



## DESERT TORTOISE COUNCIL

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

**Via email only**

11 September 2013

Lorraine Christian, Diana Hawks  
Bureau of Land Management, Arizona Strip Field Office  
345 East Riverside Drive  
St. George, Utah 84790  
[Arizona.Strip@blm.gov](mailto:Arizona.Strip@blm.gov)

RE: Vehicle route designation on the Arizona Strip

Dear Ms. Christian, Ms. Hawk:

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.

In early August 2013, we received a news release that the Bureau of Land Management (BLM), Arizona Strip Field Office (Field Office) is pursuing establishment of authorized vehicle routes of travel in the Arizona Strip planning area (Arizona Strip). The following description is taken from the news release:

*"The Bureau of Land Management (BLM) is working to define where motorized vehicle use should be allowed in the Arizona Strip area and residents are invited to have input during a series of public meetings to review the alternatives and environmental assessment. The travel management area to be discussed already has a Resource Management Plan, which was completed in 2008. However, specific route designations were postponed while the BLM inventoried and evaluated the existing routes in the Colorado City, Littlefield and St. George Basin areas.*

*"The BLM is tasked with developing a specific travel management plan for the area, using both public input and analysis of natural and cultural resources, safety issues, needed access and possible user conflicts in the area."*

Although our board members (including two Arizona residents) were unable to attend any of the public meetings scheduled on 13, 14, 15 August 2013 in Arizona and Utah, herein we want to commend the Field Office for pursuing route designation and express our concern for how important route designation and enforcement is to the recovery of the desert tortoise and the conservation of its habitat.

To allow the public to fully understand the impacts that would result from the proposed project, and therefore to fully comply with the National Environmental Policy Act (NEPA), we provide the following recommendations to the Field Office staff:

- We understand that portions of the Littlefield and St. George Basin subregions support populations of desert tortoises. We strongly recommend that future maps released to the public showing intended route designations also display those areas that comprise occupied, suitable, and critical desert tortoise habitats.
- The best way we can assess the quality and effectiveness of route designation on the Arizona Strip is to have maps that show (a) the existing routes within the planning area; (b) those routes that are to be designated as closed, opened, and limited use; and (c) the locations of closed, opened, and limited use routes relative to occupied, suitable, and critical desert tortoise habitats.
- We do not know how old the data may be for displaying existing routes of travel. Whereas existing potential routes of travel may be discerned on aerial photographs, it is important that ground-truthing occur and that new data are used to be sure that all such potential routes are actually being used for travel. During route designation in the Ord-Rodman Desert Wildlife Management Area located in the West Mojave Desert in the mid-1990's, it was apparent that BLM displayed some washes as routes although no evidence of vehicle use was found in them when those potential routes were field surveyed.
- We strongly recommend that no more than a minimal number of routes be designated as "open" in desert tortoise habitat and no routes be authorized in washes; outside tortoise habitat, routes in washes should be minimized. Given the importance of washes as both travel corridors and food resources to desert tortoises, it will predictably benefit tortoise conservation if all washes in tortoise habitat are designated and enforced as closed to vehicular travel; some should be signed as closed.
- The Council strongly recommends that the guidelines and methodology used to first designate and later implement route designation include the following (or similar) statements: "Unless signed as Open or Limited Use, all routes within the Arizona Strip will be considered closed and unavailable for vehicular travel." Alternatively, "Only routes signed as Open or Limited Use may be used for vehicular travel; all other routes, signed or not, will be considered and enforced as Closed."
- To help the reader better understand what is proposed, we also recommend: (1) describing how the new route closures will be enforced; (2) providing an assessment of how likely the public is to obey the new Travel Plan based on previous route closures in other areas; (3) expanding Tables 2.2, 2.3, and 2.4 to include the proposed change from baseline; (4) revising the maps provided in Chapter 2 to make them more reader-friendly; (5) providing the GIS data used to make the maps in Chapter 2, as well as other relevant data such as Critical Habitat, for download in a format easily opened in Google Earth and including a direct link to this data in the EA; (6) providing tables for Alternative A similar to those provided for Alternatives B, C, and D (e.g., Table 4.21); (7) expanding the Tables under Alternatives B, C, and D (e.g., Table 4.21) to clearly indicate what would change if the corresponding Alternative were implemented; and (8) analyzing how public use of the roads remaining open might intensify due to the road closures proposed under each Action Alternative, particularly in relation to existing road use and population centers, and how this change might affect each listed or special status species.
- Finally, we expect that the designation process will acknowledge and provide for long-term monitoring of the efficacy of implementing the final designated route network.

Please consider the Desert Tortoise Council an affected interest in the route designation process, and inform us of all opportunities to review new environmental materials and provide additional comments.

There have been many conscientious biologists and field managers in the Arizona Strip Field Office that have contributed to the conservation and efficacious land management of tortoise habitats, and we sincerely hope and trust that the current staff carries on their legacy.

Regards,

A handwritten signature in blue ink, appearing to read "Ed L. LaRue, Jr.", is centered within a light blue rectangular box.

Edward L., LaRue, Jr., M.S.

Desert Tortoise Council, Ecosystems Advisory Council, Chairperson