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"Biological integrity, fiscal accountability, and community transparency"

December 10, 2023

Bureau of Land Management
Attn: Dawna Ferris-Rowley
Via BLM_UT_NorthernCorridor@blm.gov

Re: DOI-BLM-UT-C030-2023-0038-EIS, Northern Corridor Highway, Opposition

We thank the Bureau of Land Management and the US Fish & Wildlife Service for providing further opportunity for public comment and reopening consideration of a four-lane highway through the Red Cliffs Desert Reserve and National Conservation Area. **We oppose this right-of-way for a highway.**

Antelope Valley Conservancy has preserved habitat for threatened and endangered species since 2005 by implementing mitigation for government project permits and by obtaining federal and local grants and contributions to purchase land. AVC has earned Authorization to Hold Mitigation Lands by the State of California Department of Fish & Wildlife since 2008. As we understand, federal Land and Water Conservation Fund moneys were used for land purchase in the Red Cliffs Desert Reserve and National Conservation Area, specifically for the conservation and management of desert tortoise and other endangered species, and some of those parcels would be irrevocably damaged by the highway. **It is unthinkable that lands funded for conservation by any of these fund sources would be allowed to be impacted in any way, least of all by a highway.**

Also, local residents have opposed this highway route for almost 20 years and there are other routes that the local citizens prefer. Notably, the Final Environmental Impact Statement (FEIS) determined that both the Red Hills Expressway and Couplet alternatives not only align with but surpass the transportation objectives of the Northern Corridor Highway – and were shown to be more cost-effective because they modified existing roadways. **We urge the Bureau to conduct additional analysis of the FEIS alternatives that do not involve bulldozing habitats within Red Cliffs NCA.**

We ask the Bureau and the Service to draw a line in the sand for desert tortoises, and deny this project. With the incredible habitat loss and species extinctions of the past 100 years, every acre of protected land is critical, especially for desert tortoise. Please protect the Red Cliffs NCA from this project.

By Resolution of
ANTELOPE VALLEY CONSERVANCY

Attested By Wendy Schiff, Director/Secretary