



## DESERT TORTOISE COUNCIL

P.O. Box 1568  
Ridgecrest, California 93556  
[www.deserttortoise.org](http://www.deserttortoise.org)

**Via email only**

16 October 2013

Lane Cowger  
Bureau of Land Management Arizona State Office  
1 North Central Avenue, Suite 800  
Phoenix, Arizona 85004  
[BLM\\_AZ\\_Maricopasolar@blm.gov](mailto:BLM_AZ_Maricopasolar@blm.gov)

RE: Maricopa Solar Park Scoping

Dear Mr. Cowger,

The Desert Tortoise Council (Council) is a private, non-profit organization comprised of hundreds of professionals and laypersons who share a common concern for wild desert tortoises and a commitment to advancing the public's understanding of this species. Established in 1976 to promote conservation of tortoises in the deserts of the southwestern United States and Mexico, the Council regularly provides information to individuals, organizations and regulatory agencies on matters potentially affecting the desert tortoise within its historical range.

We appreciate your responsiveness to our attached letter of 3 February 2013 to Ms. Clara Stabiumi, Marisol Energy 2 LLC in which we asked that the Council be considered an "Interested Party" for the proposed Maricopa Solar Park project.

After receiving feedback from two of our board members who reside in Arizona, we anticipate that the proposed project will not likely have an effect on the Morafka desert tortoise (*Gopherus morafkai*), which occurs in mountainous areas of the region. We base this assumption on our understanding that the solar fields, transmission lines, and associated facilities will *not* be situated in mountainous desert habitats where Morafka desert tortoises reside.

If these assumptions are correct and it is also your understanding that neither the Morafka desert tortoise nor its occupied habitats will be affected, you may remove us from your list of Interested Parties for this project. If it is your understanding, either through previous surveys or new field studies conducted for this project, that desert tortoises may be affected, we would then like to receive future environmental documents that will enable us to comment.

Thank you for your time,

Edward L., LaRue, Jr., M.S.  
Desert Tortoise Council, Ecosystems Advisory Council, Chairperson