



DESERT TORTOISE COUNCIL

4654 East Avenue S #257B
Palmdale, California 93552

www.deserttortoise.org
eac@deserttortoise.org

Via email only

8 May 2018

Mariela Castaneda
Bureau of Land Management
Lower Sonoran Field Office
21605 North 7th Ave
Phoenix, Arizona 85027
Email: buckeyehills@blm.gov

RE: Draft Buckeye Hills Travel Management Plan, Pinal and Maricopa Counties, Arizona

Dear Mariela Castaneda,

The Desert Tortoise Council (Council) is a 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 desert tortoises and their habitats. Established in 1975 to promote conservation of tortoises and their habitats in the deserts of the southwestern United States and Mexico, the Council routinely provides information to individuals, organizations, and regulatory agencies on matters potentially affecting desert tortoises.

We appreciate this opportunity to provide comments on the Implementation Plan (IP) and Environmental Assessment (EA) for Buckeye Hills Travel Management Plan (TMP; dated April 5th, 2018). We firmly support Bureau of Land Management's (BLM) effort to manage the number and use of roads in the proposed Project Area, and we applaud BLM's emphasis on preserving the natural biological and environmental resources as outlined in the TMP. The EA states that the 679.5 miles of roads currently "open to all use" will decrease significantly under the Proposed Action and Alternatives B, C, and D; this decrease in road-related threats to tortoises and other wildlife comes at a critical time given new threats to wildlife associated with the aridification and precipitation irregularity that has become particularly acute in western Arizona (McGowan et al., 2017; USFWS 2015). Our comments on the TMP are outlined below in two categories: The Council's evaluation of the Proposed Action and Alternatives, and our recommendations regarding its implementation.

Proposed Action & Alternatives

The Council strongly supports management that would limit the use and number of roads in Sonoran desert tortoise (*Gopherus morafkai*) habitat (Categories I, II, and III; EA Map 10); we therefore support the Proposed Action (Alternative C, Blended Proposal), Alternative B (Resource Protection), with less support for Alternative D (Enhanced Recreation Access). We support alternatives B–D over the present status quo (Alternative A) in which all road miles are considered “open to all use.”

The Council recommends minor modifications to the road use designations outlined in the Proposed Action (Alternative C) and have outlined these modifications in Figure 1 (attached). The Council is motivated by concerns that:

- 1) Some roads designated to be “open to all use” are located too close to Category I Sonoran Desert tortoise habitat.
- 2) Some roads designated to be “closed to all use” will prevent the necessary monitoring and assessment of wildlife species, including Sonoran desert tortoises.
- 3) Some roads designated to be “open to all use” are located too close to mountain foothills that may interfere with tortoises feeding in lowlands or migrating through lowland passes.

Modification type 1

There are two sections of road under the Proposed Action plan (Alternative C) designated as “open to all use” that appear to be within one kilometer of Category I Sonoran desert tortoise habitat (EA, Maps 5 and 10). Existing genetic data show relatively little differentiation between populations of Sonoran desert tortoises, suggesting connectivity between populations of high density (i.e. Category I habitat) is important to the integrity of the species (AIDTT 2000; Edwards et al., 2004). As the EA states (pages 44–45), due to vehicle strikes and habitat degradation associated with vehicles, vehicle use should be limited near Category I habitat as much as possible. *The Council strongly recommends changing the road use designation of these two road sections (labeled “1” in Figure 1) from “open to all use” to “Limited to non-motorized use.”*

Modification type 2

The Sonoran desert tortoise underwent candidacy for listing under the Federal Endangered Species Act in 2010, which was subsequently found to be not warranted in 2015. Sonoran desert tortoises remain, however, a “Species of Greatest Conservation Need” in Arizona, and a BLM Sensitive Species. Therefore, continued monitoring to assess the health and welfare of tortoise populations is necessary, particularly given the potential threat of disease from captive or Mojave desert tortoises (*Gopherus agassizii*), which can rapidly destabilize populations (Dickinson et al., 2005; Jones 2008). There are two sections of road designated as “closed to all use” under the Proposed Action (Alternative C) that may negatively affect the access of agency (e.g., Arizona Game and Fish Department) officials and research specialists from accessing and monitoring populations in Category II habitat. *The Council recommends changing the road use designation in these regions (labeled “2” in Figure 1) from “closed to all use” to “Limited to authorized and administrative use” to permit access by these individuals.*

Modification type 3

The EA is correct that Sonoran desert tortoises live predominantly in rocky or boulder-laden slopes that are often less-trafficked than lowlands or bajadas (EA, page 53). However, vegetation can be more plentiful in lowlands, creosote flats, and bajadas, and tortoises may use lowland vegetation, particularly during drought conditions when food is scarce. In addition, these lowlands may facilitate dispersal between more populated buttes or rocky slopes. Allowing unlimited access to off-highway vehicles (OHVs) in the foothills of these regions can lead to vehicle strikes and habitat degradation associated with vehicles, and soil compaction that can prevent growth of annual vegetation. There are three sections of the route network that appear close to foothills, within foothills, or within valley passes between buttes that may affect tortoise mortality, habitat use, and dispersal. *The Council strongly recommends changing the road use designation in these regions (labeled “3” in Figure 1) from “open to all use” to “Limited to non-motorized use” or “Limited to authorized and administrative use.”*

Implementation Plan

The Council supports BLM’s plan of increasing signage to communicate allowable activities for each road use designation. There are three measures the Council believes will be key to achieving the purposes outlined in the TMP for these new road use designations.

1. Monitoring proper use

The Council supports formalizing road use designations as outlined in the TMP’s EA and IP, particularly those designations that limit or prohibit some or all use of motorized vehicles in Sonoran desert tortoise habitat. However, the Council is concerned about efficacy of monitoring and signage in areas where OHVs are not permitted. As an example, the Gibraltar Wilderness Area (east of Parker, AZ) is closed to OHVs and has appropriate signage and vehicle parking locations at its entrance, yet vehicle tracks remain evident across much of the vehicle-restricted area. Establishing deterrents for road misuse and increased monitoring, education, and enforcement are vital to achieving the objectives outlined in BLM’s TMP.

BLM should develop and implement a monitoring plan with an adaptive management component that, using existing baseline information, determines the efficacy of the public adhering to the new road designations, and measures changes to the planning area based on this efficacy (e.g., number of new roads created, adherence to closed road designations, widening of existing roads, changes in native and nonnative plant cover and density, changes in soil compaction, changes in number of individuals of wildlife species killed or injured, etc.). The monitoring plan should have stated objectives and timelines to achieve these objectives.

2. Deterring access to areas closed to OHVs

For areas where OHVs are prohibited, the Council suggests the use of gates or barricades at entrances to roads where use is disallowed under the Proposed Action (Alternative C). We support reclamation of the lands designated as “closed to all use,” but the footprint of the previously used roads remains visible long after use is disallowed. Many recreationists in OHVs may fail to notice (or obey) signage or they simply follow what appear to be primitive or poorly maintained roads. Therefore, we suggest that entrances to these newly closed roads be gated or barricaded to limit misuse and that vertical and/or horizontal mulching or other trail camouflaging technique be implemented.

3. *Wildlife awareness signage*

While Sonoran desert tortoises primarily inhabit slopes, they also prefer moving via primitive or unpaved roads when available. This behavior puts them at risk to motorized vehicles and bicycles in recreation areas, even when their population densities are low. The Council recommends including signage and other forms of education in regions within or near Sonoran desert tortoise habitat that allow OHV users to increase awareness of tortoises that may be using OHV paths or roads.

We appreciate this opportunity to provide input on this proposed TMP and trust that our comments will assist BLM in conserving the Sonoran desert tortoise and its habitat. We ask that the Desert Tortoise Council be identified as an Affected Interest for this and all other BLM projects that may affect Agassiz's desert tortoise and Sonoran desert tortoise, and that any subsequent environmental documentation for this TMP is provided to us at the contact information listed above.

Regards,



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

Literature Cited

- Arizona Interagency Desert Tortoise Team (2000) *Status of the Sonoran Population of the Desert Tortoise in Arizona: an Update*. Arizona Game and Fish Department.
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- Edwards T., Schwalbe C.R., Swann D.E., & Goldberg C.S. (2004) Implications of Anthropogenic Landscape Change on Inter-Population Movements of the Desert Tortoise (*Gopherus agassizii*). *Conservation Genetics*, **5**, 485–499.
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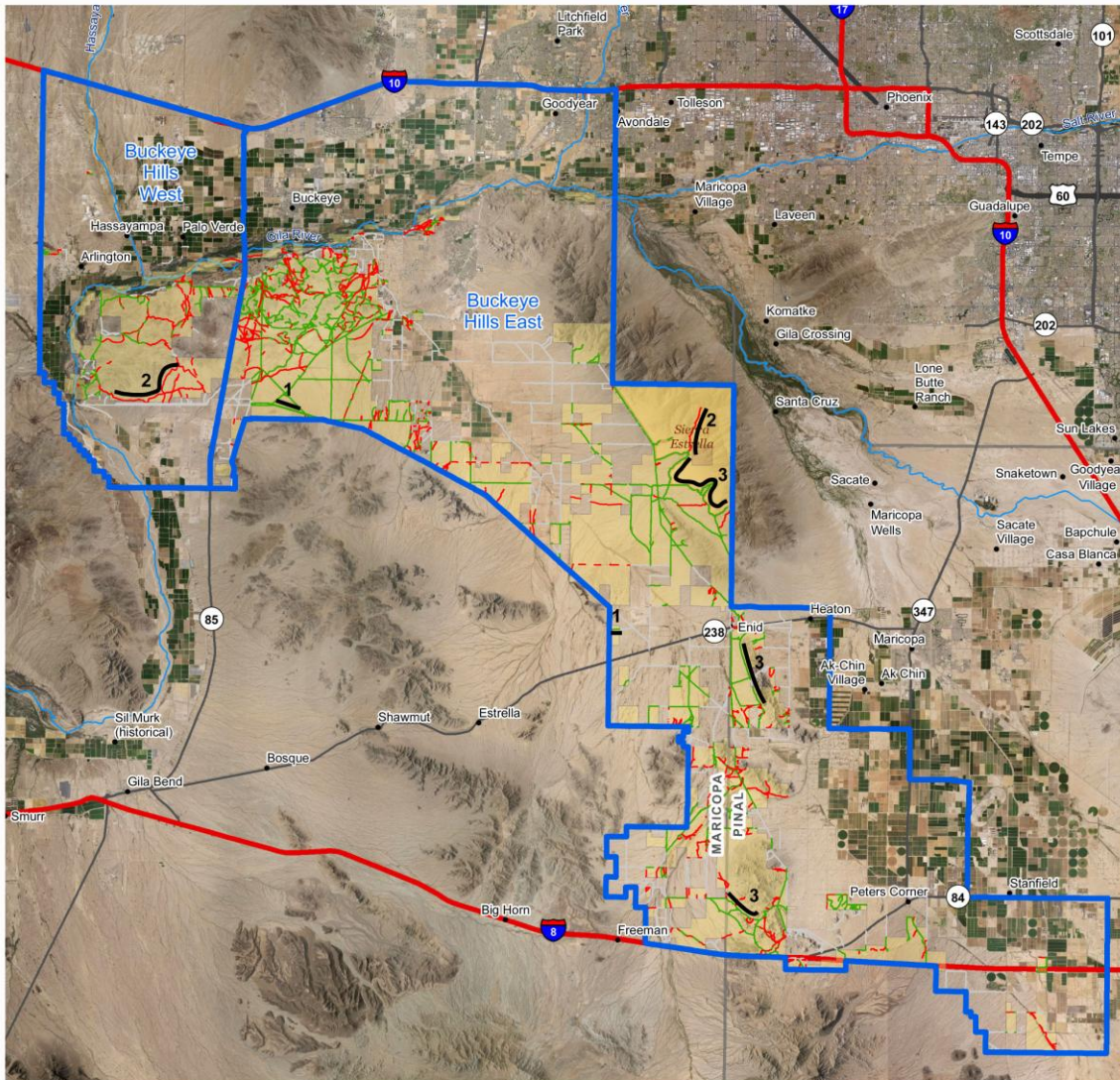


Figure 1. This map is a modification of EA Map 5, which shows the proposed road use designations under Alternative C (Proposed Action). The Council recommends seven minor changes to this road use designation plan (thick black lines) in order to protect Sonoran Desert tortoises and their habitat. These modifications are classified into three categories: 1) changes to "Limited to non-motorized use," due to concerns about proximity to Category I habitat; 2) changes to "Limited to non-motorized use" or "Limited to authorized and administrative use" due to concerns about feasibility of monitoring; and 3) changes to "Limited to non-motorized use" or "Limited to authorized and administrative use" due to concerns about dispersal and browsing in Category II habitat.