



**DESERT TORTOISE COUNCIL**

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**Via email only**

6 July 2022

Ryan Chatterton, Field Manager  
Bureau of Land Management, El Centro Field Office  
1661 S. 4th Street  
El Centro, CA 92243  
[rchatterton@blm.gov](mailto:rchatterton@blm.gov)

RE: BLM's Seed Collection Project in Sonoran Desert of California

Dear Mr. Chatterton,

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 comment on this project. Given the project occurs in habitats likely occupied by Mojave desert tortoise (*Gopherus agassizii*) (synonymous with Agassiz's desert tortoise), our comments pertain to enhancing protection of this species during activities funded, authorized, or carried out by the Bureau of Land Management (BLM), which we assume will be added to the Administrative Record for this project. Please accept, carefully review, and include in the relevant project file the Council's following comments and attachments for the proposed project.

The Mojave desert tortoise is among the top 50 species on the list of the world's most endangered tortoises and freshwater turtles. The International Union for Conservation of Nature's (IUCN) Species Survival Commission, Tortoise and Freshwater Turtle Specialist Group, now considers

the Mojave desert tortoise to be Critically Endangered (Berry et al. 2021), as it is a “species that possess an extremely high risk of extinction as a result of rapid population declines of 80 to more than 90 percent over the previous 10 years (or three generations), population size fewer than 50 individuals, other factors.” It is one of three turtle and tortoise species in the United States to be critically endangered. This status, in part, prompted the Council to join Defenders of Wildlife and Desert Tortoise Preserve Committee (Desert Tortoise Council 2020) to petition the California Fish and Game Commission in March 2020 to elevate the listing of the Mojave desert tortoise from threatened to endangered in California .

The BLM’s press release dated June 22, 2022, which was provided to the Council by one of its members rather than the BLM, describes this project as follows: The BLM has initiated “the first of a five-year native seed collection project for the Bureau of Land Management (BLM) California El Centro Field Office.” “The collected seeds will be used to restore wildlife habitat for the desert pupfish, desert tortoise, peninsular bighorn sheep, and flat-tailed horned lizard. They will also be used to restore areas burned by wildfire or damaged by unauthorized recreation or development.”

We support this effort by BLM and congratulate the staff who proposed it and the manager(s) who supported it. However, we remind BLM that this is the first step of a multi-step and multi-decade process that must occur if BLM is to be successful at restoring native vegetation on public land in the Sonoran Desert of California. Restoration also includes ensuring that successful methodologies are implemented to store the seeds; researching, preparing, and implementing a successful restoration plan using methods that have proven successful; germinating and growing native plants from seed; substantially reducing/eliminating human-caused threats to the growth, survival, and reproduction of native plants; and prioritizing enforcement and education in the restoration areas to help achieve successful habitat restoration.

In addition, if BLM is serious about restoring habitat for the Mojave desert tortoise, seed collection should include species of native annual forbs that the tortoise depends on for adequate nutrition and water balance. The plant species mentioned in the press release were limited to native woody shrubs. We acknowledge this is the first year of a 5-year seed collection effort and are strongly advising that in future years, BLM include native annual forbs in its seed collection efforts.

To assist BLM in habitat restoration efforts, particularly for the Mojave desert tortoise, we are providing the following papers and a reference for your use:

Best Management Practices – Restoring Perennial Plants

[https://deserttortoise.org/wp-content/uploads/BMP\\_fact\\_sheet\\_1\\_restore\\_perennials.pdf](https://deserttortoise.org/wp-content/uploads/BMP_fact_sheet_1_restore_perennials.pdf)

Best Management Practices – Enhancing Forage for the Mojave Desert Tortoise

[https://deserttortoise.org/wp-content/uploads/BMP\\_fact\\_sheet\\_2\\_forage.pdf](https://deserttortoise.org/wp-content/uploads/BMP_fact_sheet_2_forage.pdf)

Best Management Practices – Salvaging Topsoil

[https://deserttortoise.org/wp-content/uploads/BMP\\_fact\\_sheet\\_3\\_topsoil.pdf](https://deserttortoise.org/wp-content/uploads/BMP_fact_sheet_3_topsoil.pdf)

Best Management Practices – Rehabilitating Lands After Severe Disturbance

[https://deserttortoise.org/wp-content/uploads/BMP\\_fact\\_sheet\\_4\\_severe\\_disturbance.pdf](https://deserttortoise.org/wp-content/uploads/BMP_fact_sheet_4_severe_disturbance.pdf)

Best Management Practices – Reducing Impacts of Roads  
[https://deserttortoise.org/wp-content/uploads/BMP\\_fact\\_sheet\\_5\\_roads.pdf](https://deserttortoise.org/wp-content/uploads/BMP_fact_sheet_5_roads.pdf)

Restoration plan for site within the Eastern Expansion Area of Desert Tortoise Research Natural Area  
[https://deserttortoise.org/wp-content/uploads/restoration\\_plan\\_guidance\\_21apr2017.pdf](https://deserttortoise.org/wp-content/uploads/restoration_plan_guidance_21apr2017.pdf)

Abella S.R. and K.H. Berry. 2016. Enhancing and restoring habitat for the desert tortoise (*Gopherus agassizii*). *Journal of Fish and Wildlife Management* 7(1):255–279.  
<https://doi.org/10.3996/052015-JFWM-046>.

We appreciate this opportunity to provide comments on this project and trust that BLM will contact us on the progress of this project so that the Council has future opportunities to provide recommendations and possibly assistance on implementing habitat restoration activities for the tortoise. You may contact us at the new address in our letterhead.

Respectfully,



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

cc: BLM Director, Tracy Stone-Manning, [tstonemanning@blm.gov](mailto:tstonemanning@blm.gov)  
BLM Deputy Director of Policy, Nada L. Culver, [nculver@blm.gov](mailto:nculver@blm.gov)  
BLM California State Director, Karen Mouritsen, [kmouritsen@blm.gov](mailto:kmouritsen@blm.gov)

### Literature Cited

Berry, K.H., L.J. Allison, A.M. McLuckie, M. Vaughn, and R.W. Murphy. 2021. *Gopherus agassizii*. The IUCN Red List of Threatened Species 2021: e.T97246272A3150871.  
<https://dx.doi.org/10.2305/IUCN.UK.2021-2.RLTS.T97246272A3150871.en>