



**DESERT TORTOISE COUNCIL**

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**Via email only**

March 3, 2020

Bureau of Land Management  
Attn: Seth Flanigan, Project Manager  
3948 S. Development Avenue  
Boise ID 83702  
[blm\\_wo\\_grazing\\_email@blm.gov](mailto:blm_wo_grazing_email@blm.gov)

RE: Scoping comments for preparation of the Draft Environmental Impact Statement (DEIS) related to proposed changes in the Bureau of Land Management (BLM) grazing regulations

Dear Mr. Flanigan and other BLM officials:

Please accept, carefully review, and include in the appropriate project file our following scoping comments on the above-referenced matter.

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 tortoise species. Established in 1975 to promote conservation of tortoises in the deserts of the southwestern United States and Mexico, the Council routinely provides information and other forms of assistance to individuals, organizations, and regulatory agencies on matters potentially affecting desert tortoises within their geographic ranges.

We appreciate this opportunity to provide comments on this DEIS. The Council has long been an advocate for protecting tortoises and recommending measures to the BLM management in habitats occupied by Agassiz's desert tortoise (*Gopherus agassizii*) (synonymous with "Mojave desert tortoise") and Morafka desert tortoise (*Gopherus morafkai*) (synonymous with "Sonoran desert tortoise"). Between the years of 2014 and 2020, the Council has submitted the following ten comment letters to the BLM (and in one case, U.S. Fish and Wildlife Service) for grazing issues in the four states where these two species would be adversely affected. In most cases, there is no clear indication that our concerns have been addressed, that our recommendations have been implemented, or that BLM has acknowledged receipt of these comments.

Therefore, we take this opportunity to resubmit these letters as formal scoping comments for this DEIS, presented in chronological order:

### **Arizona**

- Comments on the Draft “Best Management Practices for Ranching in Sonoran Desert Tortoise (*Gopherus morafkai*) Habitat in Arizona” (10/31/2014)
- Environmental Assessment (EA) for the Lower Centennial Complex (2/13/2017)
- Proposed Grazing Permit Renewals for Beaver Dam Slope and Mormon Well Allotments (4/28/2019)
- Vulture Complex Grazing Authorization Renewal (DOI -BLM-AZ-P010-2020-0005-EA) (2/14/2020)
- Evaluation of Standards for Rangeland Health (BLM-AZIM-99-012) for the White Hills Evaluation Area, Mohave County, AZ (2/28/2020)

### **California**

- Desert Tortoise Council’s comments on the Draft EIR/EIS for the DRECP (2/23/2015)
- Scoping comments for proposal to renew Ord Mountain Allotment grazing lease (10/24/2016)
- Status and Trend of Agassiz’s Desert Tortoise Populations (3/20/2019)

### **Nevada**

- Las Vegas and Pahrump Field Offices Draft Resource Management Plan/Draft Environmental Impact Statement (2/6/2015)

### **Utah**

- Comments on the Beaver Dam Wash and Red Cliffs National Conservation Area Draft Resource Management Plans (10/15/2015)

Though many of these letters address our specific concern with sheep grazing, we reiterate here in this cover letter that, given the recent declines in tortoises throughout the listed range (Allison and McLuckie 2018, USFWS 2014), sheep grazing should be removed from all tortoise habitats. In its assessment of this DEIS, we expect that the USFWS’ “Biological Opinion for Ephemeral Sheep Grazing in the Western Mojave and Northern Colorado Deserts of California (6850 CA-932.5) (1-6-91-F-18),” which retired ephemeral sheep grazing from all desert tortoise critical habitat units in California, will be considered in the analysis to consider future sheep grazing in tortoise habitats.

We appreciate this opportunity to provide input and trust that our comments will help protect tortoises during subsequent grazing activities in tortoise habitats. Herein, we ask that the Desert Tortoise Council be identified as an Affected Interest for this and all other BLM projects that may affect species of desert tortoises, and that any subsequent environmental documentation for this particular project 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

- Allison L.J. and McLuckie, A.M. 2018. Population trends in Mojave desert tortoises (*Gopherus agassizii*). *Herpetological Conservation and Biology*. 2018 Aug 1;13(2):433-52.
- U.S. Fish and Wildlife Service. 2014. Status of the desert tortoise and critical habitat. Unpublished report available on the Desert Tortoise Recovery Office's website: "02/10/2014 Status of the Desert Tortoise and Critical Habitat (.704MB PDF)." Reno, NV.