



**DESERT TORTOISE COUNCIL**

3807 Sierra Highway #6-4514

Acton, CA 93510

[www.deserttortoise.org](http://www.deserttortoise.org)

[eac@deserttortoise.org](mailto:eac@deserttortoise.org)

**Via email and BLM NEPA eplanning portal**

September 11, 2022

Attn: Laura Goff  
St. George Field Office  
Bureau of Land Management  
Attn: Integrated Weed Management Plan  
345 East Riverside Drive,  
St. George, UT 84790  
[lgoff@blm.gov](mailto:lgoff@blm.gov)

RE: Integrated Weed Management Plan for the Control and Eradication of Noxious and Invasive Species and Programmatic Environmental Assessment (DOI-BLM-UT-C030-2022-0018-EA)

Dear Ms. Goff,

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.

As of June 2022, our mailing address has changed to:

Desert Tortoise Council  
3807 Sierra Highway #6-4514  
Acton, CA 93510.

Our email address has not changed. Both addresses are provided above in our letterhead for your use when providing future correspondence to us.

We appreciate this opportunity to provide comments on the above-referenced project. Given the location of the proposed project 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 Decision Record for this project as needed. Please accept, carefully review, and include in the relevant project file the Council's following comments 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 Council appreciates BLM contacting us directly about the availability of this Integrated Weed Management Plan for the Control and Eradication of Noxious and Invasive Species and Programmatic Environmental Assessment (PEA) for public comment. Below are our comments on this PEA that are meant to update and broaden options available to BLM under a programmatic environmental assessment for control/elimination of invasive plant species and restoration of native plant assemblages in the Beaver Dam Wash and Red Cliffs National Conservation Areas (NCAs).

### **Purpose and Need**

"The purpose of and need for the Proposed Action is to control and eradicate noxious weeds and exotic invasive species in the Beaver Dam Wash and Red Cliffs NCAs, using an integrated approach." We support this purpose and need but request that it be expanded to include restoring native vegetation that has been "outcompeted" by invasive plant species. If BLM re-establishes and manages for native plant species, it will be more difficult for invasive plant species to become established and proliferate in desert environments. Please see our comments below under Chapter 3—Affected Environment, Section 3.3.2 Soils.

### **Proposed Action and Alternatives**

BLM describes three action alternatives and a No Action Alternative considered for implementation in the Beaver Dam Wash NCA and Red Cliffs NCA, and analyzes two alternatives. The 63,645-acre Beaver Dam Wash NCA and 45,600-acre Red Cliffs NCA are located in Washington County, Utah, in the southwestern corner of the state.

Alternative A – Proposed Action – BLM would implement integrated weed management strategies/methods of prevention (e.g., using certified weed-free products) cultural (e.g., seeding, planting, etc.), chemical (e.g., pelletized, granular, or liquid products and

would likely be applied with an adjuvant, using spray bottles, backpack sprayers, off-highway vehicle (OHV) or truck-mount sprayers, broadcasters (i.e., granular product), and aircraft, and manual (e.g., hand tools and hand-operated power tools to cut, clear, or prune herbaceous and woody species) methods. Weed treatments in the NCAs are expected to be less than 5 acres in a single area, and would be conducted primarily using either manual removal or ground-based herbicide control methods.

Numerous factors would be evaluated when considering which type of treatment to use, including the size and location of the infestation, natural and cultural resources within and near the proposed treatment area, use of the area by the public, potential impacts to non-target species, the efficacy of the method, and cost. BLM would use only herbicides currently approved under previous BLM NEPA analysis for ground-based treatments, and to herbicides approved by the agency in the future, based on their proven safety, efficacy, and low risk to human health. Aerial herbicide spraying would be used primarily for creation of fire breaks.

Approximately 25-100 acres/year could be treated in each NCA using cultural strategies/methods, 50-150 acres/year using herbicides, and 5-25 acres/year using manual strategies/methods. No large landscape-level treatments of exotic invasive annual grasses are anticipated in either NCA.

Alternative B – No Action Alternative – The goals, objectives, and management actions from the Records of Decision/approved Resource Management Plans for the Beaver Dam Wash and Red Cliffs NCAs (BLM 2016a,b) would continue to guide the control and eradication of noxious weeds and invasive species in the NCAs. Each treatment would require that a project-specific NEPA analysis and Biological Assessment be prepared unless a prior EA or EIS adequately covered the proposal. The use of a BLM-approved pre-emergent herbicide could be used as a weed management tool along specific roadways in the Red Cliffs NCA. Short-and long-term monitoring of treatment areas and evaluations of the efficacy of the approved treatment methods would be conducted

Alternatives Considered but Eliminated - *Biological Treatments*: Biological treatments employ insects, nematodes, fungi, pathogens, and mites to control and eradicate weeds. *Mechanical Control Treatments*: Mechanical control refers to the use of heavy equipment, either motorized or mechanized, such as bulldozers, tractors, plows, mulching machines, brush hogs, grubbers, etc. to remove noxious weeds or invasive species. The potential, but uncertain, environmental consequences that could result from biological treatments and the impacts on the natural and cultural resources of the NCAs that could result from the use of heavy equipment were considered by BLM to be unacceptable effects given the resource conservation and protection purposes for the NCAs.

The Council contends that a successful integrated weed management plan should include the management of the foundation that supports the native vegetation in the NCAs – the soils and soil crusts. We recommend that the Alternative A be expanded that includes the establishment and management of healthy soils and soil crusts. Because of reduced increasing temperatures, reduced

soil moisture, and variable rainfall including the current megadrought (Stahle 202, Williams et al. 2022), BLM should focus on improving the physical, chemical, and biological components (e.g., fixing carbon) of soils to help buffer these impacts from climate change. Improving water infiltration into soils as water becomes less available requires a reduction in activities that compact soils, remove native vegetation, modify the soil's physical properties, and degrade/destroy soil crusts. Biological soil crust communities play an important role in surface hydrologic processes in desert ecosystems and can be dramatically altered with soil surface disturbance. Faist et al. (2017) reported well-developed, intact dark biocrusts generally had lower runoff and sediment loss and highest aggregate stability, whereas the less-developed light biocrusts were highest in runoff and sediment loss after disturbance (trampling/scraping) when compared to the controls. Please see our comments below under Chapter 3—Affected Environment, Soils.

The programmatic EA should analyze all current and likely future methods of treatment for noxious weed and invasive plant species. The PEA should include directed energy sources (e.g., specific light wavelengths and heat energy). Please see our comments below under Specific Comments, page 4.

Another factor that BLM should address is the limited size of areas that would be treated and native vegetation restored (e.g., seeding, replanting, etc.). BLM reported in the PEA that in 2020, three wildfires burned approximately 11,410 acres within the Red Cliffs NCA. Because much more than BLM's reported annual treatment of up to 150 acres have been severely degraded/destroyed by invasive species that have acted as fuel to carry wildfires, the acreage restored using cultural methods that include biological soil crusts and native vegetation should be much greater. Because this environmental assessment is a programmatic one, BLM should raise the upper range of acres treated annually as opportunities to restore larger areas in the NCAs may be available in the future.

If NCAs are allowed to accept donations of money and/or time for invasive species management and vegetation restoration work, BLM should explore this option for both funding and as a workforce. BLM's websites for the two NCAs have little to no information on the serious issues of invasive plant species, fire, and how the public can help to conserve and restore native vegetation. We strongly suggest that BLM improve its websites for the two NCAs by adding easy to find information on the importance of the natural resources in the NCAs, how past human activities have contributed to their degradation/destruction, and how visitors and non-visitors to the NCAs can help restore and conserve natural resources such as biological soil crusts and native vegetation. This suggestion would apply to social media too.

### **Chapter 3—Affected Environment**

Section 3.3.2 on Soils describes the functions of soil crusts. We request that BLM add the additional crucial functions of soil crusts of (1) inhibiting germination of invasive species with large seeds (e.g., *Bromus tectorum*) (Kaltenecker et al. 1999, Belnap et al. 2001), and (2) fixing carbon (Belnap et al. 2001).

In the section 3.3.5 Invasive Species/Noxious Weeds, BLM defines a noxious weed as “a nonnative plant that disrupts or has the potential to disrupt or alter the natural ecosystem function, composition, and diversity of the site it occupies.” This is followed by a list of noxious weeds as defined/declared by Utah state law. BLM does not list any other noxious weeds occurring in the

two NCAs. This is followed with BLM defining an invasive weed as “a species that is nonnative to the ecosystem under consideration and whose introduction is likely to cause economic or environmental harm or harm to human health.” Under this category BLM lists cheatgrass, red brome, Russian thistle, London rocket, bull thistle, redstem storksbill/filaree, and Russian olive.

Because this is a PEA, we request that BLM clarify that the species named in this PEA are not a complete list of noxious weeds/invasive species, and that additional species (e.g., *Schismus* spp.) in the future may occur in the NCAs and be the target of integrated weed management and restoration efforts.

In section 3.3.9 Threatened, Endangered or Candidate Animal Species, BLM says the Mojave desert tortoise was listed as threatened in 1990. Prior to this, on August 20, 1980, the U.S. Fish and Wildlife Service (USFWS) listed the Beaver Dam Slope population in Utah as threatened under the Federal Endangered Species Act (FESA) (45 Federal Register 55654–55666). This population is located in the Beaver Dam Wash NCA. We request that BLM update the information on the listing history of the tortoise in the PEA.

#### **Chapter 4—Environmental Impacts**

Under section 4.3.2 Soils, BLM describes the direct impacts to biological soil crusts from implementation of Alternative A. The Council believes BLM is missing an opportunity to improve the functions of the ecosystems in the two NCAs by not including biological soil crusts in the PEA. BLM should include restoration/management of biological soil crusts in the Proposed Action. As described earlier in the PEA by BLM, soil crusts increase soil stability and reduce erosion, fix atmospheric nitrogen, contribute nutrients to plants, assisting with plant growth, and as we added above, fix carbon and inhibit germination of invasive species with large seeds. If BLM’s purpose is to control noxious and invasive weeds and “promote the growth of native plant species to remediate surface disturbances and wildfire impacts,” BLM should add activities to the Proposed Action that would establish and improve biological soil crusts. Managing for biological soil crusts would help offset the adverse impacts from herbicide use. In addition, because of the importance of the functions of soil crusts for survival and growth of native vegetation especially under increasing aridity from climate change, we strongly recommend that where integrated weed management is implemented, surface disturbance such as trampling, compaction from vehicles/equipment, and scraping should not be authorized.

Under section 4.3.8 Threatened, Endangered or Candidate Animal Species, BLM says for the Mojave desert tortoise, “[t]he Proposed Action, therefore, warrants a “may affect, not likely to adversely affect” determination for this threatened species and its designated critical habitat.” However, in Appendix C, BLM says, “If this does not occur within 15 minutes, the BLM tortoise biologist (or other approved tortoise biologist) will be contacted to remove and relocate the tortoise.”

We are confused by these conflicting statements. “May affect but is not likely to adversely affect” means BLM completes section 7 consultation under the FESA with informal consultation and no take (handling) is authorized. Removing and relocating a tortoise is take under the FESA and requires formal consultation, with the USFWS issuing a biological opinion to authorize take. We suggest that BLM request formal consultation in the event that a tortoise needs to be moved. This

is a programmatic NEPA document and this approach would give BLM more flexibility in implementing an action alternative.

BLM says, “This EA serves as the Biological Assessment (BA) to document anticipated effects of the Proposed Action on ESA-listed or candidate species and to request concurrence with the effects determinations provided in the EA.” When we reviewed the section that described the potential effects to the Mojave desert tortoise and tortoise critical habitat, we found no mention of impacts from the use of vehicles or motorized equipment during the implementation of manual, chemical, or cultural methods. In addition, we found no analysis of impacts to designated critical habitat in this section. Please include a description and analysis of all impacts, both adverse and beneficial, for all methods (e.g., preventative, cultural, manual, chemical, etc.) BLM may be using and provide references to support concluding statements in this section. For example, BLM says “[o]ther potential impacts could include accidental direct contact with herbicides, indirect contact with contaminated foliage, and ingestion of contaminated food/water items.” What are the effects to the tortoise from exposure to a herbicide from each of these pathways?

Please provide data with references or cite other documents that analyze these effects and summarize the effects in the PEA. In addition, we advise BLM to update its analysis of impacts to the tortoise from contact with the list of herbicides it proposes to use, as recent research using reptiles/turtles indicates that some herbicides have harmful effects previously unknown for the 2007 and 2015 consultations. Please see our comment below about pages 13 and 16 of the PEA.

### **Comments on Appendix C**

Appendix C lists the Specific Environmental Protection Measures, and Standard Operating Procedures BLM would require for implementation of the Proposed Action. We were unable to find a measure or procedure that describes what actions BLM would require if a tortoise is inadvertently sprayed/streamed with a herbicide, a burrow is accidentally collapsed during manual or chemical application methods, or a tortoise is injured or killed from the use of vehicles or equipment. Please include information for these actions in the PEA.

BLM says “2,4-D would not be used within 0.25 mile of occupied tortoise habitat.” This statement raises the question – what is the source of the information that delimits a 0.25-mile buffer for occupied tortoise habitat when using 2,4-D? Is this buffer based on a tortoise’s annual home range if 2,4-D’s degradation rate is less than a year in the environment, or another metric? Please revise the PEA to include the data that supports the need for/adequacy of a 0.25-mile buffer of occupied tortoise habitat.

In Appendix C, BLM says, “[b]efore manual or herbicide treatment activities begin, a pre-project meeting will be held between the workers and the BLM tortoise biologist to review all conservation measures. A handout of the conservation measures will be provided to all onsite workers.” The usual procedure for projects in tortoise habitat include a requirement that workers are required to sign a document that they have read and understand the conservation measures (environmental protection measures and standard operating procedures) and will abide by them. Please add this requirement to the Environmental Protection Measures and Standard Operating Procedures in the PEA.

We found specific Environmental Protection Measures and Standard Operating Procedures for the implementation of chemical and manual methods but nothing for cultural methods. It is equally important that BLM remove invasive species as they replant native plant species and restore soil crusts. Please revise the PEA to include Environmental Protection Measures and Standard Operating Procedures for cultural applications, as they frequently include the use of vehicles and motorized equipment that may adversely impact tortoises/tortoise critical habitat.

### **Climate Change**

The PEA does not analyze the impacts of the Proposed Action on greenhouse gas emissions. We believe that that addition of restoring and managing for biological soil crusts to the Proposed Action would result in a beneficial impact to reducing greenhouse gas emissions. Consequently, we recommend that BLM add this management action and benefit to the PEA. Please see our comment above under section 4.3.2 Soils.

### **Cumulative Impacts**

In the cumulative effects analysis of the DEIS, please ensure that the CEQs “Considering Cumulative Effects under the National Environmental Policy Act” (1997) is followed, including the eight principles, when analyzing cumulative effects of the proposed action to the tortoise and its habitats. CEQ states, “Determining the cumulative environmental consequences of an action requires delineating the cause-and-effect relationships between the multiple actions and the resources, ecosystems, and human communities of concern. The range of actions that must be considered includes not only the project proposal but all connected and similar actions that could contribute to cumulative effects.” The analysis “must describe the response of the resource to this environmental change.” Cumulative impact analysis should “address the sustainability of resources, ecosystems, and human communities.”

CEQs guidance on how to analyze cumulative environmental consequences, which contains eight principles listed below:

#### **1. Cumulative effects are caused by the aggregate of past, present, and reasonable future actions.**

The effects of a proposed action on a given resource, ecosystem, and human community, include the present and future effects added to the effects that have taken place in the past. Such cumulative effects must also be added to the effects (past, present, and future) caused by all other actions that affect the same resource.

#### **2. Cumulative effects are the total effect, including both direct and indirect effects, on a given resource, ecosystem, and human community of all actions taken, no matter who (federal, non-federal, or private) has taken the actions.**

Individual effects from disparate activities may add up or interact to cause additional effects not apparent when looking at the individual effect at one time. The additional effects contributed by actions unrelated to the proposed action must be included in the analysis of cumulative effects.

#### **3. Cumulative effects need to be analyzed in terms of the specific resource, ecosystem, and human community being affected.**

Environmental effects are often evaluated from the perspective of the proposed action. Analyzing cumulative effects requires focusing on the resources, ecosystem, and human community that may be affected and developing an adequate understanding of how the resources are susceptible to effects.

**4. It is not practical to analyze the cumulative effects of an action on the universe; the list of environmental effects must focus on those that are truly meaningful.**

For cumulative effects analysis to help the decision maker and inform interested parties, it must be limited through scoping to effects that can be evaluated meaningfully. The boundaries for evaluating cumulative effects should be expanded to the point at which the resource is no longer affected significantly or the effects are no longer of interest to the affected parties.

**5. Cumulative effects on a given resource, ecosystem, and human community are rarely aligned with political or administrative boundaries.**

Resources are typically demarcated according to agency responsibilities, county lines, grazing allotments, or other administrative boundaries. Because natural and sociocultural resources are not usually so aligned, each political entity actually manages only a piece of the affected resource or ecosystem. Cumulative effects analysis on natural systems must use natural ecological boundaries and analysis of human communities must use actual sociocultural boundaries to ensure including all effects.

**6. Cumulative effects may result from the accumulation of similar effects or the synergistic interaction of different effects.**

Repeated actions may cause effects to build up through simple addition (more and more of the same type of effect), and the same or different actions may produce effects that interact to produce cumulative effects greater than the sum of the effects.

**7. Cumulative effects may last for many years beyond the life of the action that caused the effects.**

Some actions cause damage lasting far longer than the life of the action itself (e.g., acid mine damage, radioactive waste contamination, species extinctions). Cumulative effects analysis need to apply the best science and forecasting techniques to assess potential catastrophic consequences in the future.

**8. Each affected resource, ecosystem, and human community must be analyzed in terms of its capacity to accommodate additional effects, based on its own time and space parameters.**

Analysts tend to think in terms of how the resource, ecosystem, and human community will be modified given the action's development needs. The most effective cumulative effects analysis focuses on what is needed to ensure long-term productivity or sustainability of the resource.

We request that BLM demonstrate in the PEA that they have analyzed the cumulative effects of the Proposed Action for these eight principles.



## Specific Comments

Page 4, Section 1.4 Conformance with BLM Resource Management Plans, BLM provides the information from the RMPs for the two NCAs:

*“WED-6: Authorize the use of biological controls, flaming, targeted grazing, hand removal, herbicide, mechanical methods, or a combination of methods for weed treatments, depending on target species, infestation level, site characteristics, and project scale.*

*WED-10: Pursue opportunities for scientific studies to test the effectiveness of herbicides approved for use on public lands in the reduction of exotic invasive annual grasses in Mojave Desert and transitional communities.”*

We agree that different herbicides may be more effective depending on the target plant species and plant’s phenology and physiology. However, this is a **programmatic** EA for **integrated** weed management (emphasis added); it should include all current methods available, methods currently being developed that would be available in the next few years, and, for WED-10, study combinations of methods, not just herbicides, as they may provide optimum results over one method while minimizing impacts to non-target flora and fauna. We request that BLM broaden its toolbox of methods that may be used in the NCAs to control and eradicate noxious weeds and exotic invasive species to include energy sources such as directed energy (Edwards Air Force Base 2016, Yahoo News 2016, Global Neighbor 2022) and study combinations of methods. Energy source methods such as certain heat and light frequencies may be as effective as herbicides and less damaging to non-targeted species such as the tortoise, especially the younger age classes.

Other RMP decisions were listed in this section that were applicable to weed management. They focused on protection of native vegetation, critical habitat, and habitats of BLM sensitive species when implementing weed control methodologies. If BLM wants to achieve the purpose of the Proposed Action, they need to:

- 1) Prevent weed sources from coming to the NCAs (some are listed in Appendix C) ,
- 2) eliminate weeds and their seed banks in the NCAs, and
- 3) restore native vegetation including soil crusts so weedy species have a more difficult time becoming established.

We were unable to find a decision that focused on implementing management and monitoring to reduce/eliminate the transport of non-native seed and other plant parts from noxious and invasive plant species. It appears that BLM is focused on trying to prevent the germination of existing seeds in the seed banks in the NCAs, but will continue to let more seeds and plant parts be brought into the NCAs because BLM is not implementing a change in management of these activities (e.g., vehicle access, grazing, etc.). Controlling weeds requires management actions on multiple fronts. With BLM’s proposed single front approach, BLM will likely have reduced success in its purpose to control and eradicate of noxious weeds and invasive plant species in the NCAs.

We strongly recommend that BLM implement scientific studies, management, and monitoring that eliminates the sources of seeds/plant propagules of noxious weeds and invasive plant species from as many sources as possible. Rather under Preventative Weed Control (section 2.3.1

Methodologies) BLM is limiting preventative weed control to projects that result in new surface disturbance. BLM needs to include management for weeds that proliferate from current or ongoing surface disturbance activities such as grazing, OHVs, and ROW maintenance.

Page 12, Section 2.3, Alternative A – Proposed Action – BLM says, “weed treatments in the NCAs are expected to be small scale, affecting less than 5 acres in a single area, and would be conducted primarily using either manual removal or ground-based herbicide control methods.”

Regarding Alternative A, please see our comments above under Page 4, Section 1.4, regarding BLM broadening the methods used in implementation of integrated weed management in the NCAs.

Page 13, “Herbicides used in ground-based treatments would be limited to those currently approved for use by the BLM, and to those that will be approved by the agency in the future, based on their proven safety, efficacy, and low risk to human health.” Herbicide use is also about low risk to the environment.

We request that BLM include the biological opinion from the U.S. Fish and Wildlife Service (BLM 2007, 2016) that analyzed for each herbicide and combinations of herbicides BLM proposes to use the effects to the tortoise through direct exposure/pathways and indirect exposure/pathways and during all life stages of the tortoise – hatchling, juvenile, and adult including reproductive females and critical habitat. These documents would be an appendix to the PEA.

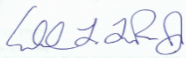
Page 16, Pesticide Use Proposal – In this section BLM says, “The final Biological Opinion issued by the USFWS for the 2007 Programmatic EIS (BLM 2007a) prohibited use of dicamba, due to its potentially unacceptable effects on California condor (*Gymnogyps californianus*) and Mojave desert tortoise (*Gopherus agassizii*).” In that consultation with the USFWS on the use of 18 herbicides in 17 western states (BLM 2007a Appendix C), the USFWS said “all specific actions carried out under this PEIS would also undergo consultation.”

We request that BLM include this requirement in the PEA and copies of the biological opinions/concurrence memos from USFWS and corresponding biological assessments submitted to the USFWS by BLM. Our concern is that for the tortoise, the analyses of effects of the herbicides occurred in one case more than a decade ago when there was little to no testing conducted on acute or chronic effects to reptiles. Since that time, researchers have started to study reptiles as non-target species of herbicides, and new information has become available on the toxicity of some herbicides, such as glyphosate (e.g., Kettle et al. 2018 – reduced survival of gut bacteria and effects on digestion of vegetation, Verderame et al. 2022 – alteration of reproductive morphophysiology and reduced sperm production), to reptiles that was not previously available during BLM’s consultations with the USFWS. Note that 50 Code of Federal Regulations 402.16 requires the reinitiation of formal consultation if “new information reveals effects of the agency action that may affect listed species or critical habitat in a manner or to an extent not considered.” The previous section 7 consultation from 2007 did not contain the new information from recent research on the effects of herbicides on the tortoise/reptiles. We contend BLM should reinitiate section 7 consultation with the USFWS and revise its Ecological Risk Assessments using current data on the effects of herbicides on turtles/reptiles.

The Council supports the implementation of management actions that would reduce/eliminate current stands of invasive plant species, prevent their reoccurrence, prevent the introduction/proliferation of new stands/species, and restore biological soil crusts and native vascular plants in these NCAs. All four management actions must be implemented concurrently if BLM is to be successful in controlling and eradicating noxious weeds and exotic invasive species in the NCAs.

We appreciate this opportunity to provide comments on this project and trust they will help protect tortoises during any resulting authorized activities. Herein, we reiterate that the Desert Tortoise Council wants to be identified as an Affected Interest for this and all other projects funded, authorized, or carried out by the BLM that may affect species of desert tortoises, and that any subsequent environmental documentation for this project is provided to us at the contact information listed above. Additionally, we ask that you respond in an email that you have received this comment letter so we can be sure our concerns have been registered with the appropriate personnel and office for this project.

Respectfully,



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

cc: Greg Sheehan, Utah State Director, Bureau of Land Management [gshreehan@blm.gov](mailto:gshreehan@blm.gov)  
Martha Williams, Deputy Director, U.S. Fish and Wildlife Service  
[martha\\_williams@fws.gov](mailto:martha_williams@fws.gov)  
Yvette Converse, Field Office Supervisor, Utah Ecological Service Field Office  
[yvette\\_converse@fws.gov](mailto:yvette_converse@fws.gov)

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