildEarth Guardians envisions a world where wildlife and wild places are respected and valued and our world is sustainable for all beings.
Basin and Range Watch is a 501(c)(3) non-profit working to conserve the deserts of Nevada and California and to educate the public about the diversity of life, culture, and history of the ecosystems and wild lands of the desert.

The Amargosa Conservancy is dedicated to standing up for the wilds, waters, and communities of the scenic Amargosa Basin and Eastern Mojave.

The conservation of the desert tortoise has been among the guiding principles of public land management in the Mojave Desert for over twenty years. And collaborative conservation efforts, backed up by peer-reviewed science, have had great success – hundreds of thousands of acres of habitat have been preserved and tortoise populations have begun to rebound, particularly across parts of southern Nevada.

The Clark County Multi-Species Habitat Conservation Plan (MSHCP) is a good example of such an effort – the County, Bureau of Land Management, US Fish and Wildlife Service (FWS), and other relevant partners worked together to put together a plan which allowed Las Vegas to grow while ensuring that the impacts to the desert tortoise were fully mitigated. Importantly, the MSHCP was accompanied by a public, transparent environmental review process as mandated by the National Environmental Policy Act (NEPA), subject to peer-review and scientific scrutiny, and ultimately authorized by the U.S. Fish and Wildlife Service, the entity responsible for preventing the extinction of the desert tortoise.

By proposing to legislatively amend the MSHCP, Clark County is attempting to cut US Fish and Wildlife Service out of the equation. Instead of coming up with a plan in a transparent process under the auspices of NEPA and subject to scientific review and authorization by FWS, the County wants to decide on its own mitigation. This is a subversion of the protections for the tortoise mandated by the Endangered Species Act. Clark County’s proposed bill would allow politicians, not scientists, to decide the fate of the desert tortoise in southern Nevada.

We encourage the county to remove the language legislatively amending the MSHCP and take permit, and to embark on a new environmental review process wherein science will determine the mitigation for the growth of Las Vegas into tortoise habitat, and US Fish and Wildlife Service will make the final decisions about managing the tortoise into the future.

Signed,

Desert Tortoise Council
Endangered Species Coalition
Center for Biological Diversity
Friends of Sloan Canyon
Friends of Gold Butte

Western Watersheds Project
WildEarth Guardians
Basin and Range Watch
Amargosa Conservancy