

Assignment 1 –Zone 6 Boundary Adjustment

Background:

When Reserve Zone 6 was initially created, the east boundary followed the alignment of a 2-track utility road under a set a major power lines. Since then, a more current development plan (Figure 1) proposes a straightened realignment of this boundary road. If approved, this road could establish a new and more defined eastern boundary for the Reserve and ensure that future utility access and maintenance activities occur outside of the Reserve. The road would also provide entry into a City substation without passing through the Reserve. The developers are also planning to provide for better recreation management in Moe's Valley. Currently, parking for Moe's Valley occurs within the interior of Zone 6 and results in many habitat impacts. While camping is not allowed, some illegal camping still occurs and is difficult to enforce. The proposed plans include an established parking area to access Moe's Valley within their development and provides for a privately managed campground outside of the Reserve. For the substation, the developer proposed adding Box Canyon (3.11 acres) to offset its 1.73 acres removed and for the 1.17 acres of the new road alignment. The other project proponent proposes to offset 3.5 acres of habitat loss from the boundary road and trailhead, by adding 3.5 acres in the same general area.

On September 6-7, HCP staff conducted 10-meter belt transect surveys on all of the parcels proposed for possible inclusion in the boundary adjustment. No tortoise sign was observed along the utility road or south of the substation. Tortoise sign was observed in 3 of the potential incoming parcels (Attachment 1). In December 2021, USFWS provided specific guidance to evaluate Reserve boundary modifications (Attachment 2). This guidance was previously used to authorize a similar boundary adjustment in the Grapevine area in 2022.

In September of 2023, the TC provided a recommendation to the HCAC regarding the potential boundary adjustment in Zone 6. The committee supported the Box canyon parcel and recommended that approximately 3.5 acres of SITLA land to be added into the Reserve to offset removals from the boundary road and trailhead. This proposal was tabled after further discussion with HCAC members because SITLA expressed unwillingness to include any more of their lands in Zone 6. The local developer would now like the TC members to reconsider his private land offering as a suitable exchange for the boundary adjustment.

Related to the previous boundary proposal, at the January HCAC meeting, the more northerly portion of the boundary adjustment was discussed and a recommendation provided to allow the boundary adjustment for utility access into the substation, contingent on at least equal or more acres being acquired in Box Canyon, as the TC recommended in September of 2023. The latest recommendation essentially splits the past boundary adjustment proposal into two separate projects. However, as per the HCAC recommendation, any surplus land potentially acquired in Box Canyon, could be used to facilitate the boundary adjustment along the new road or Moe's Valley trailhead.

TC Assignment:

1. Please review the proposed boundary change again and update the TC evaluation forms as necessary.
2. Provide a recommendation to the HCAC and County regarding the project impacts and benefits to determine if the proposed project meets the biological conditions for boundary change. If it falls short, provide a recommendation on how it could meet the required conditions for a boundary change.

Washington County HCP Evaluation Form for Covered Activities in the Red Cliffs Desert Reserve

Proposed Project: Zone 6 Boundary Adjustment

Date Assigned by HCAC/County: July 2023

Review Date: February 8, 2024

Requested Deadline: March 2024

Alternatives Considered by Project Proponent & HCAC/County: Past alternatives for the substation access and bypass road were considered in 2022. The bypass road would have removed 20+ acres from the Reserve. Also in 2022, the County met with local rock climbers, St. George City and the developers at Quality Development to consider a Moes Valley trailhead in the Reserve which would have impacted 1-2 acres.

Project Description and Applicant Committed Measures:

When Reserve Zone 6 was initially created, the east boundary followed the alignment of a 2-track utility road under a set of major power lines. Since then, a more current development plan (Figure 1) proposes a straightened realignment of this boundary road. If approved, this road could establish a new and more defined eastern boundary for the Reserve and ensure that future utility access and maintenance activities occur outside of the Reserve. The road would also provide entry into a City substation without passing through the Reserve. The developers are also planning to provide for better recreation management in Moe's Valley. Currently, parking for Moe's Valley occurs within the interior of Zone 6 and results in many habitat impacts. While camping is not allowed, some illegal camping still occurs and is difficult to enforce. The proposed plans include an established parking area to access Moe's Valley within their development and provides for a privately managed campground outside of the Reserve. For the substation, the developer proposed adding Box Canyon (3.11 acres) to offset its 1.73 acres removed and for the 1.17 acres of the new road alignment. The other project proponent proposes to offset 3.5 acres of habitat loss from the boundary road and trailhead, by adding 3.5 acres in the same general area.

On September 6-7, HCP staff conducted 10-meter belt transect surveys on all of the parcels proposed for possible inclusion in the boundary adjustment. No tortoise sign was observed along the utility road or south of the substation. Tortoise sign was observed in 3 of the potential incoming parcels (Attachment 1). In December 2021, USFWS provided specific guidance to evaluate Reserve boundary modifications (Attachment 2). This guidance was previously used to authorize a similar boundary adjustment in the Grapevine area in 2022.

In September of 2023, the TC provided a recommendation to the HCAC regarding the potential boundary adjustment in Zone 6. The committee supported the Box canyon parcel and recommended that approximately 3.5 acres of SITLA land to be added into the Reserve to offset removals from the boundary road and trailhead. This proposal was tabled after further discussion with HCAC members because SITLA expressed unwillingness to include any more of their lands in Zone 6. The local developer would now like the TC members to reconsider his private land offering as a suitable exchange for the boundary adjustment.

Related to the previous boundary proposal, at the January HCAC meeting, the more northerly portion of the boundary adjustment was discussed and a recommendation provided to allow the boundary adjustment for utility access into the substation, contingent on at least equal or more acres being acquired in Box Canyon, as the TC recommended in September of 2023. The latest recommendation essentially splits the past boundary adjustment proposal into two separate projects. However, as per the HCAC recommendation, any surplus land potentially acquired in Box Canyon, could be used to facilitate the boundary adjustment along the new road or Moe's Valley trailhead.

Effects Analysis: TC Committee evaluated the outgoing parcels 1a, 1b, and 2 (6.4 acres) against incoming parcels 1a, 1b, and 2b (7.8 acres). Parcel 2b was rejected due to isolation from the rest of the Reserve.

RESERVE VALUES	CURRENT CONDITION (No Action Alternative)	ANALYSIS OF PROJECT ACTIONS & CONSERVATION MEASURES		Net Outcome
		Impacts	Benefits	
1. ANIMALS				
Direct Effects to Tortoises (use survey, if available)*	Low threat to tortoises due to current utility use and open road access	Minimal impacts due to no tortoise sign found in removal parcels, less occupied	Beneficial since most of the habitat added is occupied by tortoise	Habitat added is more occupied than the habitat removed, but the benefit is diminished by its limited culvert access.
2. RESERVE SIZE / SHAPE				
Permanent Impacts (acres) impacts 5+ years	No change	3.5 acres removed from Reserve	3.5 acres added to the Reserve	Acreeage added is equal in size and better habitat than acreage removed. Current impacts in the Reserve from utility use can be shifted to occur outside of it. Area / permiter ratio will not change significantly.
Temporary Impacts (acres) < 10 years to recover	Utilities are in or adjacent to Reserve and parking for Moes Valley occurs inside the Reserve	None, impacts will occur outside of Reserve	Utility use and maintenance & Moes Valley trailhead parking will shift impacts to outside of Reserve	
Reserve Area: Perimeter Ratio	28606 m / 6812 acres = 4.2	Slight increase to area : p ratio	29019 m / 6813 acres = 4.26	
3. RANGE INTACTNESS (± 0-2)**	0	0	0	No change.
4. CONNECTIVITY (± 0-2)**	0	minus	plus	Habitat added would be fragmented along 60 m by a fenced road. This would be partially mitigated by addition of a culvert at a centrally located area.
Barriers (m)	0	60 m	culvert access	
Crossing structures (# or per m)	0	0	1 / 60 meters	Habitat quality is improved since the
5. CONDITION				

Habitat Quality (1-3)*** and Effects to Habitat Quality	Utility road with development expected in near future.	1: Outgoing habitat is heavily disturbed by roads and parking areas. Mitigation parcel provides habitat but is surrounded by private property and future development.	2 & 3: Most of the incoming habitat is high quality, but there is some that has recreational impacts, and is adjacent to popular recreation area.	habitat coming in is occupied by tortoise and is ranked higher quality than the habitat going out. The future utility/recreation disturbances will occur more largely outside of the Reserve.
OTHER CONSIDERATIONS (if applicable)				
Effects to adjacent habitat or other concerns?	Illegal camping and OHV use still occurs at low levels inside the Reserve in this area. High fire threat.	None, future impacts will mostly occur outside of the Reserve.	Impacts from camping, parking, trailhead use, restrooms and utility access will now occur on private property instead of in the Reserve, potentially reducing wildfire danger within the Reserve.	This project can be beneficial since the impacts from camping, parking, trailhead use, restrooms and utility access will now occur on private property instead of in the Reserve, potentially reducing wildfire danger within the Reserve.

* Results of tortoise survey should be provided to establish number of tortoises under current condition; if absent, use nearest density estimates.

** 2 = significant effects (addition or removal of barriers / mitigation), 1 = minor changes to habitat quality that could effect movement

*** 3 = high quality, unburned or recovered, dense coverage of forage plants, little to no disturbance, invasive plants not dominant;

1 = low quality, multiple burns, considerable disturbance, invasive plants prevalent; 2 = moderate habitat conditions relative to categories 1 and 3.

Summary of Net Outcomes

The habitat coming into the Reserve is of better quality and less impacted than the habitat going out. Tortoises will be better protected when the project is complete and fencing is installed along the new boundary. Although 60 meters of the habitat coming into the Reserve would be fragmented by a future road, this is largely offset by the fact that it is occupied habitat of better quality and access will be provided by construction of a culvert under the road. Future utility access and maintenance can occur more easily outside of the Reserve. Recreational impacts can also be largely shifted to occur outside of the Reserve with the new trailhead, restrooms and camping area on private property. The Reserve size and shape remains relatively the same with a slight increase in area to permit ratio. The TC recognizes that this proposal represents an exceptional circumstance with a fragmented mitigation area that would only be reachable by tortoises via culvert crossing. This type of mitigation area would not generally be considered acceptable to fully offset project impacts due to issues with Reserve design and connectivity. However, in this case the habitat being removed from the Reserve is degraded and unoccupied, and the fragmented mitigation parcel is minimally impacted and occupied habitat. Recent culvert studies in the Reserve show that tortoise will use culverts for passage and sheltering, potentially indicating that access to the mitigation area could be viable. Therefore, this should be considered an unusual instance where a fragmented parcel will fully offset project impacts. The developer's commitment to locate the Moe's Valley trailhead/parking area outside of the Reserve boundaries would mitigate the current heavy parking usage occurring within Reserve boundaries. This action would reduce threats to tortoise including from vehicle related mortalities, increased risk of fire, and motorized vehicle intrusion into the core of Zone 6. Designated step-overs will help to confine non-motorized recreation to authorized trails. Due to these exceptional circumstances, we emphasize that this project should not set a precedent for future mitigation proposals with fragmentation impacts.

Additional Recommended Conservation Measures To Reach No Net Loss Goal (only if summary of net outcomes is negative)

Other Recommended Conservation Measures (UDPs, biological monitor, tortoise awareness training, etc.)

UDPs should be followed during construction of the new road, trailhead and fence. Developers should coordinate with HCP regarding signage and educational information at trailhead. Fencing along the new roadway, trailhead and substation should be coordinated with the HCP office to ensure that is completed prior to any ground disturbing activities. Culvert dimensions/design should also be coordinated with the HCP. The project proponent is expected to conduct ongoing maintenance/repairs on the fencing (both the mitigation parcel and area adjacent to new roadway), in addition to the culvert which should be kept clear of debris to ensure tortoise passage. The County HCP will commit to install a game camera at the culvert to monitor this site for at least 2 seasons. This will help inform mitigation effectiveness for future projects that might have fragmentation impacts.

TC Member Evaluations: (independent evaluations or considerations from TC members not already captured above)

Additional USFWS Guidance on Implementing Incidental Take Authorization in the Reserve:

The County should utilize its advisory bodies of the HCAC and TC to evaluate projects resulting in incidental take in the Reserve and Covered Activities should only be authorized on 200 acres within the Reserve for the duration of the Amended ITP term (5.3 & 7.3 Amended HCP). As per 5.3 of the Amended HCP, *Conservation measures that address HCAC or TC recommendations for offsetting impacts to MDT taken by Covered Activities Inside the Reserve may include the following: the acquisition and permanent protection of MDT habitat outside of the Reserve at impact-to protection ratios consistent with guidance in the DTMOG (1991); case-by-case consideration for conservation credit generated by actions that enhance connectivity of MDT habitat across the Plan Area, restore degraded MDT habitat, or prevent wildfire within the Reserve, or contribute to MDT head-starting or population augmentation efforts within the Plan Area; or conservation credit acquired from in-lieu fee programs or third party conservation banks if such program becomes available in the future*. USFWS further recommends that acre for acre mitigation be the highest priority for addressing permanent impacts and should be considered prior to alternative conservation measures listed above. USFWS also recommends that the fee-in lieu of mitigation option only be utilized for projects less than 1 acre of permanent impacts and with the condition that the Reserve remain of equal or larger size. The following are additional recommendations for the permanent impacts analysis:

Remuneration rates (i.e., ratio) are determined using a five factor rubric:

- o Habitat Category ranking I, II, or III are given scores of 3, 2, or 1, respectively.
- o If the affected habitat is categorized as I or II the following scores are added to the ratio:
 - o the impact will be less than 10 years (score = 0) or longer than 10 years (1);
 - o Site disturbance prior to the action is “moderate” or worse (0) or little (1);
- o The proposed action will likely support human population growth, community expansion, development, or other related activities in the vicinity (0.5) or it is not anticipated to do so (0); and
- o The proposed action is not anticipated to have direct or indirect effects on adjacent tortoise habitat or populations (0), or it is anticipated to have either direct or indirect effects to habitat or populations (0.5).
- o If the affected habitat is categorized as III, the maximum compensation ratio is 1 regardless the other factors (DTCT 1991, page 7).

The criteria used to categorize tortoise habitat include (1) importance of the habitat in maintaining viable tortoise populations, (2) the resolvability of conflicts associated with the habitat, (3) tortoise density, and (4) tortoise population trends (Spang et al. 1988, page 12). Scores from the rubric are summed to produce the rate for compensation, except for Category III habitats.

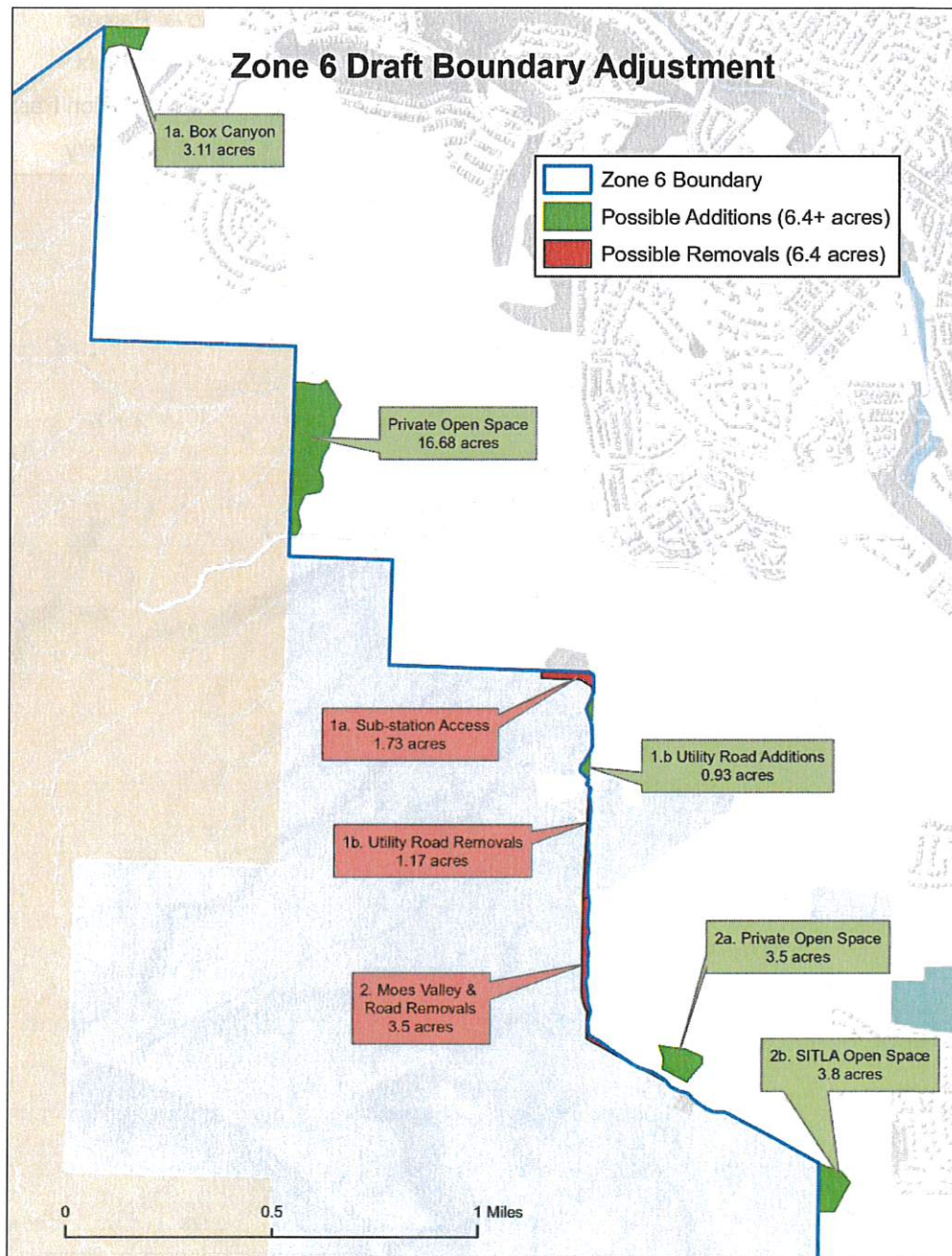
Remuneration fees for habitat disturbance in Utah must be provided to the National Fish and Wildlife Foundation prior to surface disturbing activities associated with the proposed project (FWS Region 6 Omnibus Escrow Account, Utah Desert Tortoise sub-account). The fees are adjusted for inflation annually (October) relative to a rate of \$754 per acre in 2010 using the Composite Consumer Price Index (CPI) calculator (https://www.bls.gov/data/inflation_calculator.htm). As of September 2022, the rate is \$1,033 / acre.

Tortoise Survey Report for Zone 6 Boundary Adjustment

9/8/2023

Background

During the July 2023 HCAC meeting, Rick Rosenberg presented an updated plan for a utility easement to access the St. George City substation (near Green Valley Gap) located just outside Zone 6 of the Red Cliffs Desert Reserve. A total of 6.4 acres are proposed for removal from the Reserve along the eastern boundary of Zone 6 between the substation and Moe's Valley. In exchange, project proponents are proposing between 6.4-7.8 acres for addition to the Reserve, mostly in contiguous areas. All areas proposed to be added or removed from the Reserve are on private, SITLA, or St. George City lands (Figure 1 - below).



Methods

Four Washington County HCP employees surveyed the 6.4-acre proposed removal areas and 28.02 acres of potential Reserve addition areas on September 6 and 7, 2023. U.S. Fish & Wildlife (USFWS) protocols were followed by walking 10-meter belt transects throughout each survey area. Surveys were completed between the hours of 8:30 AM and 12:30 PM.

Figure 2. Completed belt transects within proposed removal and southern addition parcels

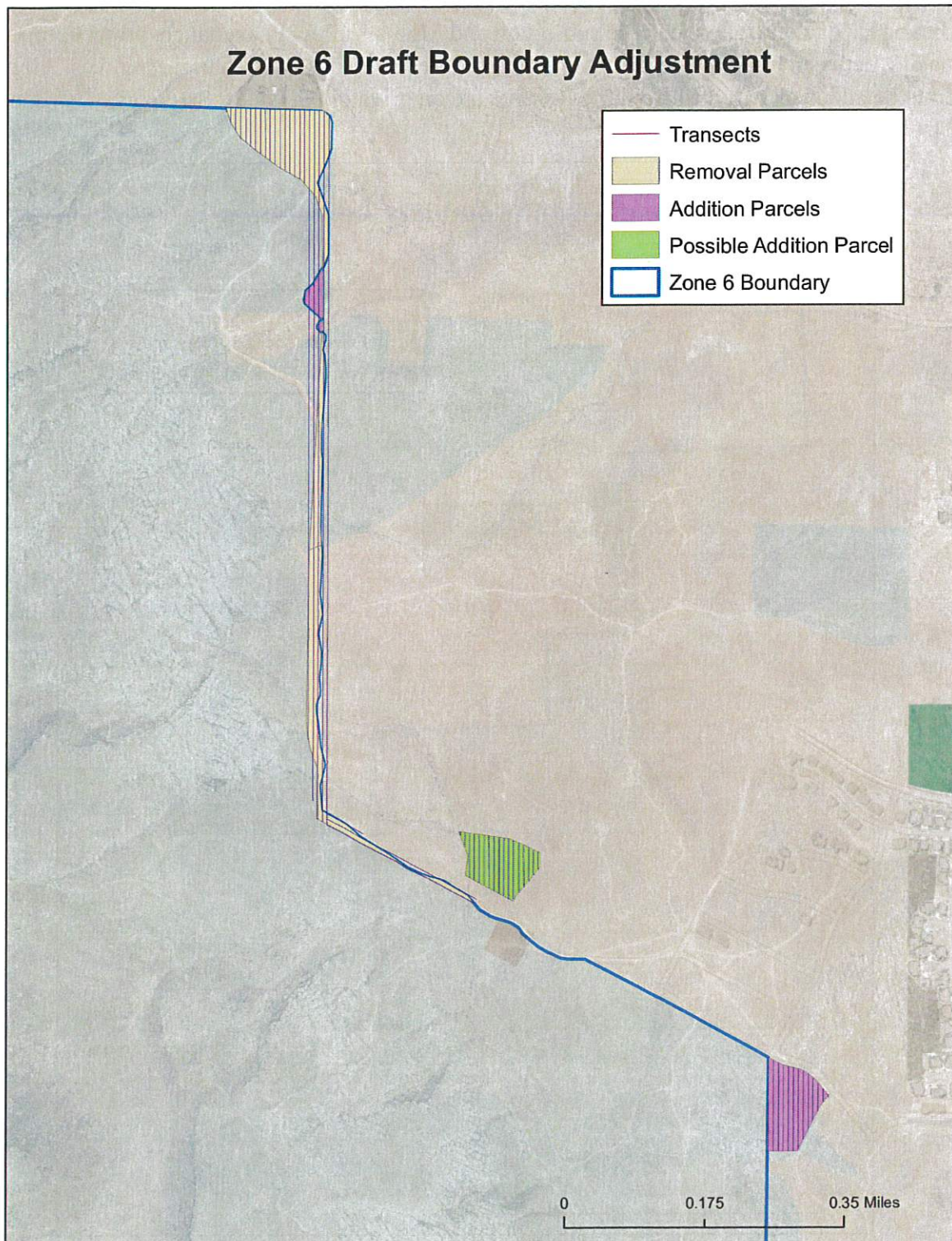
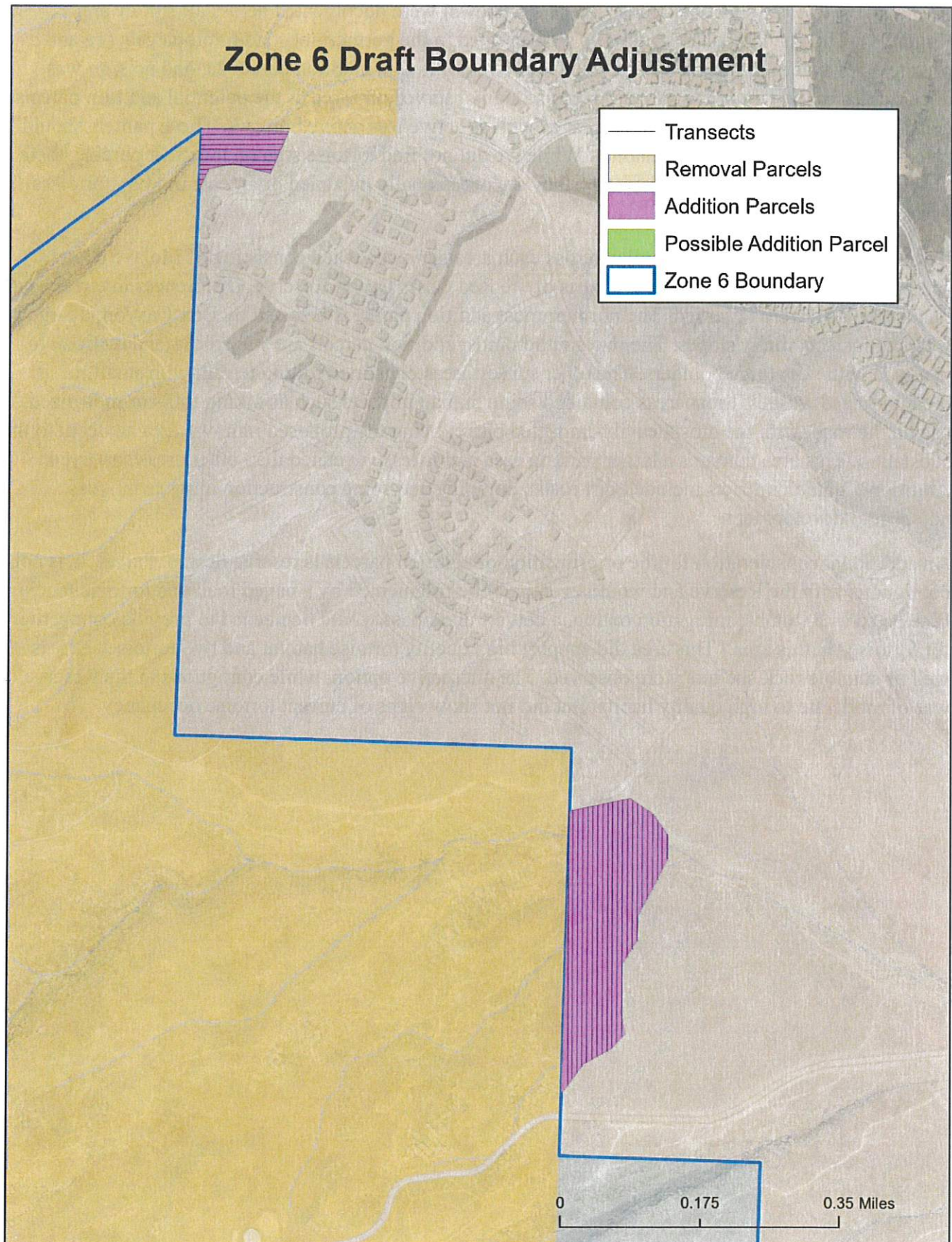


Figure 3. Completed belt transects within northern addition parcels



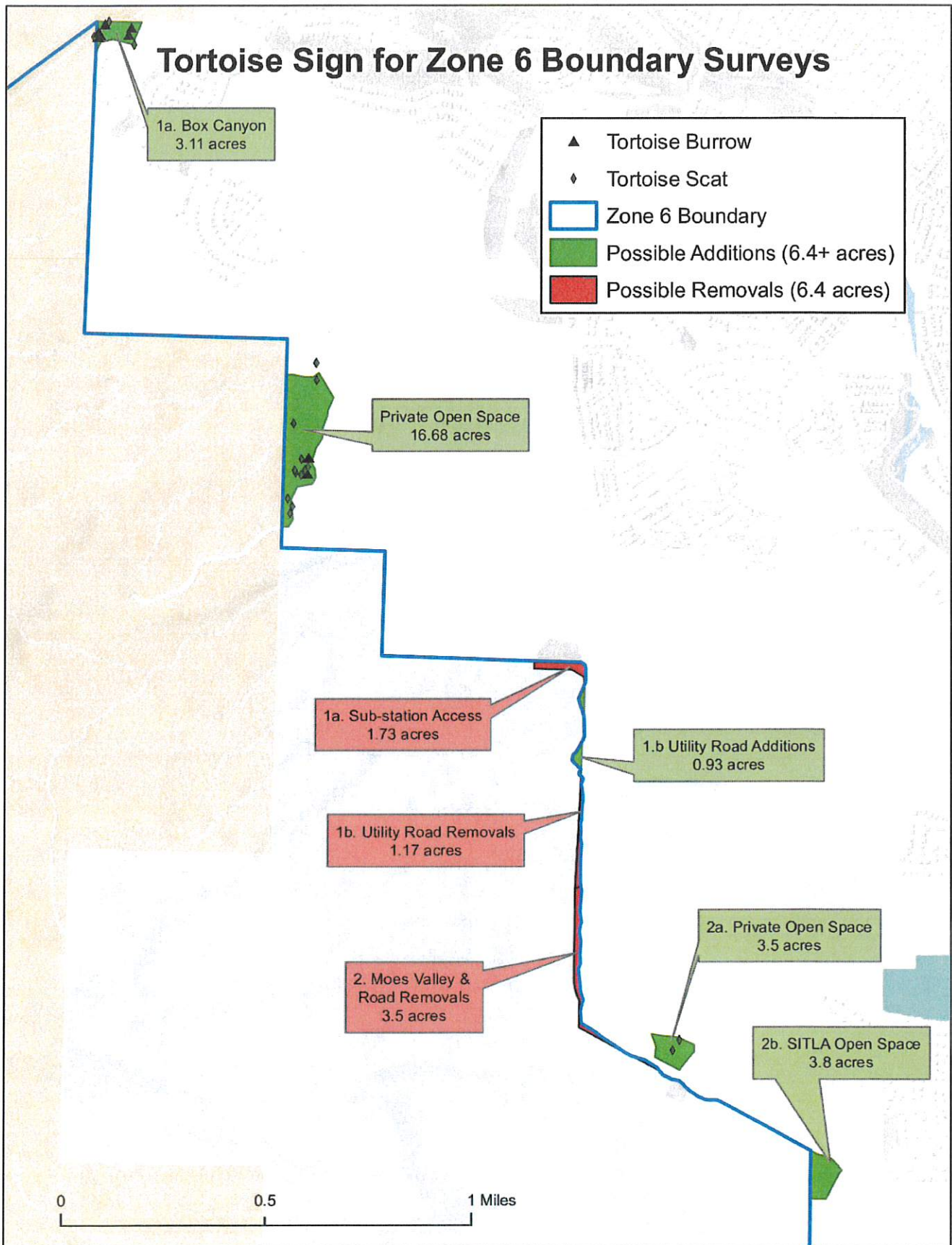
Results, Habitat, & Discussion

A total of 30 tortoise sign detections (scat and burrows) were documented across all survey areas (Figure 4). The majority of this sign was concentrated in the northernmost addition parcels (1a and private open space parcels). Two scat detections were found in addition parcel 2a, and no sign was documented in the remaining parcels. Tortoise sign observed on three of the potential addition parcels consisted of a mix of recent and older scat as well as active/less active burrows. These parcels should be considered occupied tortoise habitat. While we did not find tortoise sign on the other parcels, their proximity to quality habitat suggests that they are occasionally occupied or at least used by tortoises occasionally passing through.

Vegetation types were mostly similar across each area surveyed, each consisting of Mojave desert scrubland habitats similar to adjacent parts of the Red Cliffs Desert Reserve. Differences in terrain and human impacts were observed. The northernmost addition parcel is bisected by Box Canyon, a large wash with steep, rocky slopes. The two southernmost addition parcels are very rocky and difficult to navigate with very large boulders. The other survey areas contained rolling terrain with small to medium-sized washes. Most areas contained some human impacts such as biking trails or motorized use on the road, with the most heavily-impacted parcel being the proposed removal area adjacent to the substation. This area contains a larger parking area and is less vegetated than other areas surveyed. Additional human impacts included dirt roads, dumping and some construction impacts in areas adjacent to development.

An additional consideration for the prioritization of addition parcels is reserve design. Parcel 2a is not contiguous with the Reserve and would eventually be fragmented by a paved road and tortoise fencing. If selected as a suitable mitigation option, a culvert/underpass would be needed to provide connectivity for tortoises in this area. This area did support high quality tortoise habitat and two tortoise scats as well as suitable rock shelters were observed. The alternative option, while contiguous to the Reserve, was of moderate to high quality habitat but did not show signs of current tortoise occupancy.

Figure 4. Map of documented tortoise sign





United States Department of the Interior



FISH AND WILDLIFE SERVICE
2369 West Orton Circle Suite 50
West Valley City, Utah 84119

In Reply Refer to:
FWS/R6

December 3, 2021

Washington County Habitat Conservation Plan Administrator
Washington County Attorney and Commissioners
10 North 100 East
St. George, UT 84770

Subject: Recommended process and guidance for Red Cliffs Desert Reserve boundary adjustments under the Washington County HCP

Dear Cameron, Eric, and County Commissioners,

This letter is to outline US Fish and Wildlife Service (Service) guidance and recommendations to Washington County in support of their role in establishing and administering the 2020 Washington County Habitat Conservation Plan (HCP) and in managing the Red Cliff Desert Reserve (Reserve) as the primary component of the HCP Conservation Program.

Specifically, this letter includes: (1) background on the analysis for issuance of the Incidental Take Permit (ITP) as it relates to the Reserve; (2) a recommended process for making boundary adjustments to the Reserve; and (3) clarification of incidental take within the Reserve boundaries.

As described in the 2020 HCP, the Reserve was established for the protection of Mojave desert tortoise (tortoise) and its habitat in perpetuity in order to offset impacts from the taking associated with development in Washington County. In the Findings and Recommendations for the Issuance of the Endangered Species Act 10(A)(1)(b) Incidental Take Statement for the Washington County Habitat Conservation Plan (Findings), we analyzed the Reserve as described in the 2020 HCP as the primary component of the HCP Conservation Program. We analyzed Reserve ecological function based on the Reserve having and retaining specific biological values necessary to conserve the tortoise. We asserted that these biological values are fundamental components of a functional ecological reserve for the tortoise and would be maintained to ensure the success of the HCP Conservation Program.

INTERIOR REGION 5
MISSOURI BASIN

KANSAS, MONTANA*, NEBRASKA, NORTH DAKOTA,
SOUTH DAKOTA

*PARTIAL

INTERIOR REGION 7
UPPER COLORADO RIVER BASIN

COLORADO, NEW MEXICO, UTAH, WYOMING

The biological reserve values are defined in the Findings as Animals, Size and Area, Intactness, Connectivity, and Habitat Condition.* These biological reserve values are founded in principles of conservation biology and based on best available science and the tortoise recovery plans. As such, the biological reserve values can be used to monitor and track actions undertaken through management of the Reserve to ensure it continues to support the tortoise and effects do not compromise the function of the Reserve.

In the summer of 2021, the HCP Technical Committee under the leadership of the HCP Administrator and with our guidance, began an effort to develop metrics for the biological reserve values that could be used to track tortoise response to management and to ensure the goals of the Reserve are achieved and supported. We recommend incorporating aspects of those metrics into the process for evaluation of projects that may affect the Reserve (as per Utility Development Protocols) on non-Federal land. We also recommend use of these metrics to evaluate minor boundary adjustments.

At this juncture, we want to emphasize that first and foremost, the Reserve should be maintained as intact and protected as it was described in the 2020 HCP. The Reserve was analyzed in our issuance of the ITP and is integral to the long-term protection of the tortoise in Washington County. However, we recognize that the boundary may be affected by community activities, and where it is beneficial or neutral to the tortoise, the boundary can be adjusted if the integrity of the Reserve biological values is maintained or improved. That integrity must be tracked and assessed through metrics for biological values as identified by the Technical Committee for the Advisory Committee's consideration.

Guidance under Section 10 of the Endangered Species Act (ESA) for Habitat Conservation Planning no longer discerns major and minor amendments. All changes to the HCP, ITP, or associated documents will need to be evaluated to ensure a proposed amendment continues to satisfy ESA statutory and regulatory requirements. Where clarification to the HCP will affect future implementation, the interpretation should be memorialized, retained, and distributed to affected partners. We recommend continued use of the existing team structure of HCP Advisory and Technical Committees to ensure input is broadly considered, complies with the ITP, and continues to fully offset the impacts of the taking of the desert tortoise. If the scale or scope of the change is significant, the Service may need to amend the ITP, National Environmental Policy Act compliance documents, and/or our intra-Service Section 7 analysis.

The below outline provides our recommended process to consider minor adjustments to the Red Cliffs Desert Reserve (Reserve) boundary when they are deemed necessary by the County and us. Boundary adjustments can occur meeting the following conditions:

- 1) *Beneficial or Neutral Effect to the Biological Values of the Reserve:* The proposed boundary adjustment should result in no net reduction to the size or habitat quantity or quality in the Red Cliffs Desert Reserve, such that the Reserve size will remain the same or increase in area, and habitats added to the Reserve will be of similar or better habitat quality (using the proposed reporting process of evaluating metrics associated with biological values) than those removed in the boundary adjustment. Similarly, the geographic configuration of exchanged lands should not negatively affect reserve

connectivity (e.g., increase habitat fragmentation within the reserve) or intactness with the rest of the species range.

- 2) *Habitat Conservation Advisory Committee Review*: Proposed boundary adjustments should be presented to the Habitat Conservation Advisory Committee (HCAC) for evaluation and consideration. Prior to making a recommendation to the County, we recommend that the HCAC seek feedback from the Technical Committee on how the proposed boundary adjustment would affect reserve values (e.g., size, condition, animals, connectivity, and intactness).
- 3) *Washington County and U.S. Fish and Wildlife Service Approval*: Both the Washington County HCP Administrator and the Service Utah Ecological Field Office Supervisor have reviewed the boundary adjustment and have provided their written approval of the adjustment.

We would also like to clarify questions related to the 200 acres of incidental take authorized by the ITP associated with impacts within the 2020 HCP Reserve. Incidental take authorized under the 2021 ITP is to Washington County as the permittee. The 200 acres was described in the 2020 HCP to estimate likely loss due to expected activities consistent with the Reserve management since 1996. This incidental take can only be used for this purpose and in that location. Any changes to the type or location of this take would require an amendment to the ITP.

For purposes of boundary adjustments or any impacts within the boundaries of the Reserve as it was defined in the 2020 HCP, incidental take (measured by acres) must be available under the County's Incidental Take Permit to support the boundary change. The acreage being removed from the Reserve must be subtracted from the 200 acres of Incidental Take authorized for projects in the Reserve even if other lands are added to the Reserve. Lands that are added to the Reserve will be tracked in annual reporting and any benefits achieved from an exchange will be considered if an amendment to the total authorized take is needed.

If the County approaches the 200-acre limit of incidental take authorized within the Reserve prior to the expiration of the ITP, the County may request an amendment to the HCP and ITP (2020 Washington County HCP Section 7.7 and Service HCP Handbook Section 17.4). An amendment would be subject to Service review under the same standards and process as a new ITP application, with public notice and comment, NEPA analysis, and ESA Section 7 analysis and would include consideration of any additional acreage and its biological value at that time. In the event the incidental take is used or exceeded, in or out of the Reserve, incidental take associated with covered activities would not be authorized and must immediately cease.

Because we work closely with Washington County and the Advisory Committee to review any boundary changes and activities that would result in incidental take in the Reserve, we do not expect the need for an amendment to occur without notice well in advance. In addition to acting conservatively with respect to changes and effects to the Reserve, we expect to

continue working with you to consider the situation and plan a path forward with you. We also encourage continued employment of adaptive management as outlined in the 2020 HCP, to respond to any issues that might arise and to promote the appropriate uses and values of the Reserve within the various jurisdictions where it exists. We are committed to working with Washington County to track Reserve management, incidental take, and the HCP Conservation Program to ensure the desert tortoise is protected and the Reserve is maintained in condition that supports the tortoise in perpetuity.

Thank you for your significant commitment to conserving the tortoise and maintaining the Reserve for the tortoise's long-term persistence. Please feel free to contact me or Garrett Sisson at 801-975-3330 with any questions or concerns.

Sincerely,

**YVETTE
CONVERSE**

Digitally signed by YVETTE
CONVERSE
Date: 2021.12.03 12:19:04
-07'00'

Yvette Converse
Field Supervisor